

The logo for FGH Security, consisting of the letters 'FGH' in a bold, white, sans-serif font.

FGH SECURITY QUALITY MANAGEMENT SYSTEM

# ENVIRONMENTAL POLICY

REF: PE07

## ENVIRONMENTAL POLICY

### 1. POLICY STATEMENT

- 1.1. FGH Security and its Senior Management will comply fully with the letter and spirit of environmental laws and regulations, and strive to secure fundamental reforms that will improve their environmental effectiveness and reduce the cost of compliance.
- 1.2. FGH Security will consider environmental factors and the full acquisition, use, and disposal costs when making planning, purchasing, and operating decisions. FGH will favour suppliers who complement our environmentally focussed values.
- 1.3. Work continuously to improve the effectiveness of our environmental management system (EMS).
- 1.4. Provide appropriate environmental training and educate employees to be environmentally responsible and have a ensure that each employee has a relevant level of competency for their responsibility in relation to the EMS.
- 1.5. FGH Security will perform periodic reviews of its operation to ensure that it identifies all applicable environmental risks and takes appropriate action to managed and mitigate them.
- 1.6. Monitor our environmental impact and performance regularly in terms of; Preventing pollution, sustainable resource use, climate mitigation and adaption, the environmental context of the organisation, responsible waste disposal, control of emissions and compliance obligations.
- 1.7. Set key objectives, with applicable KPIs if required, through all levels of its organisation.
- 1.8. Seek to prevent pollution before it is produced, reduce the amount of waste at our offices and during our operation and support pollution prevention by our customers and suppliers.
- 1.9. Use energy efficiently throughout our operations, and support the efficient use of gas and electricity by our customers and suppliers.
- 1.10. Re-use and recycle whenever possible.
- 1.11. Use environmentally preferred materials.
- 1.12. Work cooperatively with others to further common environmental objectives.
- 1.13. Communicate and reinforce this policy at all levels throughout the company and make it available to all.
- 1.14. FGH security will have a clear communications strategy which will keep relevant stakeholders informed about it's environmental performance and will allow employees to make improvement suggestions.

### 2. AIMS

- 2.1. The aims of this policy are to:
  - 2.1.1. To significantly reduce the environmental impact which FGH Security has on the environment through its activities and to establish relevant and measurable targets.
  - 2.1.2. To encourage all members of our organisation to consider the environmental impact that their actions have in; making their way to their place of work, whilst at their place of work and when making their way home.
  - 2.1.3. To encourage an environmentally focussed culture where employees will help and guide each other to make environmentally conscious decisions through all levels of the organisation. This includes senior strategic decisions which will consider environmental impact.

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- 2.1.4. To encourage sustainability in the company and develop efficient ways and methods of working which are environmentally viable.
- 2.1.5. To ensure that the company complies with all relevant environmental legislation through all activities it undertakes.

## 3. SCOPE

- 3.1. All employees are subject to the provisions of the Environmental Policy.
- 3.2. Employees are governed by the Environmental Policy at all times when engaging in any activity that could potentially damage the environment. These activities include, but are not limited to energy use, waste disposal and emissions to air.
- 3.3. The application and operation of this procedure will be consistent with the Equality and Diversity policy. The impact of the policy will be monitored and reported to the Managing Director.

## 4. RECORDS MANAGEMENT

- 4.1. The records associated with this policy are controlled and will be created, stored and disposed of in line with the company's records management procedures.
- 4.2. FGH Security is committed to complying with the requirements of Data Protection legislation and regulations and any personal data created as part of this policy will be processed in accordance with the company's Data Protection procedures. This includes ensuring that data is held securely, is not disclosed unlawfully and is destroyed when no longer needed.
- 4.3. FGH Security also aims to ensure that users of this policy are aware of Data Protection, Freedom of Information and Records Management issues associated with this policy.

## 5. RISK MANAGEMENT

- 5.1. Failure to comply with this policy could lead to breaches of environmental legislation. These may give rise to civil claims or criminal proceedings against FGH Security as well as unacceptable damage to the environment.
- 5.2. Failure to adhere to the material points contained in the policy could result in failure to attain, or subsequent withdrawal of, ISO14001 accreditation.

## 6. ROLES AND RESPONSIBILITIES

- 6.1. It is the responsibility of employees to:
  - 6.1.1. Be aware of the company's Environmental Policy.
  - 6.1.2. Attend any mandatory training.
  - 6.1.3. Recognise potential environmental issues.
  - 6.1.4. Comply with the provisions of the environmental policy.

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- 6.1.5. Encourage other employees to commit to making the policy effective.
- 6.1.6. Report any identified environmental issues to the Senior Management team promptly.

