

ENVIRONMENTAL AND ENERGY POLICY AND MANAGEMENT SYSTEM

4.2. GENERAL POLICY STATEMENT

PNG Ltd (“the Company”) and its associated companies, are committed to operating its business in an environmentally sensitive way with proper regard to its legal obligations under the Environmental Protection Act 1990 and all relevant directives, regulations and codes of practice made from time to time.

The company recognises the main areas in which it impacts upon the environment and is committed to continuously improving its performance in these areas. This includes the reduction in energy, reduced fuel consumption, maximum waste recycling and prevention of pollution.

This policy will be reviewed by the Health and Safety Director on an annual basis, when objectives and targets will be set.

ENVIRONMENTAL MANAGEMENT SYSTEM

4.3. PLANNING

4.3.1. Scope and Environmental Aspects

PNG Ltd is a diverse human resources outsourcing company. The core business is recruitment, with over 200 branches nationwide. Other non-core activities include specialist recruitment, training and e-technology.

The head office is at Meriden Hall, Warwickshire, where the Board and functional heads are based. Although the company uses technology to drive business, many of the systems remain paper-based. The first challenge is, therefore, to re-cycle waste in the most environmentally friendly way.

With a broad customer base and the need to travel to attend training courses, conferences and meetings, PNG staff are heavily reliant upon company cars, which number almost 600. The second challenge is to reduce the use of fuel to a minimum.

Being a decentralised business, there are many branches and offices consuming energy in the form of heat, light and power. The third challenge is to reduce energy consumption to a minimum.

Finally, PNG will endeavour to dispose of items for re-use or re-cycling where possible (e.g., IT equipment etc.)

4.3.2 Legal and Other Requirements

The Health, Safety and Environmental Director maintains a procedure to identify and access to legal and other requirements applicable to the environmental aspects of its activities and services. This includes Croner, internet access and subscription to various environmental publications.

These legal requirements include, but are not restricted to:

Health and Safety at Work etc Act 1974;
Environmental Protection Act 1990;
Environmental Protection (Duty of Care) Regulations 1991;
Control of Substances Hazardous to Health Regulations 1999.

4.3.3. Objectives & Targets

The company has identified the four most significant impacts on the environment:

- disposal of waste (particularly paper);
- company car fuel usage;
- energy usage;
- management of consumables.

Targets for each of the above will be set annually and approved by the Board.

4.3.4. Environmental Management Programme

The four objectives are to be met using the methods and personnel outlined below:

Objective 1

Paper

- branch/office managers to identify the local arrangements for the recycling of waste paper
- branch waste to be managed in appropriate manner
- all staff to use recycled paper wherever possible
- re-use single-sided scrap paper for note taking
- photocopy double sided wherever possible

Objective 2

Company car usage

- managers to identify journeys which could better be completed using public transport
- managers to monitor unnecessary journeys and ask staff to avoid
- all staff to avoid travel in congested times
- encourage car sharing wherever possible
- Fleet manager to consider environmental performance in company car specification.

Objective 3

Energy usage

The company will try to consistently reduce its energy consumption. An annual audit of energy usage will be undertaken and annual objectives and targets set.

The company will endeavour to achieve its energy consumption reductions by:

- promoting good housekeeping
- thermostats to be set at not more than 20° C in all offices and branches
- ensure that all lights, heating, equipment and air-conditioning is switched off when not required
- all computer equipment to be switched off when not in use
- air-conditioning to be correctly controlled

Integrating energy efficiency

- The HSE Director will identify the current position and set reasonable but demanding targets to meet the objectives.
- The objectives will be reviewed annually when revised targets will be set and other objectives introduced as appropriate.

Objective 4

Consumables

The company will forward items for re-use or recycling wherever possible, e.g., obsolete IT equipment, photocopiers, faxes etc., to supply charities, schools etc.

4.4. IMPLEMENTATION AND OPERATION

4.4.1. Structure and Responsibilities

The information below sets out the allocation of responsibility within the Company for environmental matters:

- i) the Health and Safety Director is responsible for co-ordinating environmental policy and for keeping the board of directors of the Company informed of all matters relating to the environment which affect the Company or its employees. The Health and Safety Director is therefore responsible for the adoption and annual updating of this system for ensuring that all employees in a managerial position within the Company understand their responsibilities under it. The Health and Safety Director will also produce and update the systems and procedures which are required as a result of this policy including:
 - a) an annual environmental audit of the company's activities;
 - b) an annual assessment of the company's energy consumption including comments and observations on how this may be reduced consistent with the needs of the business;
 - c) introducing specific environmental criteria to be operated by persons responsible for purchasing consumable goods (such as paper and toner cartridges) and the auditing of the same to ensure the most environmentally friendly products are used;
 - d) the segregation and recycling of waste generated in the course of the Company's normal business operations;
 - e) setting and monitoring targets for meeting environmental objectives;
 - f) ensuring that the Board and all staff are aware of this policy;
 - g) an annual review of this policy and rules made under it;
 - h) reporting and discussion of environmental issues at the Health, Safety and Environmental Committee.

- i) ensure that resources are provided for the implementation and control of the environmental management system.
- ii) Branch and office managers will be responsible for the achievement of the objectives in the environmental management system. This will be limited to their area of control and responsibility, with the results co-ordinated by the HSE Director.
- iii) Directors will be in agreement with the objectives and shall monitor progress towards their achievement in the region under their control.

4.4.2. Training, awareness / competence

The company has a process of identifying training needs through the appraisal system.

All managers complete the 2-day CIEH Managing Safety course and this policy is distributed to all staff in hard copy and accessible through the company intranet.

4.4.3. Communication

Two way communication will be encouraged through the HSE Committee and by e-mail from head office to the branches.

Regular environmental tips emanate from the HSE Department in head office, many of which will originate from regular communication with the branches.

The monthly HSE Committee will identify areas of environmental interest and take appropriate action. All external communications shall, in the first instance, be dealt with by the HSE Director, who will communicate with others in the organisation as appropriate.

4.4.4/5 Document Control

All documents relating to the environmental management system shall be under the control of the HSE Director. His responsibility is to review policy and procedure and seek Board approval for action taken.

The HSE Director will control all relevant documents and ensure that current versions are available to relevant staff, both in hard copy and on the intranet.

4.5. CHECKING AND CORRECTIVE ACTION

4.5.1. Monitoring and Measurement

The HSE Director will work with the branches and the accounts department to establish a base point from which to set objectives and targets. This gathering of information will be carried out annually to set targets for the whole year.

The HSE Director will maintain a system of identifying new or forthcoming legislation which may impact on the business.

4.5.2. Non-conformance and Corrective Action

The Health and Safety Director will monitor progress towards the objectives on a quarterly basis. Significant deviations from the anticipated progress will be communicated to the manager through the director in charge.

4.5.3. Records

Environmental records shall be established and maintained by the HSE Director at head office. The records include training records and the results of audits and reviews.

4.5.4. Environmental Management System Audit

The environmental management system will be audited annually by the HSE Director and the Quality Manager.

The information on the results of audit shall be presented at the HSE Committee.

4.5.6. Operational Control

(Exclusion)

4.5.7. Emergency Preparedness and Response

(Exclusion)

4.6. MANAGEMENT REVIEW

The HSE Director will carry out an annual review of the environmental management system to ensure its continuing suitability, adequacy and effectiveness. The review will be documented and presented to the HSE Committee and will address the need for changes in policy or new objectives and targets.