

Environmental Management System

Tel: 0161 998 4579



Sentrex Support Services	
Environmental Management System	

Procedure Title: Communication		Procedure No: 1
Date issued: 03.04.04	Last revised: 22.9.05	Revision No: 05.0
ISO 14001 reference: 4.4.3, 4.4.6		
O M reference: None		
Related procedures: <ul style="list-style-type: none"> • Procedure 19 –Maintenance Register Legislation • Procedure 13 - Training • Procedure 2 - Contractor management on-site • Procedure 4 - Emergency response • Procedure 7 - Environmental Complaints • Procedure 9 – Site Management • Procedure 18 - Environmental Aspects and Impacts • Procedure 20 - Objectives and Targets • Procedure 21 - Management Programme 		

1. Purpose

1.1 To set out roles and responsibilities in connection with communications, both internal and external, with regards to the policy and practices of Sentrex's environmental management system.

2. Scope

2.1 Communicating with employees on environmental matters.

2.2 Communicating with external interested parties, including suppliers, and clients on environmental matters, including matters pertaining to environmental legislative compliance.

2.3 Receiving, documenting and responding to relevant communications from external interested parties.

3. Definitions

3.1 Regulatory body – The Scottish Environment Protection Agency or any Local Authority who may have jurisdiction over particular environmental matters.

3.2 Official correspondence – any correspondence from Regulatory bodies or local authorities relating to environmental issues.

3.3 Interested party – individual or group concerned with or affected by the environmental performance of the company.

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3.4 Formal environmental communications – the passage of information regarding the organisation’s policies, practices or position, on matters relating to the environment and the company’s environmental management system, including compliance with environmental legislation.

3.5 Environmental complaint:

3.5.1 A documented critical observation or query about Sentrex environmental aspects, policy, management system or performance, from interested parties requesting a response or remedial action, or otherwise worthy of response.

3.5.2 A complaint, verbal or otherwise, from an employee regarding environmental aspects and their management and to which the employee requires a resolution and/or which requires management consideration.

3.5.3 A complaint, verbal or otherwise, from an employee regarding an internal air quality or temperature that is unacceptable for working in or that otherwise requires senior management consideration.

4. Responsibilities

4.1 The Managing Director is responsible for authorising and maintaining a record of formal environmental communications and the responses.

4.2 The Managing Director or a nominated representative, is responsible for authorising and maintaining a record of official correspondence relating to environmental policy and related issues.

4.3 The Managing Director or nominated representative, is responsible for providing advice on content of communications and responses to official correspondence relating to the environment.

4.4 Site Supervisors are responsible for compiling information relating to progress towards environmental objectives and targets.

4.5 Area Supervisors are responsible for ensuring that Sentrex’s environmental policy and employee responsibilities under the organisation’s environmental management system are communicated to employees within their line management function.

4.6 Site Supervisors , or nominated deputies, are responsible for reporting relevant site-based environmental performance information to the Area Supervisor.

4.7 Site Supervisors are responsible for communicating progress towards environmental objectives and targets to the building occupants.

4.8 Site Supervisors are responsible for ensuring prompt, accurate and satisfactory responses are delivered to regulatory correspondence and for reporting such events to the Area Supervisor.

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4.9 Site Supervisors are responsible for ensuring that all contractors, working on behalf of the Company, are informed of the Company's environmental policy and management system prior to commencement of their work.

4.10 It is the responsibility of all other employees to ensure that appropriate mechanisms are used to communicate with site visitors on issues relating to Sentrex's environmental policy and management system.

4.11 It is the responsibility of all employees to communicate issues affecting the Company's environmental policy, or the performance of the environmental management system, to their Line Manager.

5. Procedure

5.1 All formal environmental communications must be authorised.

5.2 Appropriate advice will be sought on the content and dissemination of all formal environmental communications.

5.3 Consideration will be given to the environmental attributes of the communication media. The use of paper for internal and external communications will be minimised in favor of the use of electronic media and the worldwide web.

5.4 All means of communication of relevant environmental information to employees and external parties shall be used, including but not limited to:

- notice boards
- employee newsletters
- employee handbooks
- workshops, seminars and other training events
- worldwide web and other electronic media
- informal discussions.

5.5 Where information for dissemination becomes available to the Site/Line Manager, it shall be communicated to employees at the next available site/team briefing or meeting.

5.6 Where employees have a particular requirement for improving their environmental awareness due to the nature of their activities, suitable workshops will be organised.

5.7 Any contractor working on Sentrex's sites will be made aware of the organisation's environmental policy, relevant procedures and the standards of care with regards to the environmental protection expected under the Environmental Management System, before any work commences.

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5.8 All correspondence from regulatory authorities relating to suspected environmental offences will be treated as a complaint and prioritised for urgent action, in accordance with the relevant procedure. In all cases, the Managing Director will be informed immediately and action will be taken within 24 hours, or as soon as is reasonably practicable.

5.9 The Managing Director, or nominated representative, will be informed of all relevant communications from external interested parties. Where necessary, a response will be made within 28 days, or within the specified timescale, by the initial addressee if possible.

5.10 External interested parties will be periodically informed of developments in the environmental management system.

5.11 Correspondence falling into the category of a complaint or incident will be dealt with in accordance with the requirements of both this procedure and the procedure for Environmental Complaints.

5.12 Site Supervisors will retain records of all correspondence received and distributed to regulatory authorities for a period of five years.

5.13 A written summary of progress towards environmental objectives and targets will be compiled and disseminated by the Managing Director on a regular basis.

6. Further References

None

7. Record Forms

None.

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**Environmental Management System Documentation
Volume 2 Environmental Management Procedures Manual
Summary – Purpose and Responsibilities**

COMPONENT	PURPOSE	RESPONSIBILITIES
Part A – Operational Procedures		
1 . Communications	To set out roles and responsibilities in connection with communications, both internal and external, with regards to the policy and practices of Sentrex Support Services' Environmental Management System.	③ Managing Director ③ Site Managers ③ Line Managers /Area Supervisors ③ All employees
2 . Contractor management on-site	1.1To define the methods by which contractors will be managed whilst working on Sentrex Support Services sites and premises.	③ Contract Managers ③ Site Managers ③ All persons
3 . No procedure		
4 . Emergency response	1.1To set out roles and responsibilities in connection with implementation of Sentrex Support Services response to an environmental incident. To provide guidance on actions to be taken in response to an environmental incident.	③ Managing Director ③ Site Managers ③ Line managers/ Area Supervisors ③ All persons
5 . Energy Management	To provide an overview of the responsibilities relating to the provision and use of energy services and the management of energy consumption. This procedure sets out the requirements and actions necessary to implement the Environmental Policy.	③ All employees ③ Site Managers ③ Area / Site supervisors
6 . No procedure		

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COMPONENT	PURPOSE	RESPONSIBILITIES
7. Environmental Complaints	To define the process for recording and responding to environmental complaints received by Sentrex Support Services	③ Complaint recipients ③ Managing Director ③ Line Managers / Area Supervisors ③ Site Managers
8. No procedure		
9. Management of the Estate	To set out the requirements relating to the general management of the Estate in meeting the aims of Sentrex Support Services Environmental Policy.	③ Site Managers ③ All persons
10.No procedure		③
11.Purchasing in-house	The purpose of this procedure is to provide an overview of the responsibilities and duties relating to Sentrex Support Services 'in- house' purchasing in fulfilling the requirements of the Environment Policy.	③ All persons ③ Buyers
12. Resources/Consumables Use	To provide an overview of the responsibilities and practices relating to the use of resources and consumables.	③ Managing Director ③ Line Managers / Area Supervisors
13.Training	This procedure covers the identification of environmental training needs, the provision of training and maintenance of records for all persons working for, and on behalf of, the Company.	③ Managing Director ③ Line Managers / Area Supervisors
14.Transport and Travel	1.1The purpose of this procedure is to describe the measures involved in the reduction of pollution and reduction of natural resource depletion from transport and travel activities.	③ All Directors ③ All Managers
15.Waste Management	To define the processes by which waste is managed by Sentrex Support Services	③ Managing Director ③ Site Managers

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COMPONENT	PURPOSE	RESPONSIBILITIES
16. Water Management	<p>To provide an overview of the responsibilities relating to the provision of water services, maintaining water hygiene, controlling consumption and ensuring appropriate discharge to sewer systems.</p> <p>To set out the requirements and actions required for implementation of the Environmental Policy.</p>	<p>③ All employees</p> <p>③ Site Supervisor/ Managers</p> <p>③ Managing Director</p>
17. No procedure		③
Part B – EMS Procedures		
18. Maintenance of Register of Environmental Aspects and Impacts	<p>To define the method for identifying the environmental aspects and impacts associated with the activities, products and services of the Sentrex Support Services.</p> <p>To define a method for determining the significance of the identified environmental aspects and impacts.</p> <p>To define the method for maintaining a register of environmental aspects and impacts to demonstrate compliance with the requirements of ISO 14001.</p>	<p>③ Managing Director</p> <p>③ All employees</p>
19. Maintenance of Register of Applicable Legislation and Other Requirements and evaluation of compliance	To identify, maintain and anticipate all legal and other requirements relevant to the environmental aspects of Sentrex Support Service's activities, products and services, so as to ensure awareness of and compliance with all such requirements.	<p>③ Managing Director</p> <p>③ Site Managers</p> <p>③ All employees</p>
20. Maintenance of Objectives and Targets	To establish and maintain environmental objectives and to set targets for achievement	<p>③ Managing Director</p> <p>③ Site Managers</p> <p>③ Line Managers / Area Supervisors</p> <p>③ All employees</p> <p>③ Environmental Working Groups</p>

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COMPONENT	PURPOSE	RESPONSIBILITIES
21. Environmental Management	Objectives and Targets require a programme detailing how they will be achieved. This procedure assigns responsibilities for the Management Programme.	③ All Company Directors
22. Document Control	To establish and maintain a system whereby all issued environmental documents are controlled through a system of authorisation and the use of issue date, revision date and revision numbers. Also requires a system of control for environmental documents of external origin.	③ Managing Director ③ Website Manager ③ Author(s) of procedures/documents.
23. Non-conformance and corrective action	This procedure sets out the requirement for defining responsibility and authority for handling and investigating non-conformance, taking action to mitigate any impacts caused and for initiating and completing corrective and preventive action.	③ Person (s) detecting a non-conformance ③ Site Managers ③ Line Managers ③ Managing Director
24. EMS Audits	To determine whether Sentrex Support Service's Environmental Management System (EMS) conforms to planned arrangements for environmental management, including the requirements of the international standard ISO 14001. To determine whether the environmental management system has been properly implemented and maintained. To provide information on the results of audits to management.	③ Managing Director ③ Site Managers ③ Line Managers
25. Management Review	Outlines the scope of a formal management review process, chaired by the Managing Director. The review comprises a comprehensive assessment of the ongoing suitability and achievements of the EMS.	③ Managing Director ③ Site Supervisors /Managers

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Procedure Title: Purchasing		Procedure No: 11
Date issued: 03.04.00	Last revised: 23.7.05	Revision No: 05.0
ISO 14001 reference: 4.4.6		
OM reference:		
Related procedures: <ul style="list-style-type: none"> • Procedure 24 - EMS Audit • Procedure 12 - Resource/Consumables Use • Procedure 14 - Transport and Travel • Procedure 5 - Energy Management • Procedure 16 - Water Management • Procedure 2 - Contractor Management on-site 		

1. Purpose

1.1 The purpose of this procedure is to provide an overview of purchasing requirements to ensure compliance with Sentrex's environmental policy and management system.

2. Scope

2.1 This procedure covers all types of purchasing of both goods and services.

3. Definitions

3.1 EMS – Environmental Management System 3.2

EMAS – Eco-Management and Audit Scheme

3.3 Environmentally preferable products or services – those products and services that are less harmful to human health and the environment when compared with competing products that serve the same purpose (DETR, 1997, Green Guide to Buyers). Definitions

3.4 Vendor qualification criteria - the skills, experience and operating standards required of vendors.

3.5 Specification criteria - the particular requirements to be specified for any contract.

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4. Responsibilities

4.1 It is the responsibility of the Managing Director to ensure that all procurement activities are conducted in accordance with Sentrex Support Service's EMS.

4.2 It is the responsibility of the employee managing the purchase or engaged in sub-contracting tenders to ensure that environmental criteria are applied in selecting goods or services, or specifying work, where it is legitimate to do so in accordance with the applicable legislation.

4.3 It is the responsibility of the Managing Director, or nominated representative, to provide advice as requested.

4.4 It is the responsibility of the Managing Director to investigate approaches to reconciling environmental and public procurement objectives.

4.5 It is the responsibility of all persons to ensure that they comply with the provisions of this procedure in so far as they relate to matters within their control.

5. Procedure

5.1 Vendor qualification criteria

5.1.1 All contractors shall demonstrate and ensure that all staff they employ in any work for the Company have sufficient knowledge and experience for the work being carried out and are capable of performing their duties in a manner compatible with the Sentrex environmental policy.

5.1.2 All contractors shall demonstrate that they have suitable management systems to control their site work and associated activities in accordance with the Company's environmental policy and management system.

5.2 Specification

5.3 Where they are relevant to the function of the product or delivery of the service, appropriate environmental criteria will be included in all specifications for products and services. The inclusion of environmental criteria in choosing suppliers will be made explicit to all tenderers.