### 6.2. It is the responsibility of supervisors to:

- 6.2.1. Understand and comply with the company's Environmental Policy.
- 6.2.2. Refer employees for necessary information, instruction and training.
- 6.2.3. Enforce compliance with the policy.
- 6.2.4. Ensure that potential environmental issues are correctly recognised.
- 6.2.5. Ensure that procedures are correctly applied by front line operatives.

### 6.3. It is the responsibility of Managers to:

- 6.3.1. Understand and comply with the company's Environmental Policy.
- 6.3.2. Refer employees for necessary information, instruction and training.
- 6.3.3. Monitor compliance with the policy.
- 6.3.4. Produce suitable guidance for all activities undertaken.
- 6.3.5. Ensure copies of relevant documentation are available on all sites.
- 6.3.6. Investigate breaches and review procedures accordingly.

### 6.4. It is the responsibility of the Senior Managers to:

- 6.4.1. Provide advice and support for Managers.
- 6.4.2. Ensure the company's policy is widely available and understood.
- 6.4.3. Review and monitor the operation and effectiveness of the policy and make relevant risk based assessments to ensure the company minimises or eliminates its environmental impact.
- 6.4.4. Ensure that advice is available from suitably qualified professionals and the appropriate levels of competence is in place within the organisation to meet its environmental requirements.
- 6.4.5. Monitor environmental data, ensure targets are being met and improve the EMS periodically.
- 6.4.6. Produce reports for the organisation regarding environmental performance and ensure these are adequately communicated.
- 6.4.7. Conduct an annual organisational environmental performance review.
- 6.4.8. Ensure compliance with legal obligations and best practice.

### 6.5. It is the responsibility of the Managing Director to:

- 6.5.1. Ensure that the Environmental Policy is adhered to throughout the company.
- 6.5.2. Ensure that sufficient resources are allocated to facilitate this policy.
- 6.5.3. Review associated data and take appropriate action where required.
- 6.5.4. Establish quarterly review of environmental impact to ensure the company is on track to meet annual objectives and targets and ensure that there is a consideration of the environment in strategic planning decisions.
- 6.5.5. Conduct an annual review to ensure targets have been met and perform root cause analysis in any instances where this is not the case.

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### B. PROCEDURAL GUIDELINES

The normal expectation is that the following procedural guidelines will apply. However, on occasions, and for exceptional / other good reasons, there may be the need to vary the procedures to suit individual cases, and accordingly FGH Security reserves the right to amend the procedures.

Failure to comply with these procedures without sufficient reason may give rise to disciplinary action and attention is drawn to the Disciplinary Policy.

#### 1. SETTING STANDARDS

- 1.1. FGH Security will seek to adhere to the standards laid out in ISO14001 and contribute to the ongoing development of the standard where possible.

#### 2. ENCOURAGEMENT AND SUPPORT BY SUPPLIERS AND CONTRACTORS

- 2.1. FGH Security will provide this policy to all of its suppliers and contractors and it will favour suppliers/contractors who share their environmental values.
- 2.2. The FGH Procurement and Logistics procedure favours suppliers who also have ISO14001 accreditation.
- 2.3. Where practically possible FGH Security will help its suppliers and contractors to reach their own environmental targets.
- 2.4. In return FGH expects that their suppliers will help and support FGH in reaching its own environmental goals.
- 2.5. FGH will actively seek to establish strategic supply partnerships which place reducing collective environmental impact at the forefront of the relationship.

#### 3. EDUCATION AND INVOLVEMENT OF EMPLOYEES AND LOCAL COMMUNITY

- 3.1. FGH will ensure that all staff are made aware that everyone working on behalf of FGH Security has a responsibility to try and reduce the environmental impact of their day-to-day work activities and improve the sustainable development culture.
- 3.2. FGH Security view this as a whole as a corporate endeavour.

#### 4. CONSIDERATIONS TO OUR ACTIVITIES AND SERVICES EMISSIONS TO AIR

- 4.1. FGH will minimise and reduce the amount of carbon released into the atmosphere due to;
  - 4.1.1. Company vehicle usage. This includes supervisory vehicles and vehicles allocated to specific client sites.
  - 4.1.2. Managerial and supervisory staff personal vehicles which are used during the course of company business.
  - 4.1.3. FGH will measure its performance in these two areas on a quarterly basis and reach reduction targets year on year with a view towards meeting our long term objectives by 2020.

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- 4.2. FGH will actively encourage frontline, supervisory and managerial staff (including Directors) to take public transport, lift share and/or utilise any group transport that FGH provide.
- 4.3. FGH will measure the percentage of staff using a sole occupancy vehicle to commute to their place of work twice a year and aim to meet reduction targets year on year with a view towards meeting our long term objectives by 2020.
- 4.4. FGH will aim to work with local suppliers where possible to minimise and reduce the amount of carbon released into the atmosphere due to transportation of goods.
- 4.5. Where this is not applicable FGH will seek to minimise the amount of deliveries FGH receives as much as possible without impacting on our service delivery.

