

# ENVIRONMENTAL POLICY & MANAGEMENT SYSTEM GUIDE

#### **Statement of Intent**

Corps Security aims to create and maintain through staff awareness, the highest level of environmental responsibility. We regard the protection of the environment from the possible effects of our commercial activities to be of the utmost importance to all employees who work within Corps Security

Corps Security aims to educate train and motivate staff to work in an environmentally responsible manner and to play a full part in developing new ideas and initiatives.

Corps Security aims to demonstrate control of the key impact areas relating to consumption, energy usage, emissions, waste, transport and services provided and to base our programme of activities on the management standards contained within BS EN ISO 14001:2004

#### **Policy**

This policy statement applies to all parts of Corps Security and is consistent with the company's policies and procedures relating to its Quality Management System and on Health and Safety. The policy will be reviewed at least every three years and revised as necessary

#### Responsibilities

Specific responsibilities for the implementation and integration of this Environmental Management System into the operations of Corps Security are laid out in Section 3 of this document.

Date: 01st March 2014

Signed:

Peter Webster Chief Executive Officer

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#### 2. Introduction

Corps Security has adopted an environmental system using the ISO 14001:2004 Environmental Standard as a model for the Company Environmental Management System (EMS). Where practical, the EMS will be integrated into the ISO 9001: 2008 Quality Management System enabling appropriate usage of resources and expertise. This guide highlights areas for integration and details specific policy and procedures.

## 3. Roles and Responsibilities

This section of the guide defines the Environmental Management System (EMS) roles and responsibilities for Corps Security

#### Chief Executive Officer – Mr Peter Webster

Mr Peter Webster, The Chief Executive Officer, is ultimately responsible for all environmental matters. He also determines policy and strategy relating to environmental matters, assisted by the Environmental Steering Group (ESG)

## The Environmental Representative – Mr Lynn Thomas

Mr Lynn Thomas, The Company Secretary, has overall responsibility and authority for maintaining the documented Environmental Management System and ensuring that sufficient budget, resource and training are available to meet requirements

## The Environmental Steering Group (ESG)

The Steering Group has overall responsibility for:

- 1. Overseeing EMS implementation, ensuring systems are efficient
- Ensuring formal process is observed and the stated requirements of Corps Security are met
- 3. Setting Environmental Management System (EMS) strategy and policy, subject to Senior Management Team approval

## The Environmental Management Systems Team (EMS)

The main responsibilities of the team are:

- 4. Ensuring that designated environmental monitoring is carried out, either using internal or external resources, to agreed standards and at the prescribed frequencies
- 5. Developing and maintaining environmental records
- 6. Assessment of the environmental aspects and impacts relating to the company's operations and for developing the annual environmental objectives, targets and management programme
- 7. Monitoring the EMS through regular internal auditing, implementing corrective action as necessary and recommending preventive action

#### **Quality and Compliance Manager**

The Quality and Compliance Manager will:

- 8. Ensure that new employees receive induction in environmental matters
- 9. Report major incidents ensuring that the Environmental Aspect Register is kept up to date
- 10. Regularly inspect all plant and operations to ensure that health, safety and environmental requirements are being adhered to
- 11. Inspect all proposed new processes, plant and buildings for potential environmental hazards before commissioning
- 12. Ensure that risk/COSHH assessments are carried out and include environmental compliance

## Managers and Supervisors

Managers and supervisors, regardless of position or level of responsibility for any particular site will:

- 13. Be familiar with, and support, the Environmental Process, controls and initiatives
- 14. Liaise with clients to ensure that their own environmental initiatives are understood and complied with by Corps Security Staff
- Develop safe environmental practices and, by training and supervision, ensure maximum safety for the environment which may be affected by persons under their control
- 16. Ensure that any outstanding environmental actions resulting from environmental inspections, audits, safety hazard reports or risk assessments are carried out within the recommended time scales
- 17. At staff assessment, identify environmental training needs if applicable

#### All Personnel

All personnel have responsibility for:

- 18. Reporting environmental incidents for corrective action
- 19. Disposing of all waste in the correct manner as detailed in the waste management guide
- 20. Supporting energy conservation on site by switching off equipment under their control when not in use, turning off unnecessary lighting, shutting doors on heated buildings, etc.
- 21. Where relevant, submitting observations, ideas and suggestions for environmental improvements

#### Contractors

All contractors working at any Corps Security site shall be responsible for themselves, their employees and subcontractors appointed by them. All mandatory risk and COSHH assessments must also be provided and approved before any work commences

# 4. Aspects/Impacts Register

This register will be compiled and maintained by the EMS team and is available within the Environmental Manual – Section 1- B. The team has responsibility for identifying the Company environmental aspects and assessing the impacts. Changes to applicable legislation or company circumstances may necessitate the team revaluating the impacts or additional aspects being added. The register will be maintained using a database and will be reviewed yearly.