5.3.1 A copy of the Company Environmental Policy will be distributed to all invited tenderers.

5.3.2 Where relevant, use will be made of environmental labels or eco-labels to guide the preparation of specifications incorporating environmental criteria.

5.3.3 All specifications will include a requirement that any packaging used must conform with the requirements of the Packaging (Essential Requirements) Regulations 1998 and as such be minimal to protect the

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product during delivery and installation.

5.3.4 In preparing specifications, due regard will be given to the environmental impacts of the product or service arising during use and disposal in order to support the Agency's environmental policy and objectives and targets.

5.3.5 A specification will be prepared for all works to include the scope of work and any particular environmental requirements and safety precautions to be taken, including reference to noise, dusts and other hazardous substances.

5.3.6 All specifications should clearly define the precise scope of the tasks, the area of work activity, safe access arrangements, emergency procedures and site contracts.

5.3.7 All specifications should define the monitoring procedures that will be applied to the work of any contractor, and in particular their compliance with site environmental requirements and arrangements for off-site disposal of waste.

5.3.8 Wherever possible, specifications will require any waste generated in performing the contract to be removed off-site in accordance with applicable legislative requirements.

5.4 Tender Evaluation

5.4.1 Whole-life costs will be used to evaluate all tenders, where applicable.

5.4.2 For products or services consuming energy and other resources and producing waste, an evaluation of the life-cycle impacts and their effects on the company's environmental policy, objectives and targets will be conducted, documented and considered within the assessment of value for money.

5.4.3 Subsequent to paragraph 5.3.2, for purchases that are estimated to significantly adversely affect the achievement of the environmental objectives and targets and/or undermine the environmental policy, the Managing Director shall be informed before the acceptance of the offer.

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5.4.4 Sufficient weight must be given to the environmental criteria to enable the Managing Director to be satisfied that the successful tenderer will not undermine Sentrex's environmental policy, management system or performance.

5.4.5 On satisfaction of the above condition and **all else being equal**, the following hierarchy should be used (in order of preference) to guide selection:

- the tenderer has a third-party certified environmental management system
- the tenderer operates under an uncertified environmental management system
- the tenderer has an environmental policy and operational procedures/working instructions but no formal environmental management system
- the tenderer has no formal environmental policy but is committed to supporting the company's environmental policy and management system.

5.5 Purchasing

5.5.1 All purchases will be made in accordance with the environmental policy.

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5.5.2 Where they have been identified, environmentally preferable products or services will be purchased whenever they offer value for money.

5.5.3 Consideration will be given to the preferential purchase of recycled products (e.g. recycled paper, recycled toner cartridges, recycled oil, etc.) and to the most energy efficient products.

5.5.4 The company's supply chain will be periodically surveyed for its environmental engagement.

5.5.5 Suppliers will be encouraged to improve their environmental performance through periodic seminars and workshops.

5.5.6 Purchasing procedures will be developed and amended as appropriate to specify both 'green' products and 'green' suppliers.

5.5.7 Material published or printed will be, where possible, amenable to recycling (i.e. does not contain plasticised finishes).

5.5.8 Only timber and timber products from sustainably managed sources will be purchased.

6. Record Forms

None.

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Procedure Title: Resource/Consumables Use		Procedure No: 12
Date issued: 03.04.00	Last revised: 16.8.05	Revision No: 05.0
ISO 14001 reference: 4.4.6		
O M reference: None.		
Related procedures: <ul style="list-style-type: none"> ■ Procedure 19 - Maintenance of Register of Applicable Legislation and Other Requirements ■ Procedure 13 - Training ■ Procedure 11 - Purchasing in-house ■ Procedure 15 - Waste Management ■ Procedure 9 – Site Management 		

1. Purpose

1.1 To provide an overview of the responsibilities and practices relating to the use of resources and consumables used by Sentrex Support Services.

2. Scope

2.1 This procedure covers the requirement to ensure that resources and consumables, additional to utilities, are used in a responsible manner to minimise the environmental impact.

3. Definitions

3.1 Resources - assets of all kinds employed during the activities of Sentrex Support Services.

3.2 Consumables - disposable items that are likely to be replaced on a frequent basis.

3.3 Environmentally preferable products – products that are less harmful to human health and the environment when compared with competing products that serve the same purpose.

4. Responsibilities

4.1 The Managing Director is responsible for providing guidance on environmentally preferable products.

4.2 Site Supervisor and Site Managers are responsible for ensuring that instructions to comply with this procedure are issued to all their staff and that checks and reviews are maintained and documented.

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4.3 Site Managers /Supervisor are responsible for monitoring and reporting consumption of paper and toner cartridges to the Managing Director .

4.4 Site Managers are responsible for the management of cleaning equipment and materials.

4.5 The Managing Director is responsible for the overall management of IT and related equipment.

4.6 The Managing Director is responsible for collating monthly paper data for the and for maintaining records.

4.7 It is the responsibility of all persons to ensure that they comply with the provisions of this procedure in so far as they relate to matters within their control.

5. Procedure

5.1 Appropriate resources will be provided for the required tasks to allow efficient operation with minimum wastage.

5.2 Use of cleaning equipment, materials and other equipment will be restricted to authorised users, and clear instructions will be given in correct and efficient use.

5.3 All equipment will be configured to make full use of power-saver modes whenever appropriate and switched off when not in use.

5.4 All consumables will be allocated in accordance with the Consumables policy (April 2005), attached as Annex A to this procedure.

5.5 The purchase and use of cleaning chemicals will be minimised and will be strictly in line with the instructions provided by the manufacturer and COSHH legislation.

5.6 The use of plastic containers containing cleaning fluids will be minimised and any requisition should consider whether a larger container would be more appropriate and could avoid the use needless packaging.

5.7 Environmental effects should be considered when purchasing all materials and consideration should be given to products that will carry out the job as effectively without damage to the environment.

5.8 Products containing CFC's are to be avoided.

5.9 Recycled Janitorial paper products are to be used in favor of the use of any other paper products.

5.10 Recycled cloths, mop heads, dusters etc. are to be purchased in favor of any other products.

5.11 Electrical consumption of machines will considered when purchasing cleaning

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equipment and whole of life costs considered for all cleaning equipment.

5.12 The use of paper for internal and external communications will be minimised in favor of the use of electronic media and the worldwide web.

5.13 To reduce the impact of paper usage, double-sided photocopying printing will be adopted whenever possible and practical.

5.14 Paper with a recycled content will be utilized, wherever practical.

5.15 Envelopes will be re-used for internal mail, wherever possible.

5.16 The quantity of paper consumed and ordered will be recorded monthly.

5.17 The number of toner cartridges consumed and ordered will be recorded monthly. Print Cartridges will be sent to CHAS Scotland for recycling.

5.18 Non-confidential paper waste will be re-used for scrap or otherwise recycled, wherever practical. Confidential paper waste will be shredded prior to disposal.

5.19 Stationery products with a recycled content, including paper and toner cartridges, will be used wherever possible, in accordance with the procedure on in-house purchasing.

5.20 Items that cannot be re-used, recycled or have become surplus to requirements shall be classified accordingly and dealt with in line with the waste management procedure.

5.21 All resources and consumables shall be suitably protected, stored and maintained to minimise wastage and the potential for corrosion, leakage or other causes of uncontrolled releases.

5.22 All tasks will be reviewed and monitored on a regular basis to check that prohibited substances (*e.g. substances on the "The Red List", CFCs*), are not being used, and whether alternative procedures are required to control the use of excessive or undesirable materials.

5.23 The use of battery powered equipment will be avoided wherever possible, for example by choosing solar, mechanical or mains voltage electrical products.

5.24 Where batteries are essential, preference will be given to rechargeable batteries (*e.g. nickel metal hydride NiMH*). Batteries containing mercury (in excess of 0.0005% by weight) will not be used, and those containing other environmentally hazardous materials (*e.g. lead, cadmium*) should be avoided.

5.25 Spent batteries should be recycled *if a suitable outlet can be found*, or otherwise disposed of safely.

5.26 Broken mobile phones are to be returned to the office and sent to Children's Hospice Association Scotland for refurbishment

5.27 Spent batteries in portable electrical equipment will be returned to office locations for appropriate disposal.

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6. Further References

7. Record Forms

None.

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Annex A

Purchasing policy

1. Overall aim

This policy describes how equipment and consumables will be purchased and allocated to staff working in Sentrex sites. It supports the Company's environmental policy and environmental purchasing policy.

The aim of this policy is to ensure that all staff have sufficient access to equipment and consumables whilst ensuring that the total is kept to a minimum to ensure resource efficiency and compliance with the Company's existing policies, procedures and targets (e.g. to reduce electricity, chemical and paper consumption).

2. The policy

- All cleaning equipment and machinery will be purchased based upon sound environmental principles and whole life costings □
 - All machines are a shared resource. No site should hold machinery that is not in regular use.
- Products containing CFC's are not to be used under any circumstances
 - The purchase of bleach (chlorine) is to be avoided unless a clear practical case has been made for its use on any site.
- Chemicals should be purchased in quantities that reduce the use of plastic containers and packaging.
- Liquid Soap Dispensers purchased must be capable of refilling without the need for plastic cartridges.
- Where powdered forms of cleaning agents are available liquid forms should be avoided.
- Recycled janitorial paper products are to be favored and will be purchased based upon sound environmental principles and whole life costings.
- Recycled cleaning cloths and dusters will be purchased based upon sound environmental principles and whole life costings.
- Recycled mop heads are to be favored will be purchased based upon sound environmental principles and whole life costings.
- Recycled bin liners and Black Bags are to be favored and will be purchased based upon sound environmental principles and whole life costings.

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- One colour printer will be provided per team. If there are more than eight people in a team in one office, a second black and white printer can be provided.
- Double-sided printers will be placed where there is greatest environmental savings.
- Where appropriate recycled printer cartridges and printers that take recycled printer cartridges will be purchased.
- All requests for printer cartridges, including homeworker requirements must go via the Managing Director.
- All printer cartridges are to be recycled. This includes printer cartridges used by homeworkers which should be returned to the nearest office.

3. Implementation

The Managing Director will implement the policy, in consultation with the Supervisors and Managers where relevant.

4. Environmental appraisal

An environmental appraisal of this policy has been undertaken. The outcome of the appraisal is that the policy will produce a number of environmental benefits.

5. Evaluation and review

The policy will be periodically reviewed to ensure it is dealing with the issues it was designed to address.

6. Distribution

The policy will be distributed to all staff via the minutes of site meetings held in each office.

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Procedure Title: Training		Procedure No: 13
Date issued: 03.05.03	Last revised: 22.6.05	Revision No: 05.0
ISO 14001 reference: 4.4.2, 4.4.6		
O M reference: None		
Related procedures: <ul style="list-style-type: none"> ■ Procedure 19 - Maintenance of Register of Applicable Legislation and Other Requirements ■ Procedure 24 - Internal EMS Audit ■ Procedure 12 - Resources/Consumables Use ■ Procedure 1 - Communications ■ Procedure 4 - Emergency response ■ Procedure 7 - Environmental Complaints 		

1. Purpose

1.1 This procedure covers the identification of environmental training needs, the provision of training and maintenance of records for person(s) working for, or on behalf of, Sentrex Support Services.

2. Scope

2.1 This procedure covers the requirement to provide appropriate environmental training for all the Company's employees, as well as those persons working on behalf of the Company.

2.2 It covers the provision of two types of training - 'competency' and 'awareness'.

3. Definitions

3.1 Training needs – a gap in the skill, knowledge or behavior required to reach a given standard

3.2 Training plan – the programme of activities designed to satisfy the training needs

3.3 Training record – the means by which completed training needs are recorded.

3.4 Competency training – the training of employees to enable them to fulfill their duties in a competent manner and consistent with the aims of the environmental policy and management system.

3.5 Awareness training – raising the environmental awareness of employees to increase their understanding of environmental issues and the relevance of those issues to Sentrex's activities, products and services.

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4. Responsibilities

4.1 The Managing Director working with Line Managers and Supervisors , is responsible for the identification of training needs of the Company.

4.2 Line Managers are responsible for reporting any highlighted training needs and ensuring that personnel (including external contractors) under their control are appropriately trained to complete their tasks.

4.3 The Managing Director is responsible for the development and implementation of an environmental training plan, as appropriate.

4.4 It is the responsibility of all employees to notify their Line Manager if they need specific environmental training that has not been provided as part of a corporate programme, or been previously identified.

4.5 It is the responsibility of all employees to ensure that they comply with the provisions of this policy in so far as they relate to matters within their control.

5. Procedure

5.1 All members of staff will receive periodic environmental awareness training, in an appropriate format according to their role and department.

5.2 Key personnel, such as Supervisors, will receive additional competency training to enable them to fulfill their specific duties in a competent manner.

5.3 Refresher courses, particularly for Site Managers or their nominated representatives with responsibility for management and record keeping in accordance with the EMS, will be provided as appropriate.

5.4 The training requirements of all employees will be assessed regularly in accordance with wider organisational policy, the results of internal audits and the management review process.

5.5 All new recruits will receive appropriate information about the Company's environmental policy and management system and their duties as employees.

5.6 All persons working on behalf of the Sentrex Support Services will receive environmental awareness and competency training, as appropriate to their role and responsibilities.