## 5. RELEASES TO WATER

- 5.1. As part of our operation FGH have no direct releases to water.
- 5.2. If FGH are required to use an external service which could impact this (e.g. a car wash for company vehicles) FGH will look to procure a service which has the least possible environmental impact.

## 6. RELEASES TO LAND

- 6.1. As part of our operation FGH have no direct releases to land.
- 6.2. If FGH are required to use an external service which could impact this (e.g. disposal of radio batteries) FGH will look to procure a service which has the least possible environmental impact.

## 7. USE OF ENERGY

- 7.1. FGH Security will continuously seek ways to reduce its direct and indirect use of fossil fuels with the objective of ultimately eliminating their use altogether.
- 7.2. FGH Security will seek to reduce its electricity and gas consumption as much as is practically possible. This includes procuring the most energy efficient appliances possible.
- 7.3. FGH Security will seek to reduce its and its client's carbon emissions as far as practically possible.
- 7.4. FGH will work with our clients to identify how FGH can help them reduce their consumption of gas and electricity (e.g. Security Operative switching off any lights accidentally left on).

## 8. USE OF RAW MATERIALS AND NATURAL RESOURCES

- 8.1. FGH will minimise the quantity of raw materials and natural resources it used during the course of its operations.
- 8.2. Where raw materials and/or natural resources are required the company will look to procure the most environmentally sustainable option and/or that which minimises environmental impact.
- 8.3. FGH will monitor the percentage of raw materials utilised by the organisation which are environmentally sustainable on a quarterly basis and reach specific targets year on year with a view towards meeting our long term objectives by 2020.
- 8.4. FGH will look to reduce the quantity of paper it uses as much as possible. Specifically, it will look to make as many of its core documents and record keeping electronic as possible.
- 8.5. FGH will monitor the reduction in number of sheets printed by the organisation and the number of core documents migrated to electronic versions on a quarterly basis and reach specific targets year on year with a view towards meeting our long term objectives by 2020.



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8.6. FGH will work with its suppliers and/or choose suppliers who share the company's focus on using environmentally sustainable options and reducing their environmental impact as much as possible.

## 9. WASTE AND BY-PRODUCTS

9.1. FGH Security will continuously seek to reduce our waste arising and maximise the amount FGH recycle.

9.2. We will broaden the range of materials which the company can directly recycle.

9.3. We will minimise the amount of waste which is not reused or recycled and is sent to landfill.

9.4. We will monitor the percentage of items recycled or reused by the organisation on a quarterly basis and reach specific targets year on year with a view towards meeting our long term objectives by 2020.

9.5. In situations where item disposal will have an adverse environmental impact (e.g. radio battery disposal) FGH will work with specialist disposal agencies to ensure they are disposed of in an environmentally responsible manner with a view towards meeting our long term objectives by 2020.

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### Appendix A – Legislation Affecting this Policy

All of FGH Security's business processes will comply with all environmental legislation. Which includes:

- Control of Pollution Act 1974 amended 1989
- Landfill Tax Regulations
- Environmental Act 1995
- Waste Management Regulation
- Hazardous Waste Regulations
- Environmental Protection Act
- Waste Batteries and Accumulators Regulations 2009 SI 890
- WEE Regulations 2009 & 2013
- Transfrontier Shipment of Waste (Amendment) Regulations 2014 SI 861
- Air Quality Standards Regulations 2010 No. 1001
- Clean Air Act 1993
- Air Quality (England) Regulations 2000 SI 928
- Air Quality (England) (Amendment) Regulations 2002 SI 3043
- Climate Change Act 2008
- Electricity and Gas (Carbon Emissions Reduction) Order 2010 SI 188
- Electricity and Gas (Carbon Emissions Reduction) (Amendment) Order 2010 SI 1958
- Carbon Accounting Regulations 2009 SI 1257
- Carbon Accounting (Amendment) Regulations 2009 SI 3146
- Cleaner Road Transport Vehicles Regulations 2011 SI 1631
- Control of Noise (Codes of Practice for Construction and Open Sites) (England) Order 2002 SI 461 Environmental Noise (England) Regulations 2006 SI 2238, Environmental Noise (England) (Amendment) Regulations 2008 SI 375
- Statutory Nuisance (Appeals) Nuisance Amendment Regulations
- Environmental Permitting (England and Wales) Regulations 2010 SI 675
- Environmental Offences (Fixed Penalties) (Miscellaneous Provisions) (Amendment) Regulations 2012 SI 1151
- Environmental Protection Act 1990 (Amendment of Fixed Penalty Amount) (England) Order 2012 SI 1150
- Regulatory Enforcement and Sanctions Act 2008
- Regulatory Enforcement and Sanctions Act 2008 (Amendment of Schedule 3) Order 2013 SI 2215 Environmental Protection Act 1990