The Aspects/Impacts Register will be used to help set the yearly objectives and targets.

# 5. Objectives and Targets

Objectives and targets that flow down from the company Environmental Policy and recognise defined aspects / impacts legal & other requirements and best practice will be set on a yearly basis by the Steering Group. Where practical, the objectives will consider technological options, financial, operational and business requirements and the views of interested parties to include the Corps Security Colleague Consultative Committee

#### 6. Communication

#### **Environmental Policy**

The Company Environmental Policy will be made available as follows:

- 22. Policy will be provided on request to interested parties such as clients, environmental groups, local authorities, environmental agencies etc.
- 23. Hard copies of the Policy will be available at each area office. These copies will only be distributed on request
- 24. On the Corps Security Internet Site
- 25. Access to the environmental policy within Corps Security will be via the Document Centre and the Company Intranet

## Significant Aspects

There will be no general external communication of Corps Security's significant aspects. The company will make this information available if requested by external agencies, insurers, customers and regulators etc., on a need to know basis

#### **Environmental Incidents**

In the event of an Environmental Incident, only trained Directors are permitted to make press statements to the media

#### General

External environmental communications, requests or complaints must be logged by the EMS team into the Environmental Action List Database. This database will also be used to record the actions taken

# 7. Supply Chain Management

A management programme team led by the Commercial Manager will determine Corps Security's supply chain. Only approved suppliers will be used who can demonstrate their own commitment to environmental management.

# 8. Management Programmes

Where required, management programmes will be devised to cover specific areas of concern. These management programmes will contain time frames and responsibilities for achieving individual objectives.

Some examples of management programmes are as follows:

- 26. To ensure that environmental and legislation criteria are applied in all phases of the tender/re-tender process. Led by Environmental Steering Group on-going
- 27. Conduct analysis of 2013 energy usage for Market House and reduce usage by 5% in 2013 duration 1 year.
- 28. Reducing wastage and encouraging recycling and reuse where practical. Led by Environmental Systems Team duration 1 year.
- 29. Obtain independent benchmarking figures for our vehicle fleet's carbon emissions and reduce year on year

#### 9. Environmental Audits

Environmental audits will be conducted in accordance with company standards. Audit teams must contain at least one trained environmental auditor

## 10. Environmental Training

Environmental Training will be conducted in accordance with the above Training Requirements Matrix. A training plan will be generated to ensure correct training delivery

Training Requirements Matrix	High Level Brief	Direct Brief	Awareness Brief	Emergency Response Training	Auditor Training
Staff Type					
Directors	Yes				
Director Reports		Yes			
Managers			Yes		
Employees			Yes		
Sub-contractors			Yes		
Suppliers			Possible		
Customers			Possible		
Auditors					Yes

# 11. Reporting

The Environmental Representative will prepare and present an environmental report on a 6 monthly basis to the Senior Management Team covering the following:

- Results of internal audits and evaluation of legal compliance
- Any communications from interested parties including complaints
- The environmental performance of Corps Security
- The extent to which objectives and targets have been met
- The status of any corrective and preventive actions
- The follow up actions from previous management reviews
- Any changes in circumstance, including developments in legal and other requirements
- Any recommendations for improvement

## 12. Environmental Records

Environmental Records will be maintained in accordance with company requirements and for data analysis purposes.

The following table defines the Environmental records to be kept, the location and retention period

Record	Department	Kept for	Legal requirement
Audit Results	Quality	3 Years	
Environmental Incidents	Safety	3 Years	
Legionella Checks	Regional Director/Safety	On Going	Yes
<b>Asbestos Checks</b>	Safety	On Going	Yes
Special Waste disposal	IT	3 Years	Yes
Energy Usage	Purchasing	3 Years	
Controlled Waste Disposal	Purchasing	3 Years	Yes
Contractual Reviews	Quality	3 Years	
Facilities Asset Register	IT	3 Years	
<b>Environmental Training</b>	L&D	3 Years	
Aspects/Impacts Register	EMS/Safety	On Going	
Environmental Action List	Steering Group	3 Years	
Environmental Legislation Register	Quality	On Going	
Data Analysis	Safety	3 Years	
Management Review	Steering Group	3 Years	
Contractors Code of Practice returns	Purchasing/Safety	3 Years	
Security Waste	Purchasing	3 Years	
Energy Saving Plans	Purchasing	3 Years	

## 13. Analysis of Data

Appropriate data will be collected to determine the effectiveness of the Environmental Process and to support decisions on improvement programmes. This data will be analysed and may be submitted at Management review and will include:

- Environmental Action List
- Waste Management
- Audit Results
- Emissions
- Building Control

#### 14. Corrective and Preventative Actions

Any non-conformance and actions arising or found within the Environmental Process will be dealt with in accordance with company process and guidelines.

# 15. Environmental Organisation Diagram