5.7 Environmental training will be provided to make persons working for, or on behalf of, the Company aware of:

5.7.1 the importance of conformance with the environmental policy and procedures and with the requirements of the environmental management system;

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5.7.2 the significant environmental impacts, actual or potential, of their work activities and the environmental benefits of improved personal performance;

5.7.3 their roles and responsibilities in achieving conformance with the environmental policy and procedures and with the requirements of the Environmental Management System, including emergency preparedness and response requirements;

5.7.4 the potential consequences of departure from specified operation procedures.

5.8 At the conclusion of all training, a Training Attendance List should be completed and signed. Training Attendance Lists will be completed for all in-house courses and are available on request from the Head Office.

5.9 The information from the completed Training Attendance Records is added to the training history of the individual employee on the training database.

6. Further References

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7. Record Forms

None.

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Procedure Title: Transport and Travel		Procedure No: 14
First issued: 03.04.04	Last revised: 23.9.05	Revision No: 05.0
ISO 14001 reference: 4.4.6		
O M reference: None.		
Related procedures: <ul style="list-style-type: none"> • Procedure 19 - Maintenance of Register of Applicable Legislation and Other Requirements • Procedure 11 - Purchasing • Procedure 5 - Energy Management • Procedure 7 - Environmental Complaints 		

1. Purpose

1.1 The purpose of this procedure is to describe the measures involved in the reduction of pollution and natural resource depletion from transport and travel activities of Sentrex Support Services.

2. Scope

2.1 This procedure relates to business travel, Sentrex vehicles: vans and cars, company lease cars, hired cars, deliveries to sites and any other visitors to Sentrex premises.

3. Definitions

3.1 Travel Plan – a set of measures tailored to suit the individual circumstances of different locations, but with the common aim of reducing the impacts of travel *to work* and transport activity *during work*.

3.2 Tele-working – working from a location remote from the main place of work, without compromising the ability of employees to fulfill their employment duties.

3.3 Suppliers – organisations or companies who provide a service or product for use by Sentrex Support Services and its employees.

3.4 Prospective vehicle list – list of motor vehicles for which an employee obtains a cost quote for the purchase of a company vehicle.

3.5 Visitor vehicle episode – the occurrence of a visitor arriving at any site via a motor vehicle.

3.6 Delivery episode – the occurrence of a delivery.

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3.7 Business miles – authorised travel by motor vehicle on company business, through use of owned, leased, hired or personal motor vehicles.

4. Responsibilities

4.1 The Managing Director, or nominated representative, has overall responsibility for the development and implementation of a Travel Plan.

4.2 All members of the Management have responsibility for the approval of lease cars and the use of private vehicles for business purposes.

4.3 The Office Manager is responsible for assembling relevant travel data (e.g. business miles travelled).

4.4 All Line Managers have responsibility for the approval of travel mode, including the use of hire cars.

4.5 Site Supervisors are responsible for the collation and quarterly reporting of data on visitor-vehicle episodes and delivery episodes to the Office Manager.

4.6 Employees being visited are responsible for ensuring all visitors are signed in, indicating where applicable, vehicle use.

4.7 All employees have a responsibility to comply with the relevant parts of this procedure.

4.8 All employees are responsible for promptly submitting their travel expenses (including mileage data) via the expenses system

4.9 The Managing Director, or nominated representative, is responsible for reviewing the effectiveness of this procedure and for reviewing existing and new Company policies to determine travel impacts that may arise and the implications of these in terms of the objectives and targets of the Company's Travel Plan.

5. Procedure

5.1 The Travel Plan will be maintained and reviewed on an annual basis.

5.2 A policy on business travel will be maintained.

5.3 Employees will be made aware of the environmental impacts of various modes of travel.

5.4 Hire cars will only be authorised in the event that the use of public transport is deemed impractical or is estimated to increase journey time to an unacceptable level. The group of hire car selected will be appropriate to the travel need and the following:

5.4.1 published CO₂ emissions for any vehicles for which the employee obtains a lease cost quotation

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5.4.2 average fuel consumption based upon manufacturer's published data for any vehicles for which the employee obtains a lease cost quotation.

5.5 Available data on business mileage by car will be collated for analysis and reporting on a quarterly basis.

5.6 The average combined cycle fuel consumption of the company vehicle fleet will be assessed on a quarterly basis, if data is readily available.

5.7 Suppliers will be informed of the Sentrex's commitment to a Travel Plan, where appropriate.

5.8 Directions to all locations issued to site visitors will include public transport arrangements.

5.9 The choice of new office premises and the venue for external meetings, training seminars, conferences and other similar events will include consideration of travel and transport implications for visitors, deliveries and employees.

5.10 Welfare facilities (such as lockers, showers, changing rooms, etc.) will be provided, where possible, so as to encourage cycling and walking to work.

5.11 Each delivery to sites will be recorded

5.12 Vehicle-sharing will be promoted and monitored.

5.13 Revisions to existing Company policies, and new policies that are introduced, should be reviewed to determine travel impacts that may arise and the implications of these in terms of the objectives and targets of the company's Travel Plan.

6. Further References

None

7. Record Forms

None.

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Procedure Title: Waste Management		Procedure No: 15
Date issued: 03.09.04	Last revised: 13.11.05	Revision No: 05.1
ISO 14001 reference: 4.4.6		
O M reference: None.		
Related procedures:	<ul style="list-style-type: none"> ■ Procedure 12 - Consumables/Resource Use ■ Procedure 19 - Maintenance of Register of Applicable Legislation and Other Requirements ■ Procedure 4 - Emergency Response ■ Procedure 2 - Contractor management on-site ■ Procedure 5 - Energy Management 	

1. Purpose

1.1 To define the processes by which waste is managed by Sentrex Support

Services. **2. Scope**

2.1 This procedure relates to the production, handling, keeping, safe storage, transport, collection and disposal of all waste generated on Sentrex Support Service's sites.

2.2 Waste types covered include:

- waste arising from cleaning process
- redundant cleaning products
- office waste
- redundant product samples
- lamps
- batteries
- redundant machinery/equipment
- catering waste
- waste from other maintenance activities
- toner cartridges
- redundant cleaning equipment
- redundant IT equipment

3. Definitions

3.1 The definition of waste originates from a number of sources:

- Controlled Waste Regulations 1992: define "controlled" waste

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- Waste Management Licensing Regulations 1994: define “directive” waste and amend the definition of controlled waste to not include anything that is not directive waste
- Hazardous Waste Regulations 2005: define “hazardous” waste.

3.2 Controlled waste refers to clinical, household, industrial and commercial wastes, as regulated by the duty of care and the waste management licensing regime made under the Environmental Protection Act 1990.

3.3 Directive waste refers to any substance or object that:

- is listed in Part II of Schedule 4 to the Waste Management Licensing Regulations 1994 (see below)
- has been discarded by the holder or he intends to/is required to discard it
- the discarding will make the substance fall out of the normal commercial cycle or chain of utility

Part II

- production or consumption residues not otherwise specified below
- off-specification products
- products whose date for appropriate use has expired
- material spilled, lost or having undergone other mishap, including any materials equipment etc. contaminated as a result of the mishap
- materials contaminated or soiled as a result of planned actions (e.g. residues from cleaning operations, packaging materials, containers etc.)
- unusable parts (e.g. reject batteries, exhausted catalysts etc.)
- substances which no longer perform satisfactorily (e.g. contaminated acids, contaminated solvents, exhausted tempered salts etc.)
- residues from industrial processes (e.g. slags, still bottoms etc.)
- residues from pollution abatement processes (e.g. scrubber sludge's, bag house dusts, spent filters etc.)
- machining or finishing residues (e.g. lathe turnings, mill scales etc.)
- residues from raw materials extraction and processing (e.g. mining residues, oil field slopes etc.)
- adulterated materials (e.g. oils contaminated with PCBs etc.)
- any materials, substances or products whose use has been banned by law
- products for which the holder has no further use (e.g. agricultural, household, office, commercial and other shop discards etc.)
- contaminated materials, substances or products resulting from remedial action with respect to land
- any materials, substances or products which are not contained in the above categories”.

3.4 The definition of “directive” waste stems from the EU framework Directive on waste (75/442/EEC). Most “directive” wastes that are household, commercial or industrial are defined as “controlled” wastes, though some “directive” wastes are specifically excluded from “controlled” wastes, e.g. wastes from agricultural premises.

3.5 Household wastes - wastes from a domestic property, caravan, residential

home, educational establishment, hospital or nursing home.

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3.6 Industrial wastes - waste from factory or any premises used for or in connection with the provision of public transport, the public supply of gas, water, sewerage or electricity services, the provision to the public of postal or telecommunications services.

3.7 Commercial wastes - waste from premises used for trade or business, i.e. waste produced by Sentrex Support Services, or for the purposes of sport, recreation or entertainment.

3.8 Clinical waste - waste from human or animal tissue, blood, excretion, body fluids, pharmaceutical products, swabs, dressings, syringes, needles or sharps that is not otherwise classified as hazardous waste.

3.9 Hazardous wastes are those wastes listed in the Special Waste Amendment (Scotland) Regulations 2004. Some wastes on the List are hazardous irrespective of the concentration of dangerous substances (absolute entries) whereas others (termed mirror entries) will be hazardous only if they contain dangerous substances at levels above appropriate thresholds. Advice on how to interpret the definition and classification of hazardous waste can be found in the Scottish Environmental Protection Agency's Website at; <http://www.sepa.org.uk/guidance/index.htm>

3.10 The Scottish Executive also has the power to exceptionally classify a waste stream or consignment as hazardous under the Hazardous Waste Regulations 2005.

3.11 Hazardous wastes produced by Sentrex Support Services may include:

- waste chemicals
- batteries (e.g. lead acid batteries, or significant volumes of batteries containing mercury or cadmium)
- waste oils
- computer monitors
- paint
- lead
- fluorescent tubes
- refrigerants.

3.12 Extraneous articles – articles placed in a waste container not covered by the description of waste cited on the *waste consignment note*.

3.13 Waste transfer/consignment note – regulatory requirement to complete, sign and keep a transfer/consignment note that contains a detailed description of the waste that is being transferred, and information about the parties to the transfer.

3.14 The Duty of Care Regulations cover the:

- production
- import

- carriage

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- storage
- treatment
- disposal

of Controlled Waste.

4. Responsibilities

4.1 The Managing Director is ultimately responsible for ensuring that waste is managed in accordance with legislative requirements.

4.2 Site Supervisors /Managers, or nominated representatives, are responsible for compliance with this procedure.

4.3 The Site Manager is responsible for arranging the disposal of redundant IT equipment in accordance with the provisions of this procedure.

4.4 The Site Manager is responsible for arranging the disposal of redundant product samples in accordance with the provisions of this procedure.

4.5 Contractors have a responsibility to ensure that all waste they produce during their activities on Sentrex sites is managed safely and in accordance with legislative requirements.

4.6 It is the responsibility of all employees to segregate and store waste in the appropriate containers and designated areas.

4.7 It is the responsibility of employees engaged, or planning to undertake, activities likely to generate an additional waste burden to pre-notify the Site Manager.

5. Procedure 5.1

Waste Production

5.1.1 As far as is reasonably practicable, waste management and waste minimisation will be practiced through a three tier approach:

- reduce
- reuse
- recycle

5.1.2 Waste produced by routine cleaning activities shall be minimised through re-use and recycling wherever practicable.

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5.1.3 Waste produced as a result of the receipt of product samples shall be minimised by only requesting those product samples that are essential to effectively conduct an evaluation of the product or execute a contract.

5.1.4 Waste produced from plant and equipment shall be minimised through its efficient operation and maintenance in accordance with manufacturer's instructions.

5.1.5 Waste from refurbishment and other construction activities will be minimised by appropriate design specifications.

5.1.6 The volume of waste produced on sites shall be monitored through visual inspection of the content of waste containers and recording of waste quantity produced by type of waste.

5.1.7 Activities likely to produce additional or non-routine waste will be pre-notified to the site manager by at least 12 hours.

5.1.8 In accordance with the Hazardous Waste Regulations 2005 the Scottish Environmental Protection Agency will be notified annually of any premises that produces more than 200kg* hazardous waste a year (NB: if less than 200kg/year is produced at any of premises, the premises will be exempt from this requirement). Current registration details are as follows:

SNO / 039869

*200kg of waste equates to approximately:

- 10 small TVs;
- 14 lead acid batteries
- 500 fluorescent tubes
- 5 small domestic fridges

5.2 Waste Handling and Storage

5.2.1 Items classified as waste will be handled in accordance with the requirements of duty of care legislation.

5.2.2 Waste produced through the routine management of outside areas shall be minimised through the prevention of litter accumulation, and through on-site composting of ground waste, wherever practicable.

5.2.3 All waste will be stored in a safe and secure manner pending collection by third party contractors for recovery, recycling or disposal.

5.2.4 All waste will be stored in a manner that prevents its escape.

5.2.5 Wherever possible, access to waste containers will be restricted to designated employees of Sentrex Support Services and contracted waste collection contractors.

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5.2.6 Liquid wastes shall be stored in containers appropriate for the properties of the waste. Such containers will be stored in a suitably bundled area.

5.2.7 Waste produced by contractors will be stored in designated areas and in dedicated containers as provided by the contractor, unless otherwise agreed by the Site Manager. Contractors will demonstrate a duty of care over any waste produced by them on the site.

5.2.8 Waste that is not described on the sites' annual waste transfer note, will be stored separately from routine waste pending special arrangements for collection. Only waste that is described in the sites' waste transfer note will be disposed to the containers provided by the waste collection contractors.

5.2.9 Hazardous waste will be stored in a container suitably designed to minimise the risk of harm from the waste's hazardous properties.

5.2.10 In accordance the Hazardous Waste Regulations 2005, the mixing of different categories of hazardous waste is prohibited, as is the mixing of hazardous waste with non-hazardous waste.

5.2.11 Redundant equipment shall be appropriately labeled and stored securely pending disposal.

5.2.12 At locations where provision is made for the segregation of paper, cardboard, plastics, aluminum, glass or wood, these containers will be clearly and appropriately labeled.

5.3 Transportation, Disposal and Collection

5.3.1 Waste produced on site by the Sentrex Support Services will only be transported off site by a registered waste carrier. A copy of the waste carrier's valid registration certificate must be retained at all sites and historical records of waste transfer retained for five years.

5.3.2 Copies of valid waste management licenses for the final destination of all wastes shall be maintained on sites and records retained for five years.

5.3.3 Controlled waste will be segregated at source, into wastes requiring disposal and those for which recycling has been arranged. An estimate of the weekly volume of waste for off-site disposal/recycling will be recorded. The estimate will be based on a visual examination of the quantity of waste in waste storage containers prior to their removal off-site.

5.3.4 Containers will be inspected for extraneous articles within at least 24 hours before collection, where possible and practical. Extraneous articles will only be removed where it has been identified that it is safe to do so.

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5.3.5 All waste transferred off-site will be accompanied by a waste transfer note, completed and containing information in accordance with the relevant regulatory requirements and codes of practice. For regular collections from the same source, a 'season ticket' may be used to cover all such transfers during a period not exceeding 12 months. Copies of waste transfer/consignment notes will be available at all times and retained for five years.

5.3.6 In relation to collections of hazardous waste, the waste transfer note is referred to as a consignment note. Parts A and B of a consignment note (available from the Scottish Environmental Protection Agency) are to be completed by the Site Manager. If this task is delegated to the waste carrier, the Site Manager is still responsible for ensuring the note has been completed correctly. The consignment note must include the correct waste code as listed in the Regulations.

5.3.7 Each movement of hazardous waste requires a unique consignment code. This is generally provided by the producer (Agency) but can be provided by the consignor (waste carrier). The waste carrier should complete part C of the consignment note, and the Site Manager should sign part D. The Site Manager should retain one copy of the consignment note, and give the remaining copies to the waste carrier.

5.3.8 Redundant equipment will be sent for recycling to an approved contractor wherever practical.

5.3.9 No waste (including redundant IT equipment and waste product samples) will be stored on Sentrex premises for more than 6 months.

5.3.10 For all hazardous waste, the receiver of this waste (e.g. waste transfer station) is required to make a return to the producer of that waste (i.e. the company) within one month of the end of the quarter in which the waste was received. This is to confirm to the producer (Sentrex Support Services) that the waste has been received. This return can consist of either the form set out in the Hazardous Waste Regulations or a copy of the consignment note with the relevant section completed.

5.4 An **Audit Trail** of waste production, storage and disposal will be completed, as appropriate, to establish regulatory compliance in line with the Duty of Care.

6. Further References

Scottish Environmental Protection Agency
<http://www.sepa.org.uk/guidance/index.htm>

Hazardous Waste Regulations 2005 -
<http://www.opsi.gov.uk/si/si2005/20050894.htm>

List of Wastes (England) Regulations 2005 -
<http://www.opsi.gov.uk/si/si2005/20050895.htm>

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Environment Agency guide to the Hazardous Waste Regulations -
<http://www.environment-agency.gov.uk/common data/103599/hazardous waste guide 1100083.do>

7. Record Forms

None.

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Procedure Title: Water Management		Procedure No: 16
First issued: 13.04.04	Last revised: 21.5.05	Revision No: 03.0
ISO 14001 reference: 4.4.6		
O M reference: None.		
Related procedures: <ul style="list-style-type: none"> • Procedure 19 - Maintenance of Register of Applicable Legislation and Other Requirements • Procedure 11 - Purchasing in-house • Procedure 15 - Waste Management • Procedure 5 - Energy Management • Procedure 4 - Emergency response 		

1. Purpose

1.1 To provide an overview of the responsibilities relating to the provision of water services, maintaining water hygiene, controlling consumption and ensuring appropriate discharge to sewer systems.

2. Scope

2.1 This procedure covers the management of all systems for the storage and distribution of water, the provision of quality water services, and the maintenance of a safe and appropriate wastewater discharge system.

2.2 This procedure covers the environmental issues associated with:

- water storage, distribution and consumption
- water treatment
- wastewater collection
- wastewater discharge

3. Definitions

3.1 Water services - all hot and cold water facilities.

3.2 Legionellosis – or *Legionnaires disease* - a form of pneumonia that may affect organs other than the lungs, resulting from the intake of *Legionellae* organisms (which survive and multiply in water).

3.3 Trade effluent – any effluent discharged from premises used for the purpose of trade or industry, other than surface water and domestic sewage.

3.4 Sewage – any liquid that is or has been in a sewer.

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3.5 Surface water – rainwater run-off from buildings, car parks and land.

3.6 Recording – documenting dated meter readings with identification of the individual taking the reading.

3.7 Monitoring – analysing the meter readings, calculating the consumptions, and identifying and accounting for consumption trends (e.g. increases, decreases, large, gradual, etc.).

3.8 Reviewing – comparing actual consumption against targets and taking appropriate subsequent actions.

4. Responsibilities

4.1 Site Supervisors/Managers have overall responsibility for ensuring that the procedure is followed and for reporting any detected non-conformance.

4.2 Site Supervisors /Managers are responsible for overseeing the supply of water that is fit for purpose, and the discharge of wastewater in compliance with all statutory requirements.

4.3 Site Managers are responsible for monitoring water consumption, keeping records and reporting data to the Managing Director.

4.4 The Managing Director is responsible for consolidating water consumption data from each site into data for the company and for monitoring progress against targets.

4.5 Site Supervisors / Managers are responsible for implementing appropriate remedial actions if targets are not being met.

4.6 The Managing Director is responsible for providing advice and information to Site Managers, as appropriate.

4.7 It is the responsibility of all employees to ensure that they comply with the provisions of this procedure so far as they relate to matters within their control.

5. Procedure 5.1 Water conservation 5.1.1

All employees will take reasonable measures to conserve water.

5.1.2 Plant and equipment shall be selected and maintained for water-efficient operation.

5.1.3 Water conservation measures will be employed to optimise water usage and to reduce wastewater generation, where appropriate. Such measures may include:

- urinal flush controls

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- spray taps
- low volume flush toilets
- sub-metering of water for major end users.

5.1.4 Appropriate notices, posters and stickers will be displayed throughout buildings to remind all users to conserve water.

5.1.5 Detected or suspected leakage or wastage will be reported to the Site Supervisor/ Manager as soon as possible. The Site Manager will investigate all such incidences and document the findings. Prompt remedial actions (i.e. within 24 hours) will be initiated where it has been established that significant water waste is occurring, or is likely to occur. Such examples include, but are not restricted to:

- running taps that cannot be turned off
- leaks or suspected leaks, especially in the mains pipe-work
- meter readings that indicate an inexplicable rise in consumption. 5.2

Wastewater discharge

5.2.1 No wastewater other than that classifiable as domestic sewage and surface water run-off will be discharged to the sewerage or surface water system, respectively.

5.2.2 No prohibited substances will be stored on site or released to the drainage systems (e.g. The Red List Substances – see Appendix 1).

5.2.3 Contact with, or access into the sewerage system should be approached with care as microbiological pathogens may be present on equipment and the pipework system will be contaminated by sewage. Access will be restricted to authorised personnel only. Particular attention is drawn to the risk of Leptospirosis (or Weil's disease) when working in sewers.

5.2.4 The Site Supervisor / Manager shall ensure that prior to any operative working in confined spaces such as sewerage access holes, a permit to work is obtained, and the operative is issued with appropriate personnel protective equipment (PPE), including gas detection equipment.

5.3 Water treatment

5.3.1 An approved Specialist Contractor will monitor on a regular basis the dosage of water systems (e.g. boilers, heating and chilled water systems) with appropriate treatment chemicals (e.g. softeners).

5.3.2 Water systems will be inspected and tested annually in order to ensure water hygiene is maintained at levels suitable to control the risk of legionellosis and other microbiological pathogens. Records of work

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carried out and monitoring test results should be maintained in the site's EMS Manual Volume 3.

5.3.3 Site Supervisors Managers are responsible for ensuring that all water systems at risk of becoming contaminated with legionella have been identified.

5.3.4 Water systems shall be maintained in accordance with the latest Health Service Guidance with respect to the control of legionellosis and also with Guidance from the Health and Safety Executive.

5.3.5 In the event that legionella bacteria are found in any water system the nominated person must be informed and the system immediately isolated, cleaned and chlorinated in accordance with the latest Health Service and/or Health and Safety Executive Guidance.

5.4 Water system alterations

5.4.1 Any alterations to water systems must be carried out in compliance with the statutory requirements.

5.5 Water monitoring

5.5.1 Water consumption based on actual meter readings shall be recorded on a weekly basis, using an appropriate log sheet (see attached example). The date that the reading was taken, the units of measurement, meter factors and calculated weekly consumption will be indicated on the log sheet. The log sheet will be retained in the site's EMS Manual Volume 3.

5.5.2 All log sheets and related records will be retained on-site for a period of five years. All records will be retrievable within five working days.

5.5.3 Site based water consumption data will be reported monthly.

5.5.4 Water consumption will be monitored, at least on a monthly basis, and preferably weekly. Significant changes in consumption trends will be investigated and accounted for.

6. Further References

None.

7. Record Forms

Water Consumption Log sheet

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WATER CONSUMPTION LOGSHEET

Meter N°/Ref (taken from meter):

Units of measurement (taken from meter):

Date of Reading	Meter Reading (include all digits)	Consumption (current – previous)	Running Total (sum consumption)	Signed
Total				

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APPENDIX 1

The UK Red List

Aldrin
 Atrazine
 Azinphos-methyl
 Cadmium and its compounds
 DDT (including metabolites of DDD and DDE)
 1,2-dichlorethane
 Dichlorvos
 Dieldrin
 Endosulfan
 Endrin
 Fenitrothion
 Hexachlorobenzene
 Hexachlorobutadiene
 Gamma-hexachlorocyclohexane
 Malathion
 Mercury and its compounds
 PCB's
 Pentachlorophenol
 Simazine
 Trichlorobenzene (all isomers)
 Trifluralin
 Tributtylin compounds
 Triphenyltin compounds

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Procedure Title: Maintenance of Register of Applicable Legislation and Other Requirements, and Evaluation of Compliance		Procedure No: 19
Date issued: 03.04.04	Last revised: 29.4.05	Revision No: 05.0
ISO 14001 reference: 4.3.2, 4.5.2, 4.4.6		
O M reference: All		
Related procedures: <ul style="list-style-type: none"> ■ Procedure 24 - EMS Audit ■ Procedure 1 - Communications ■ Procedure 13 - Training ■ Procedure 12 - Resource/Consumables Use ■ Procedure 15 - Waste Management ■ Procedure 14 - Transport and Travel ■ Procedure 5 - Energy Management ■ Procedure 16 - Water Management ■ Procedure 2 - Contractor management on-site ■ Procedure 4 - Emergency response ■ Procedure 7 - Environmental complaints ■ Procedure 9 – Site Management ■ Procedure 18 - Environmental Aspects and ■ Procedure 20 - Objectives and Targets 		

1. Purpose

1.1 To identify, maintain and anticipate all legal and other requirements relevant to the environmental aspects of Sentrex Support Service's activities, products and services, and make certain that all such requirements are periodically evaluated to ensure compliance.

2. Scope

2.1 This procedure relates to all the activities, products and services of the company, at each of its locations, that give rise to environmental impacts governed by legal or other requirements.

3. Definitions

3.1 Register of Applicable Legislation and Other Requirements – all relevant legislation and other requirements applicable to the Company's environmental aspects.

3.2 HSE – Health & Safety Executive

3.3 EHOs – Environmental Health Officers

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4. Responsibilities

4.1 The Managing Director is ultimately responsible for ensuring appropriate mechanisms are in place to ensure legal compliance in all activities, products and services.

4.2 The Managing Director, or nominated representative is responsible for establishing and maintaining the Register of Applicable Legislation and Other Requirements (which is only pertinent to *environmental aspects*).

4.3 The Managing Director, or nominated representative, is responsible for evaluating compliance with legal and other requirements.

4.4 It is the responsibility of Site Supervisors /Managers to appraise themselves of the Register of Applicable Legislation and Other Requirements and to ensure day to day compliance.

4.5 All employees have a responsibility to advise the Managing Director of current or future relevant legislation or other guidelines that should be included on the Register.

5. Procedure

5.1 All relevant legislation and other requirements applicable to the Company's environmental aspects will be compiled into a Register of Applicable Legislation and Other Requirements.

5.2 The introduction of new legislation and changes to current legislation will principally be monitored through following sources of information may include:

- relevant publications (e.g. ENDS and other trade press)
- Professional bodies, Institutions, Associations, etc., (CIWEM, IEMA etc.)
- liaison with regulators (Scottish Environmental Protection Agency, HSE, EHOs, etc.)
- www.envirowise.gov.uk
- www.environment-agency.gov.uk
- www.theacorntrust.org
- other networking (e.g. seminars, conferences, workshops, etc.).

5.3 A subscription to at least one professional manual will be maintained on an on-going basis. Regular updates will be inserted into the manuals within one calendar month of receipt.

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5.4 Each update received will be screened for its relevance to the company and a record of the screening retained electronically (see attached example of “review of applicable legislation” form). The Register of Applicable Legislation and Other Requirements will be amended, where necessary, within one calendar month.

5.5 The introduction of new legislation, changes to existing legislation, or new government agendas, charters or policies considered by the Managing Director or nominated representative, to be of particular relevance and importance to the Agency will be cascaded to relevant employees as quickly as practicable. Communication may be in the form of an e-mail, link or article provided on the intranet, dissemination through working groups, or articles in the company newsletter or other internal publications.

5.6 Awareness of and compliance with legislation and other requirements will be evaluated by one or more of the following:

- audits
- document and/or records review
- facility inspections/tours
- staff interviews
- Management Review.

5.7 Compliance will be evaluated during each internal audit, and at the time of the Management Review.

5.8 Records, in the form of audit reports or Management Review documents, detailing the outcome of these compliance evaluations will be retained by the Managing Director.

6. Further References

Croner's Environmental Management

GEE Environmental Compliance Manual

Scottish Environmental Protection Agency Guidance

HSE Guidance

Government Domestic Policy

Envirowise Website

7. Record Forms

EMS – review of new applicable legislation.

EMS – review of new applicable legislation form

Date of ECM update:				
Reviewed by:				
New Legislation : UK	Details	Relevance to Sentrex's significant aspects		Action
		Internal operation	Contractor activity	

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Procedure Title: Setting Objectives and Targets		Procedure No: 20
Date issued: 03.07.04	Last revised: 29.4.05	Revision No: 05.0
ISO 14001 reference: 4.3.3, 4.4.6		
O M reference: None.		
Related procedures: <ul style="list-style-type: none"> ■ Procedure 18 - Environmental Aspects and Impacts ■ Procedure 21 - Management Programme ■ Procedure 1 - Communications ■ Procedure 19 - Maintenance Register Legislation 		

1. Purpose

1.1 To establish, implement and maintain environmental objectives and targets that are consistent with Sentrex Support Service's environmental policy, and whose achievement will demonstrate continual improvement.

2. Scope

2.1 This procedure applies to the Environmental Management System of Sentrex Support Services.

3. Definitions

3.1 Environmental Objective - an overall environmental goal arising from the environmental policy, that an organisation sets itself to achieve, and which is measurable where practicable.

3.2 Environmental Target - detailed performance requirement, applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives. The target should be measurable where practicable.

4. Responsibilities

4.1 The Managing Director, or nominated representative, is responsible for drafting an annual programme of objectives in targets for the whole Company.

4.2 Members of the Management are responsible for agreeing objectives and targets relating to activities under their management control.

4.3 The Managing Director has ultimate responsibility for approving and endorsing objectives and targets for the organisation.

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4.4 Site Supervisors / Managers are responsible for managing the achievement of site based objectives and targets, and reporting on progress to the Managing Director.

4.5 Line Managers are responsible for managing the achievement of objectives and targets relating to their activities, and reporting on progress to the Managing Director.

4.6 All employees are responsible for contributing to the achievement of organisational objectives and targets.

4.7 The Managing Director is responsible for monitoring progress against the environmental targets and objectives and reporting periodically to the ME.

5. Procedure

5.1 The setting of environmental objectives will involve the review and appraisal of:

- legislative and other requirements, e.g. government policy
- the Company's significant environmental aspects and impacts
- the views of interested parties
- the Company's significant aspects and impacts
- technological options
- financial, operational and business requirements.

5.2 Each objective will be linked to one or more targets which detail the actual process of achieving the individual objectives. In the case of long-term objectives, interim targets may be required to monitor progress.

5.3 The objectives and targets provide a detailed account of Sentrex Support Service's commitment to environmental issues as outlined in the environmental policy. These objectives and targets will be used to form the Management Programme which details responsibility and a timescale of achievement for each objective and target.

5.4 Management representatives with direct involvement in the attainment of objectives and targets will be made aware of their responsibilities through the distribution of the Management Programme.

5.5 The objectives and targets will be revised as follows:

- on an annual basis as part of the management review
- on relevant changes to the register of applicable legislation
- when failure to meet targets is highlighted through audits
- as a consequence of documented and reported stakeholder concerns.

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6. Further References

Register of Environmental Aspects and Impacts (EMS document No. 6)

Register of Applicable Legislation and Other Requirements (EMS document No. 7)

Environmental Objectives and Targets and Associated Management Programme
(EMS document No. 4)

Sentrex Support Services	
Environmental Management System	

Procedure Title: Management Programme for Objectives and Targets		Procedure No: 21
Date issued: 03.04.02	Last revised: 3.5.05	Revision No: 05.0
ISO 14001 reference: 4.3.3, 4.4.1, 4.4.6		
O M reference: None.		
Related procedures: <ul style="list-style-type: none"> ■ Procedure 18 – Register Environmental Aspects and Impacts ■ Procedure 20 - Objectives and Targets ■ Procedure 1 - Communications 		

1. Purpose

1.1 Objectives and Targets require a programme detailing how they will be achieved. This procedure assigns responsibilities for the Management Programme.

2. Scope

2.1 This procedure applies to the Environmental Management System of Sentrex Support Services

3. Definitions

3.1 Environmental Objective - an overall environmental goal arising from the environmental policy, that an organisation sets itself to achieve, and which is quantified where practicable

3.2 Environmental Target - detailed performance requirement, applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.

4. Responsibilities

4.1 The Managing Director, or nominated representative, in consultation with working group members and other individuals as appropriate, has responsibility for the development of the Management Programme.

4.2 The Managing Director is responsible for approving the environmental Management Programme.

4.3 The Managing Director has responsibility for updating the environmental Management Programme and ensuring it is made available.

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5. Procedure

5.1 A Management Programme for achieving Sentrex Support Service's objectives and targets will be compiled and will include the following:

5.1.1 designation of responsibility for achieving targets 5.1.2 the

means by which targets will be achieved 5.1.3 timescale for

achievement of targets

5.1.4 provision in respect of new and modified projects.

5.2 A copy of the Management Programme will be sent to the individuals identified as holding the responsibility for achieving targets.

5.3 The Management Programme will be reviewed when:

5.3.1 objectives or targets are reviewed

5.3.2 an extended timeframe is required for successful achievement 5.3.3

legislation or other criteria changes.

5.4 Where practical, the current status of each item on the management programme will be indicated as a result of management reviews and audits.

6. Further References

Objectives and Targets and Associated Management Programme (EMS document No. 4)

7. Record Forms

None.

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Procedure Title: Document Control		Procedure No: 22
First issued: 03.04.02	Last revised: 09.01.06	Revision No: 05.0
ISO 14001 reference: 4.4.5		
O M reference: None		
Related procedures: Procedure 24 - EMS Audit		

1. Purpose

1.1 To establish and maintain a system whereby all issued environmental documents are controlled through a system of authorisation and the use of issue date, revision date and revision numbers.

1.2 To ensure that documents of external original (e.g. correspondence from the external auditor, codes of practice etc.) that are necessary for the planning and operation of Sentrex Support Service's environmental management system are identified and their distribution controlled.

2. Scope

2.1 This procedure applies to all environmental documents, registers, records and procedures used in, or of relevance to, Sentrex Support Service's Environmental Management System.

3. Definitions

3.1 The Environmental Management System Manual (Volume 1) is the compiled documentation that is established and maintained in order to implement an ISO 14001 certified EMS, other than procedures and local site records.

3.2 The Environmental Management System Procedures Manual (Volume 2) comprises, or references, the procedures employed in the operation of the EMS.

3.3 Volume(s) 3 of the EMS comprise local site records, not otherwise contained in Volumes 1 or 2, and central records pertaining to the management of the EMS.

3.4 Issue date is the date the document was first issued as a controlled document.

3.5 Revision date is the date the controlled document was last revised.

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3.6 Revision number indicates the number of times the document has been revised in a given year.

4. Responsibilities

4.1 The Managing Director, or nominated representative, is responsible for the approval of amendments.

4.2 The Managing Director is responsible for checking and approving the format, content and dissemination of environmental management documentation.

4.3 The Managing Director is responsible for maintaining the controlled version of the EMS Manual (Volumes 1 and 2), which is the version on the Company's website:
<http://www.vacman.co.uk/>

4.4 The Managing Director, or nominated representative, is responsible for maintaining a Volume 3 for central records of external origin.

4.5 It is the responsibility of the holder of uncontrolled copies of the EMS Manual (Volumes 1 and 2) to ensure that documentation is updated and maintained at current issue status.

4.6 It is the responsibility of the author of procedures/documents to comply with the format and follow the numbering procedures in the production of any new or amended procedures/documents.

5. Procedure

5.1 Issuing of Manuals

5.1.1 The Managing Director will liaise with the Website Author to ensure that the controlled version of the EMS Manuals on the Company's website is up-to-date at all times.

5.1.2 Uncontrolled hard copies of the EMS Manual (Volumes 1 and 2) may be issued with the authorisation of the Managing Director .

5.2 Amendments

5.2.1 Amendments to the EMS Manual may come from two sources:

(a) Sentrex employees

Employees may send, in memorandum format, details to the Environmental Manager, or nominated representative, of the documentation to be updated and amended. The memorandum must contain the section number, title and issue no. A reason for the change and details of the change will be specified, and the memorandum must be signed as authorised by the employee's Line Manager. The memorandum will be retained and filed by the Managing Director or nominated representative.

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(b) Managing Director

The Managing Director may initiate amendments to EMS documentation in response to:

- external audit nonconformity's or observations of the certification body;
- nonconformity's or observations arising from internal auditing process;
- changes to the requirements of the ISO14001 EMS standard;
- as a consequence of the management review process;
- other internal and external changes (e.g. restructure of the organisation, changes in legislation).

5.2.2 The Managing Director will document changes to the EMS Manuals through completion of an Amendment Control Form. The Amendment Control Form will indicate the reason for the amendment and the action to be taken to update the EMS Manual.

5.2.3 The Amendment Control Form will be retained and filed by the Managing Director.

5.2.4 The Managing Director will ensure that the amended version of the controlled document is put on the Company's website.

5.3 Format of Manuals

5.3.1 Each volume (manual) will contain the following:

- Index (contents) page.

5.3.2 Where practical, each document contained in the manuals will be headed with:

"Sentrex Support Services
Environmental Management System"

5.3.3 Where practical, each document contained in the manuals will be footed with:

- Rev. Date
- Rev No. 'j.k', where j = two digit year (e.g. 02 for 2002) and k = revision number in that year
- Procedure/Document/Record No.
- EMS Volume 'z', where z = volume number

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■ Page 'x' of 'y', where x = page number and y = total number of pages

5.3.4 The first page of each document in the EMS Manual will contain the following information:

- title
- number
- first issue date
- last revision date
- revision number
- ISO 14001 reference
- OM (Operations Manual) reference (if relevant)
- related procedures/documents

5.3.5 Each document in the EMS Manual (Volume 1) will include the following sections:

- introduction
- scope
- details
- review.

5.3.6 Each procedure in the EMS Manual (Volume 2) will contain the following sections of information, where relevant:

- purpose of the procedure
- scope - the aspects covered by the procedure
- definitions
- responsibilities
- procedures
- further references - for example to health and safety procedures, working practice documentation etc.
- record forms - any record forms which are attached to the procedure

5.4 Documents of external origin

5.4.1 Documents of external origin that are relevant to the operation of the Company's EMS will be filed in Volume 3 (central records).

5.4.2 Each document will given a unique reference number (XY) where:

- X = letter of the alphabet which helps to identify the document, e.g. "W" for waste code of practice, "O" for oil storage etc.
- Y = sequential number, commencing with 1.

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5.4.3 The document will then be filed alphabetically by the letter that has been allocated, and then by sequential number.

5.5 Review and Records

5.5.1 The Managing Director, or nominated representative, will review all environmental documentation for content, accuracy and relevance to Sentrex Support Services, as part of the management review process, and at other times as appropriate.

5.5.2 The Managing Director will retain records of each review.

6. Further References

None.

7. Record Forms

Example Amendment Control Form

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Amendment Control Record

Date	Procedure/ Document Number	Procedure/Document Title	Reason for Amendment	Details of Amendment and Action Required	Revision Number	Authorised by

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Procedure Title: Non-conformance and corrective action		Procedure No: 23
Date issued: 03.04.04	Last revised: 29.4.05	Revision No: 05.0
ISO 14001 reference: 4.4.6, 4.5.2		
OM reference: 2-01		
Related procedures: All		

1. Purpose

1.1 This procedure sets out the requirements for dealing with actual and potential nonconformity (ies) and for taking corrective action and preventive action.

2. Scope

2.1 This procedure is concerned with nonconformity (ies) identified **outside the internal EMS Audit process**.

2.2 This procedure covers both non-conformance with the Company's EMS procedures as well as non-conformance with the ISO 14001 specification.

2.3 Reports of non-conformances may result from external audits or may occur as part of routine operations, where an individual or department may identify a non-conformance.

3. Definitions

3.1 Nonconformity – non-fulfillment of a requirement, whether this is one of the Company's EMS procedures, or the ISO 14001 standard.

3.2 Corrective Action - action taken to eliminate the cause of a detected non-conformance.

3.3 Preventive Action - action taken to eliminate the cause of a potential nonconformity or avoid repetition of the same non-conformance.

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4. Responsibilities

4.1 It is the responsibility of the Managing Director , or nominated representative, to prepare and issue a non-conformance report (NCR) on detection of a non-conformance including, where appropriate, as a consequence of an environmental complaint.

4.2 It is the responsibility of all employees to bring suspected non-conformances to the attention of the Managing Director, or nominated representative.

4.3 Site Managers/Supervisors and Line Managers will comply with all corrective and preventive actions prescribed. In exceptional cases, they should inform the Managing Director , or nominated representative, of reasons why actions cannot or will not be taken, for further consideration and decision.

4.4 The Managing Director will establish and maintain a reporting and record keeping system for non-conformances, corrective and preventive actions.

4.5 Non-conformances, corrective and preventive actions will be reviewed through the Management Review process.

5. Procedure

5.1 By whichever means a non-conformance is identified, the underlying cause(s) of the non-conformance must be investigated.

5.2 Appropriate and timely corrective action must be taken according to the nature of the non-conformance.

5.3 Preventive action, such as implementing modifying or enforcing procedures or controls, will be taken to avoid repetition of the non-conformance, or prevent a potential nonconformity from occurring.

5.4 Any corrective or preventive action taken to address the causes of an actual or potential non-conformance must be appropriate to the magnitude of problems and commensurate with the environmental impact encountered.

5.5 The company will implement and maintain a system of reporting and record keeping for non-conformances, corrective and preventive action.

5.6 Any changes to the environmental management procedures as a result of corrective or preventive action will be recorded.

5.7 The non-conformance report form (see example attached) will detail the nature and scale of the non-conformance, propose corrective and preventive actions, as appropriate, include references to procedure number, date and include timescales, where relevant.

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5.8 Repeated non-conformances of the same nature or significant deviations from procedures (for example, disregard of the procedures, or total absence of required documentation) will be reported to the Managing Director for action and resolution.

5.9 Significant deviations from the environmental policy will be reported to the Managing Director at the next available meeting.

5.10 A report will be submitted to the Managing Director on a regular basis, reviewing all non-conformances and their respective corrective and preventative actions. The report will include the following:

- review of non-conformance reports
- review of corrective actions
- review of preventive actions
- review of environmental complaints
- review of internal EMS audits
- review of external EMS audits.

5.11 Where preventive actions involve long term programming, these will be considered in the setting of objectives or targets.

6. Further References

None.

7. Record Forms

Non-conformance report form.

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Non-conformance		report (NCR) form		
<i>To be completed by person identifying or suspecting a non-conformance:</i>				
Name:		Signature:		
Location of NCR:			Date:	
Details of (suspected) non-conformance:				
<i>To be completed by Managing Director,</i>		appointed	deputy:	
Category of non-conformance:	1	2	3	N/A
Recommendations or verdict:				
Responsible party:		Deadline for completion:		
<i>To be completed by responsible party:</i>				
Action taken:				
Signature:			Date:	
Verified by :			Date:	
NCR Standards: <ol style="list-style-type: none"> 1. Major non-conformance with legislation/ Sentrex Policy 2. Significant number of minor non-conformances with a standard/policy 3. Minor problem areas which warrant attention 				

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Procedure Title: EMS Audit		Procedure No: 24
First issued: 03.04.04	Last revised: 08.01.06	Revision No: 06.0
ISO 14001 reference: 4.5.5		
O M reference: 2-01		
Related procedures: <ul style="list-style-type: none"> ③ Procedure 19 - Maintenance of Register of Applicable Legislation and Other Requirements ③ Procedure 22 - Document Control ③ Procedure 13 - Training ③ Procedure 11 - Purchasing in-house ③ Procedure 4 - Emergency response ③ Procedure 7 - Environmental complaints ③ Procedure 23 - Non-conformance and corrective action 		

1. Purpose

1.1 To determine whether the Sentrex Support Service's Environmental Management System (EMS) conforms to planned arrangements for environmental management, including the requirements of the international standard ISO 14001.

1.2 To determine whether the environmental management system has been properly implemented and maintained.

1.3 To provide information on the results of audits to management.

2. Scope

2.1 All elements of Sentrex Support Service's Environmental Management System.

3. Definitions

3.1 Audit – a systematic and documented verification process of objectively obtaining and evaluating evidence

3.2 Internal Audit (First Party Audit) – an audit carried out by the company on its own performance

3.3 *External audit (third party audit) – an audit conducted by a third party in accordance with the requirements of ISO 14001, to attain/ maintain certification.*

3.4 Element – a particular aspect of the Environmental Management System e.g. record keeping.

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3.5 Environmental auditor – persons who have completed the auditor training for ISO14001 and can display competency and objectivity in the tasks and duties of an environmental audit.

3.6 Non-conformance Report (NCR) - a report issued by an auditor when the objective evidence of an auditor reveals that activities are either not in compliance with the relevant components of the EMS, the EMS is not being implemented effectively, or, the EMS as implemented does not comply with the requirements of the standard. NCRs are categorised into three distinct categories:-

3.6.1 Category 1 - a major non-conformance with the requirements of the standard and therefore requiring urgent/immediate remedial action

3.6.2 Category 2 - a significant number of minor non-conformances with the requirements of the standard and where remedial action is required.

3.6.3 Category 3 - minor problems areas, attention is warranted.

3.7 Observation: -

3.7.1 An issue that requires attention in order to improve the operation of the environmental management system and that if left un-addressed is likely to lead to a non-conformance during future audits; or

3.7.2 An example of good environmental practice that deserves recognition 3.7.3 A

flag for re-revisit at next audit.

4. Responsibilities

4.1 It is the responsibility of the Managing Director Environmental Manager to ensure that Sentrex Support Service's Environmental Management System is audited in accordance with the requirements of ISO 14001.

4.2 It is the responsibility of the Managing Director to audit each site in accordance with the Audit Schedule.

4.3 It is the responsibility of the Managing Director to ensure that an accredited External auditor has been appointed under contract and to ensure that external audits are conducted at a frequency appropriate to the maintenance of ISO 14001 certification.

4.4 It is the responsibility of the Managing Director to audit those parts of the system that are managed by Line Managers, in accordance with the Audit Schedule.

4.5 The Managing Director is responsible for reporting quarterly to the board of Directors on the results of any audits undertaken during the period.

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4.6 It is the responsibility of all employees to co-operate with audit procedures and auditors.

4.7 It is the responsibility of the Managing Director to maintain a list of trained auditors and to ensure that a sufficient number of auditors have been trained.

4.8 It is the responsibility of Site Supervisors /Line Managers to ensure that any non-conformances identified by an environmental audit are addressed.

5. Procedure

5.1 An audit schedule will be established by the Managing Director to ensure that all areas of the Company's Environmental Management System are audited.

5.2 For internal audits, the intervals between auditing a particular site or element will vary between one year and three years dependent on the significance of the environmental aspect associated with that site or element.

5.3 Internal Auditors will not audit their own areas of responsibility.

5.4 Environmental Auditors will receive appropriate, documented training so they are equipped with the skills necessary to conduct an audit in a competent manner.

5.5 An internal environmental audit will be undertaken in the following manner:

5.5.1 The Managing Director, or nominated deputy will identify the area/element that requires auditing

5.5.2 At least two weeks before the planned audit a nominee from the list of trained auditors will be assigned to the audit and the relevant area/departamental manager ('responsible party') informed of the intention to undertake an audit.

5.5.3 The nominated auditor will be responsible for planning, preparing and undertaking the audit in accordance with his/her training and the requirements of this procedure.

5.5.4 During the planning stage the results of previous audits will be used to determine the audit scope, where applicable.

5.5.5 The appointed auditor will liaise with the appropriate manager to agree a date for the audit.

5.5.6 At the beginning of the audit the auditor will convene a brief meeting with the appropriate manager to outline the scope of the audit.

5.5.7 The audit will be undertaken through completion of the template document (Appendix 1) and by recording details of the objective evidence gathered.

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5.5.8 The auditor will meet with the appropriate manager at the end of the audit to relay findings, to give an opportunity for factual errors to be corrected, to agree corrective actions and to sign-off the audit.

5.5.9 The auditor will submit a written report to the manager of the area/department and to the Managing Director, or nominated deputy, within two weeks of the audit, as detailed below.

5.6 Internal Audit Reports

5.6.1 The results of the audit will be summarised in an Audit Summary Report (see Appendix 3). The Managing Director will maintain a sequential record of all audits undertaken in year order.

5.6.2 A satisfactory audit indicates objective evidence has been obtained to demonstrate that the EMS has been implemented as planned and is effectively maintained, and that it conforms to the requirements of the standard. Satisfactory audit reports will be:

- a) signed off as completed by the auditor
- b) filed in the audit master file for the appropriate year in sequential number order.

5.6.3 An unsatisfactory audit indicates that objective evidence has been recorded by the auditor to the effect that there is a single or series of non-conformances. In all such instances the auditor will:

- a) issue one or more non-conformance report(s) (see Appendix 2) to the responsible party against the relevant clause of the ISO14001 standard.
- b) record the issue of a non-conformance report on the Audit Summary Report.

5.7 Non-Conformance Reports for internal audits

5.7.1 A non-conformance report (NCR) is issued by the auditor to the responsible party for a certain element of the EMS, when the objective evidence of an auditor reveals that the activities are either not in compliance with the relevant components of the EMS, the EMS is not being implemented effectively, or the EMS as implemented does not comply with the requirements of the standard.

5.7.2 An NCR will be identified as category 1, 2 or 3, according to the aforementioned definitions.

5.7.3 An NCR will be completed by the auditor for each identified noncompliance, unless otherwise associated by a 'root cause'. Reports will identify the year/sequential number of the audit, the nonconformance number, details of the non-conformance, and the auditors recommendations. If necessary, objective evidence should be attached/filed with the non-conformance report.

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5.7.4 Remedial action and the date for completion will be agreed between the auditor and the responsible party and details entered on the report.

5.7.5 The auditor and the responsible party will sign the report to confirm agreement.

5.7.6 When remedial action has been completed and objective evidence is available to indicated as such, the NCR will be signed by both the responsible party and the auditor to confirm that action has been completed

5.7.7 Audit Summary Reports and associated NCRs where applicable should be kept in the master audit file, in sequential order, for a period of three consecutive years.

5.7.8 Outstanding NCRs should be reviewed during each audit to determine progress towards implementing corrective actions.

5.8 External Audits will be arranged on a bi-annual basis with the appointed external auditors. Each site will be externally audited at least once during a three-year period.

5.9 The findings of the audit process will be reported to the ME on a quarterly basis.

6. Further References

ISO14010 Guidelines for environmental auditing - General principles

ISO14011 Guidelines for environmental auditing – Audit procedures – Auditing of environmental management systems.

ISO14012 Guidelines for environmental auditing – Qualification criteria for environmental auditors.

7. Record Forms

Appendix 1 – EMS Audit Template

Appendix 2 – Audit Summary Report

Appendix 3 – Non-Conformance Report

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Appendix 1 – Internal Audit Template

Sentrex Support Services EMS Audit

Audit number: (prefixed by year, e.g. '99-01')	Site:	Date:	Sheet No.:
Auditor name:	Interviewee name:	Job title:	

ISO 14001 Clause:	Document/ Procedure no.	Document/ Procedure title:
Looking at (samples):	Looking for:	Comments

Auditor signature:

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Appendix 2 – Non-Conformance Report for internal audits

Sentrex Support Services EMS Audit Non-conformance report

NCR No:	Audit No:	Sheet No:	Date:		
Site:		Contact:			
Auditor/s:		Category of NCR:	1	2	3
Details of non-conformance:					
Auditor's signature:					
Recommendations					
Agreed by:			Target completion date:		
Signature:					
Action taken:					
Signature of responsible party:			Signature of auditor:		
NON-CONFORMANCE STANDARDS					
1. Major Non-conformance with a standard 2. Significant number of minor non-conformances with a standard 3. Minor problem areas which warrant attention					

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Appendix 3 – Internal Audit Summary Report

Sentrex Support Services EMS Audit Summary Report

Audit No:	Date:	Site:
Department audited		
Scope of audit		
Auditor/s		
Summary		
Non-conformance reference numbers:		
Report prepared by:		Date:
Report approved by:		Date:
(Environmental Supply Policy Manager)		
Distribution:		

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Appendix 3 – Internal Audit Summary Report (cont'd)

Sentrex Support Services	Energy	Transport	Waste	Water	Staff Awareness	Incidents	Complaints	Purchasing	Policy	Totals
Policy (4.2)										
Environmental aspects (4.3.1)										
Legislation (4.3.2)										
Objectives and targets (4.3.3)										
Management programme (4.3.4)										
Structure and responsibility (4.4.1)										
Training awareness and competence (4.4.2)										
Communication (4.4.3)										
Documentation (4.4.4)										
Document control (4.4.5)										
Operational control (4.4.6)										
Emergency preparedness and response (4.4.7)										
Monitoring and measuring (4.5.1)										
Non-conformance (4.5.2)										
Records (4.5.3)										
EMS Audit (4.5.4)										
Management review (4.6)										
Totals										

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Procedure Title: Management Review		Procedure No: 25
Date issued: 25.05.02	Last revised: 29.4.05	Revision No: 05.0
ISO 14001 reference: 4.6		
O M reference: None		
Related procedures: <ul style="list-style-type: none"> <input type="checkbox"/> Procedure 1 - Communications <input type="checkbox"/> Procedure 7 - Environmental Complaints <input type="checkbox"/> Procedure 20 - Maintenance of Objectives and Targets <input type="checkbox"/> Procedure 21 - Environmental Management Programme <input type="checkbox"/> Procedure 24 - EMS Audits 		

1. Purpose

1.1 To deliver a consistent and systematic review of Sentrex Support Service's environmental management system, to ensure its continuing suitability, adequacy and effectiveness as determined by the requirements of ISO 14001.

2. Scope

2.1 A planned review, by management, of the environmental management system in operation at all sites under which the company has management control, in accordance with the requirements of ISO 14001.

3. Definitions

3.1 Environmental management system – the part of the company's overall management system used to develop and implement its environmental policy and managed its environmental aspects.

3.2 Environmental management system audit – a systematic and documented verification process of objectively obtaining and evaluating evidence to determine whether an organisation's environmental management system conforms to the environmental system audit criteria set by the organisation, and for communication of the results of this process to management.

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4. Responsibilities

4.1 The Managing Director, or nominee, will chair management review meetings.

4.2 The review team will consist of the Managing Director, Office Manager, Area Supervisor/Manager (R&C), Area Supervisor/ Manager (East), Area Supervisor (Lochaber), Chairs/members of working groups (by invitation).

4.3 The Managing Director is responsible for preparing the agenda and co-ordinating the provision of information necessary to complete the review.

4.4 Attendees at the review meeting are responsible for ensuring that the recommendations of the review are implemented as appropriate.

5. Procedure

5.1 A formal management review of the Company's environmental management system, as required by ISO14001 will be undertaken at least once annually to evaluate its continuing suitability, adequacy and effectiveness.

5.2 The following headings will form the basis of the agenda:

5.2.1 Apologies for absence

5.2.2 Minutes of previous meeting

5.2.3 Matters arising

5.2.4 Review of the EMS:

- results of internal audits and evaluations of compliance with legal and other requirements
- communications from external interested parties, including complaints
- environmental policy
- environmental performance
- the extent to which objectives and targets have been met
- status of corrective and preventive actions
- follow-up actions from previous management reviews
- changing circumstances, including developments in legal and other requirements related to the Company's environmental aspects
- recommendations for improvement.

5.2.5 Actions

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5.3 Further References

Environmental Policy (Document 2)

Structure and Responsibility (Document 3)

Environmental Objectives and Targets and Associated Management Programme (Document 4)

Register of Environmental Aspects and Impacts (Document 6)

Register of Applicable Legislation and Other Requirements (Document 7)

Training Strategy (Document 8)

EMS Internal Audit Schedule (Document 9)

6. Record Forms

None.

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Procedure Title: Contractor Management on-site.		Procedure No: 2
Date issued: 03.04.04	Last revised: 13.6.05	Revision No: 05.0
ISO 14001 reference: 4.4.6		
O M reference: None.		
Related procedures: <ul style="list-style-type: none"> ■ Procedure 19 - Legislation Register Maintenance ■ Procedure 1 - Communications ■ Procedure 11 - Purchasing in-house ■ Procedure 12 - Resources/Consumables ■ Procedure 4 - Emergency response ■ Procedure 9 – Site Management 		

1. Purpose

1.1 To define the methods by which contractors will be managed on-site.

2. Scope

2.1 This procedure covers the management of all contractors engaged by Sentrex Support Services while engaged in work on company /client sites.

3. Definitions

3.1 CDM compliance - the control of all work to meet the requirements of The Construction (*Design and Management*) Regulations 1994.

3.2 Duty of care - the requirement to exercise reasonable skill, care and diligence in the discharge of duties.

4. Responsibilities

4.1 Site/Contract Managers are responsible for ensuring that contractors are fully informed of the company's environmental policy and environmental management system and that their compliance is monitored.

4.2 It is the responsibility of all persons to ensure that they comply with the provisions of this procedure in so far as they relate to matters within their control.

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5. Procedure

5.1 The Site/Contract Manager shall ensure that all staff they employ in any work for the Company have sufficient knowledge and experience for the work being carried out and are capable of performing their duties in a manner compatible with the Company's environmental policy.

5.2 All contractors shall demonstrate that they have suitable management systems to control their site work and associated activities in accordance with Sentrex's environmental policy and management system.

5.3 The Site/Contract manager shall ensure that all works undertaken conform to the requirements of Sentrex's environmental management system, particularly where this relates to noise, dust, the use of hazardous substances, and the management of waste material. As appropriate, contractor activities should be supervised and monitored.

5.4 CDM compliance

5.4.1 In addition to site health and safety procedures relevant works will also be subject to the control and procedures of the Construction (*Design and Management*) Regulations 1994.

5.4.2 Health and Safety plans shall be developed to the satisfaction of the Site Manager.

5.4.3 The Contractor shall supply all relevant information for our Health and Safety Files for approval by the Managing Director before final completion.

5.5 Duty of care

5.5.1 All contractors shall be required to exercise reasonable skill, care and diligence in carrying out their work to minimise environmental impact.

5.5.2 All contractors shall be required to notify the client of any occurrences, hazards or risks of which they become aware, even if they do not relate directly to their own work, including evidence of significant leakage of water and discharges of harmful substances that could cause environmental damage.

5.5.3 No contractor will carry out any work that will expose any person to hazardous substances until a satisfactory assessment of the risk has been undertaken and suitable precautions put in place. Contractors must notify the site manager of any work involving substances covered by the COSHH Regulations for agreement prior to starting. Contractors are responsible for ensuring that appropriate COSHH risk assessments have been completed prior to substance use on any Sentrex site.

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5.6 Contractor induction

5.6.1 All contractors working on-site will be made aware of the following prior to the commencement of work:

- a) Sentrex's environmental policy and the need to prevent pollution; conserve resources, energy and water; and the need to minimise waste
- b) who to contact in the event of a query about operation of the environmental management system
- c) what action to take in the event of a spillage, environmental incident or other situation requiring an emergency response.

5.6.2 Local arrangements for ensuring compliance with this procedure will be documented and may include the use of 'permits to work'.

5.6.3 Documented records will be kept to demonstrate compliance with Paragraph 5.6.1. A sample is attached as Annex A.

5.6.4 Where a contractor operates under its own environmental policy, a copy of its policy will be retained on file by the site/contract manager.

6. Further References

- a) HSE Guidance Notes.
- b) Sentrex Support Services Health & Safety Notice HSN-14

7. Record Forms

Annex A – Sample contractor briefing record

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Annex A – Sample Contractor Briefing Record

Sentrex Support Services has implemented an environmental management system, which is designed to meet the requirements of the international standard ISO 14001. As a contractor working on site, this means you need to:

- support our environmental policy
- help us to achieve our environmental objectives and targets by conserving resources, energy and water and by minimising waste whilst on-site
- prevent pollution wherever possible
- follow any procedures in the environmental management system that are relevant to your activities in accordance with the Site Manager's instructions, for example, reporting or responding to an environmental incident
- support our Travel Plan (which aims to reduce the impacts of our travel activities) by minimising your journey's to and from our sites and by using environmentally preferable fuels, for example, low-sulphur
- on our sites, only use timber and timber products that have independent documentary evidence to prove that they have been sourced from sustainable and legal sources
- phase out the use of ozone depleting substances on our sites
- help us to comply with legislative requirements at all times.

We would also welcome any advice you can offer on how we could improve our environmental performance, for example, energy efficiency advice.

I have read the above briefing and agree to support the Sentrex Support Service's environmental management system, where relevant, whilst working on-site.			
Name:			
Signature:		Date:	
Company Name:			
Nature of work:			

Does the company operate under its own environmental policy?	Yes No
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Procedure Title: Emergency Response		Procedure No: 4
Date issued: 03.04.04	Last revised: 13.6.05	Revision No: 05.0
ISO 14001 reference: 4.4.6, 4.4.7		
O M reference: None.		
Related procedures: <ul style="list-style-type: none"> ■ Procedure 19 - Legislation Register Maintenance ■ Procedure 24 - EMS Audit ■ Procedure 1 - Communications ■ Procedure 13 - Training ■ Procedure 15 - Waste Management ■ Procedure 16 - Water Management ■ Procedure 2 - Contractor management on-site ■ Procedure 7 - Environmental Complaints 		

1. Purpose

1.1 To set out roles and responsibilities in connection with implementation of the Company's response to an environmental incident.

1.2 To provide guidance on actions to be taken in response to an environmental incident.

2. Scope

2.1 All activities of Sentrex Support Services conducted at its office locations and work sites.

3. Definitions

3.1 Harmful substance – a substance either prohibited from being emitted / discharged to a receiving medium (atmosphere, ground or water) or a substance released in sufficient quantities to cause environmental pollution or damage.

3.2 Environmental incident – the release, either accidental or malicious, of a harmful substance, for example:

- chemical or oil spillage
- accidental release of a harmful chemical to atmosphere
- accidental release of a harmful substance to the sewerage system
- accidental release of a harmful substance to a local watercourse.

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3.3 Major incident – an incident requiring the involvement of a regulatory authority due to the volume or toxicity of the harmful substance released.

3.4 Minor incident – an incident not requiring the involvement of a regulatory authority.

4. Responsibilities

4.1 It is the ultimate responsibility of the Managing Director to ensure sufficient and appropriate measures are adopted and employed throughout the organisation to prevent the occurrence, and/or mitigate the effects, of environmental incidents.

4.2 Site Supervisors, their line managers or nominated representatives, are responsible for coordinating the response to an environmental incident.

4.3 It is the responsibility of all persons to ensure that they comply with the provisions of this procedure so far as they relate to matters within their control.

4.4 It is the responsibility of the Site Supervisors to ensure that their nominated representatives who may be called upon to respond to an environmental incident have had appropriate training and instruction.

4.5 It is the responsibility of Site Supervisors to ensure that any necessary spill kits are available on site.

5. Procedure

5.1 A suspected or detected environmental incident will be immediately reported to the Site Supervisor/Manager or nominated representative.

5.2 The Site Supervisor/Manager, or nominated representative, will take all reasonable measures to ensure that any release is contained within the site boundary and that harm to human health and the environment is minimised, both within and beyond the site boundary.

5.3 In the event of an incident occurring, the Site Supervisors/Manager, or nominated representative, will take all reasonable measures to ensure that any environmental damage is appropriately remedied.

5.4 Wherever spill kits or other materials have become contaminated due to their use in an environmental incident, they will be disposed of in accordance with relevant waste regulations.

5.5 The Site Supervisor/Manager, or nominated representative, will, with appropriate advice where necessary, determine whether the incident is 'major' or 'minor'. All incidents requiring action beyond site boundaries will be classified as 'major'.

5.6 All 'major' incidents will be immediately reported to the Managing Director.

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5.7 All major incidents will be reported to the relevant regulatory authority in compliance with the appropriate procedure, as soon as is reasonably practicable.

5.8 All contractors working on Sentrex sites will be made aware of the contents of this procedure and be required to comply with its provisions (see procedure No. 2).

5.9 Following an environmental incident an Environmental Complaint/Incident Log Sheet will be completed by the Site Supervisor/ Manager, or nominated representative, and returned to the Managing Director, within one working day.

5.10 The Managing Director will ensure an Environmental Complaint/Incident Action Form is completed within 28 days.

6. Further References

None.

7. Record Forms

Environmental Complaints/Incident Log Sheet (see Procedure No. 7).

Environmental Complaint/Incident Action Form (see Procedure No.7).

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Procedure Title: Energy Management		Procedure No: 5
First issued: 03.04.00	Last revised: 23.10.05	Revision No: 07.0
ISO 14001 reference: 4.4.6		
O M reference: None.		
Related procedures: <ul style="list-style-type: none"> • Procedure 19 – Maintenance Register Legislation and other Requirements • Procedure 11 - Purchasing in-house • Procedure 15 - Waste Management • Procedure 14 - Transport and Travel • Procedure 16 - Water Management 		

1. Purpose

1.1 To provide an overview of the responsibilities relating to the provision and use of energy services and the management of energy consumption.

2. Scope

2.1 Energy consumed at all premises where Sentrex Support Services is the main occupant. It does NOT incorporate energy consumed during travel or transport.

2.2 All activities aimed at ensuring the efficient supply, delivery and end-use of energy services.

3. Definitions

3.1 Energy Services - fossil fuels and electricity used on sites, the systems and equipment by which they are delivered and the associated end uses.

3.2 Essential equipment – equipment that is required to be left permanently switched on for reasons of security, health and safety or communications.

3.3 Recording – documenting dated meter readings with identification of the individual taking the reading.

3.4 Monitoring – analysing the meter readings, calculating the consumptions, and identifying and accounting for consumption trends (e.g. increases, decreases, large, gradual, etc.).

3.5 Reviewing – comparing actual consumption against targets and taking appropriate subsequent actions.

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4. Responsibilities

4.1 Site Supervisor/Manager responsibilities:

- 4.1.1 Facilitating compliance with the general requirements of the procedure.
 - 4.1.2 Pursuing the achievement of agreed consumption targets.
 - 4.1.3 Ensuring site management contracts adequately reflect the requirements of this procedure.
 - 4.1.4 Establishing, maintaining and disseminating a register of essential equipment.
 - 4.1.5 Arranging periodic walk-through surveys and documenting the findings. Assessing the need for any remedial actions and reporting any actions taken to Managing Director.
 - 4.1.6 Arranging the distribution and display of awareness material.
 - 4.1.7 Ensuring timers and automatic controllers are functioning and maintained accordingly and that the agreed settings are documented within the EMS records.
 - 4.1.8 Ensuring meter readings are taken and recorded.
 - 4.1.9 Reporting Quarterly energy consumption to the Managing Director.
 - 4.1.10 Monitoring energy consumption and accounting for consumption trends and for their reporting to the Managing Director.
 - 4.1.11 Identifying and implementing appropriate corrective and remedial actions if targets are not being met.
- 4.2 The Managing Director is responsible of reviewing actual consumption data against targets, and for reporting progress on a quarterly basis.
- 4.3 The Managing Director is responsible for obtaining awareness material and for providing advice to Site Supervisors/ Managers as necessary.
- 4.4 The Managing Director is responsible for consolidating site based energy data into data for the Company as a whole.
- 4.5 All employees are responsible for implementing “good housekeeping” measures and for reporting incidences of waste.
- 4.6 It is the responsibility of all employees to comply with the provisions of this procedure so far as they relate to matters within their control.

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5. Procedure

5.1 Energy Conservation

5.1.1 All employees will take reasonable measures to conserve energy.

5.1.2 Energy efficiency measures shall be employed to minimise energy consumption and emissions to atmosphere, where appropriate. Such measures will include:

- automatic controls of heating, lighting, air conditioning and other equipment where practical
- good housekeeping measures such as switching off unnecessary lights, PCs and other office equipment, wherever practical and possible.

5.1.3 All plant and equipment (including domestic appliances in staff kitchens and common rooms, and IT equipment) shall be selected (in accordance with the procedure on “Green” purchasing) and maintained for energy efficient operation.

5.1.4 Full use shall be made of energy-saving modes of operation.

5.1.5 Appropriate notices, posters and stickers will be displayed throughout buildings to remind all users to conserve energy.

5.2 Essential equipment

5.2.1 A register of essential equipment will be established and maintained by and disseminated for information, as appropriate. The register will be reviewed and updated as appropriate at least annually.

5.2.2 All non-essential equipment will be switched-off at or by the end of the working day.

5.3 Energy management

5.3.1 Walk-through surveys will be conducted at least quarterly, to review site energy management practices and procedural compliance. The survey will include :

- the correct operation and settings of timers and automatic controllers
- lights are turned off in unoccupied rooms
- PCs (including monitors) not being used have been switched off.

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5.3.2 The findings of the survey shall be documented in all cases and retained for inspection. The need for remedial actions shall be assessed and reported, within one week, as necessary.

5.3.3 Incidences or identified practices that cause energy wastage will be reported to the Site Supervisor/ Manager as soon as possible.

5.3.4 Full energy audits shall be conducted every three to five years at each main site to identify, quantify and prioritise opportunities for improving energy efficiency.

5.3.5 Heating, ventilation and air conditioning systems shall be controlled, preferably automatically, to maintain comfortable working conditions, while complying with legislative requirements and energy efficiency good practice.

5.3.6 Settings for all automatic timers will be maintained and documented. The settings should be reviewed on a regular basis, at least biannually, and any changes recorded.

5.4 Monitoring

5.4.1 Energy consumption based on actual meter readings will be recorded on a monthly basis, using an appropriate log sheet (see example attached). The date that the reading was taken, the units of measurement, meter factors and calculated weekly consumption will be indicated on the log sheet. The log sheet will be retained in the site's EMS Manual Volume 3.

5.4.2 All log sheets and related records should be retained on-site for a period of five years. All records should be retrievable within five working days.

5.4.3 Site-based energy consumption data will be reported on a monthly basis, as part of the monthly EMS site report.

5.4.4 Site based energy consumption will be monitored at least monthly, and preferably weekly, for deviations from the target and for sudden changes. Any significant changes in consumption or deviation from the target will be investigated, accounted for and reported. (e.g. boiler shutdown, air-conditioning system malfunction) Remedial actions will be implemented as appropriate.

5.4.5 Quarterly reports on progress against energy targets will be submitted to the Managing Director.

6. Further References

Action Energy - <http://www.thecarbontrust.co.uk/energy/pages/home.asp>

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7. Record Forms

Energy consumption log sheet.

Sentrex Support Services	
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SAMPLE ENERGY CONSUMPTION LOGSHEET – COMPLETE ALL COLUMNS

Meter N°./Ref (taken from meter)	Date of reading	Meter reading (include all digits on meter)	Units of measurement (taken from meter)	Consumption (current – previous reading)	Signed
ELECTRICITY					
OIL					
OTHER (detail)					

Procedure: Environmental Appraisal	Date issued: 10.04.04
Procedure No: 6	Last revised: 16.11.04
ISO 14001 Reference:	Revision No: 03.0

Annex A - Environmental impacts in the Company

Objectives (of policy, decision, business case etc.)			Environmental impacts in the Company						
Ultimate (overall aim)	Intermediate (milestones)	Immediate (actions)	Energy consumption	Resource consumption	Water consumption	Transport and travel	Waste production	Working environment	Hazardous Substance
Date of appraisal:		Total number of benefits Total number of costs							

Author:

Received by:

Enter "C" for a cost/negative impact. Enter "B" for a benefit/positive impact.

Enter "NA" for not applicable.

Full appraisal needed?

Yes

No

Sentrex Support Services	
Environmental Management System	

Procedure Title: Environmental Complaints		Procedure No: 7
Date issued: 03.04.00	Last revised: 17.08.05	Revision No: 05.0
ISO 14001 reference: 4.4.3. 4.4.6		
O M reference: None.		
Related procedures: <ul style="list-style-type: none"> ■ Procedure 19 – Maintenance Register Legislation and Other Requirements ■ Procedure 24 – EMS audit ■ Procedure 1 - Communications ■ Procedure 13 - Training ■ Procedure 15 - Waste Management ■ Procedure 14 - Transport and Travel ■ Procedure 4 - Emergency response 		

1. Purpose

1.1 To define the process for recording and responding to environmental complaints received by Sentrex Support Services.

2. Scope

2.1 This procedure covers all formal environmental complaints relating to the activities, products and services of Sentrex.

3. Definitions

3.1 Environmental complaint:

3.1.1 A documented critical observation or query about the Company's environmental aspects, policy, management system or performance, from interested parties requesting a response or remedial action, or otherwise worthy of response.

3.1.2 A complaint, verbal or otherwise, from an employee regarding environmental aspects and their management and to which the employee requires a resolution and/or which requires senior management consideration.

4. Responsibilities

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Environmental Management System	

4.1 The initial recipient of a complaint is responsible for determining whether the complaint qualifies for action under the provisions of this procedure, in association with the complainant. In the case of dispute, the complainant will refer the complaint to the Managing Director for adjudication.

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4.2 The Managing Director is responsible for maintaining a register of environmental complaints and complaint referrals.

4.3 The Managing Director, or his nominated representative, is ultimately responsible for ensuring appropriate actions are taken to investigate all environmental complaints documented in accordance with this procedure, and that where necessary, communications are held with the relevant interested parties (in compliance with the appropriate procedure).

4.4 Site Supervisor, Line Managers and Site Managers are responsible for ensuring that environmental complaints, which relate to their area of responsibility, are investigated and the results of investigations forwarded to the Managing Director.

4.5 All employees are responsible for contributing to the planned resolution of complaints, in so far as they relate to matters within their control.

5. Procedure

5.1 All environmental complaints will be reported and recorded on an Environmental Complaint and Incident Log Sheet (see attached sheet).

5.2 The complainant will be informed of the actions being taken as a consequence of the complaint, within 21 days of the complaint first being received.

5.3 A copy of a completed log sheet will be forwarded to the Managing Director, or nominated representative, within seven working days of the initial receipt of the complaint.

5.4 The Managing Director or nominated representative will confirm receipt of the log sheet and maintain a record of the complaint.

5.5 For each recorded complaint, a corresponding Environmental Complaint and Incident Action Form (see attached sheet) will be completed by a Line Manager/ Site Manger/Supervisor, as appropriate.

5.6 The completed action form will be returned to the Managing Director within 28 days, together with a copy of the original complaint correspondence.

5.7 Persistent or unresolved and repeated complaints will first be passed to the relevant representative on the Management Team and then, if necessary, to the Managing Director in accordance with the provisions of this procedure.

6. Further References

None.

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7. Record Forms

Environmental Complaint and Incident Log Sheet

Environmental Complaint and Incident Action Form

Sentrex Support Services	
Environmental Management System	

Environmental Complaint and Incident Action Form

Complaint/Incident Reference No:	Date received:
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Complaint Details

Activities or operations causing the complaint/incident

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Solution/Remedial Actions

Remedial actions required/proposed

Target date for completion of remedial actions:

Date response (to be) sent to complainant:

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Additional information

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Form completed by

Name: Position:

Department:

Site: Date:

PLEASE RETURN TO MANAGING DIRECTOR

Tel : 0800 783 6103

Sentrex Support Services	
Environmental Management System	

Procedure Title: Site Management		Procedure No: 9
Date issued: 03.04.04	Last revised: 14.5.05	Revision No: 04.0
ISO 14001 reference: 4.4.6		
O M reference:		
Related procedures:	<ul style="list-style-type: none"> ■ Procedure 19 - Maintenance of Register of Applicable Legislation and Other Requirements ■ Procedure 1 - Communications ■ Procedure 12 - Resources/Consumables ■ Procedure 12 - Contractor management on-site 	

1. Purpose

1.1 To set out the requirements relating to the general management of operational sites in meeting the aims of Sentrex Support Service's Environmental Policy.

2. Scope

2.1 This scope of this procedure covers all sites, both indoors and outdoors, under the management control of Sentrex Support Services.

3. Definitions

3.1 Site /operational site– means all internal and external areas occupied or controlled by Sentrex Support Services.

4. Responsibilities

4.1 A nominated Director of Sentrex Support Services will have ultimate responsibility for the management of sites.

4.2 It is the Site Managers'/Area Supervisors' responsibility to ensure that this procedure is implemented and enforced across all sites.

4.3 The Managing Director is responsible for providing advice relating to biodiversity on company sites.

4.4 It is the responsibility of all persons to comply with this procedure in so far as it related to areas under their control or influence.

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5. Procedure

5.1 Sentrex Support Service's sites will be managed in an environmentally responsible manner, ensuring that the buildings, land, plant or activities do not adversely impact on the local environment to an unacceptable level.

5.2 Actions will be taken to minimise and mitigate any potentially adverse impact on the environment (e.g. from contaminated soil, building materials, air emissions, gas migration, wastewater discharges, etc.).

5.3 The wildlife of the local environment will be protected from direct impact from the company's activities; this includes minimising the use of pesticides and artificial fertilisers, and using good husbandry to encourage native and natural flora and fauna. In addition the company will ensure that all pests and vermin are controlled on its sites.

5.4 Efforts will be made to preserve and promote biodiversity on company sites. Biodiversity in urban areas can be encouraged principally through wildlife gardens. Simple low-cost measures for consideration include building a pond, growing plants as nectar and pollen sources for insects, installing artificial sites for nesting for birds and insects, allowing areas of meadow to develop, creating cracks and crevices for insects, nurturing native trees, providing bird food and creating roof gardens.

5.5 An asbestos register will be maintained for all sites; asbestos in the workplace will be controlled through regular monitoring, encapsulation and safe removal, where necessary.

5.6 The storage and use of hazardous substances on site will be minimised wherever possible and practicable. All stores containing hazardous substances will remain locked when not in use. All redundant substances will be removed at the earliest opportunity in compliance with the relevant legislative requirements.

5.7 The use of ozone depleting substances will be phased out at the earliest practical opportunity.

5.8 Smoking will only be permitted in designated areas, in accordance with the relevant policy.

5.9 All sites will be kept clear of litter and refuse will be stored in appropriate containers.

5.10 Best Practice principals relating to site management will be adopted, where practicable.

5.11 Environmental considerations will be incorporated into new design projects e.g. new premises/plant and into any company strategy.

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5.12 Only timber and timber products that have been lawfully obtained and have come from forests and plantations which are managed to sustain their biodiversity, productivity and vitality, and to prevent harm to other ecosystems and any indigenous or forest-dependent people, will be used on company projects and sites where we are able to control purchasing. Documentary evidence will be obtained and filed.

6. Further References

Scottish Natural Heritage www.snh.org.uk
The Wildlife Trust <http://www.wildlifetrusts.org/>
Scottish Environmental www.sepa.gov.uk
Protection Agency Business
and Biodiversity Resource <http://www.businessandbiodiversity.org/>
Centre

7. Record Forms

None.

