

Title	Group Environmental and Sustainability Policy		
Code	QA04	Date	February 2022
		Issue number	24
Authorised by	M. Brabin (CEO)	Signature	
Reason for Amendment	Annual Review		

ISO14001

1.0 Reference

1	ISO14001	Section 4.1	"General Requirements"
1.1	ISO14001	Section 4.2	"Environmental Policy".

2.0 Scope

This policy applies to all divisions, products, and operations within the PHS Group.

3.0 Policy

PHS acknowledge that its products and services have an impact upon our environment and has completed impacts assessments to ensure that the most significant impacts are managed. PHS is committed to reducing the impact of its operations and services and, where it is cost effective, PHS invests in sustainable processes. These processes will be captured within our externally verified ISO 14001 Environmental management system.

To support sustainable growth and minimise our impact on the environment, PHS commits to:

- identifying environmental aspects and impacts of the business
- setting challenging, impact reduction objectives to reduce our significant impacts
- achieving and exceeding compliance requirements against all relevant environmental legislation and other commercial requirements to which the group subscribes. e.g., ISO14001.
- incorporating environmental considerations into our supply chain, the design of our products and the planning of our services.
- reducing, re-using and re-cycling materials and products wherever possible.
- educating and engaging customers, suppliers and employees to understand our environmental impacts and sustainability issues
- engendering in all employees, a collective commitment to achieving our environmental objectives.
- continually improving our environmental management systems.
- identifying environmental best practices to reduce our environmental impacts.
- diverting most customer offensive waste to sustainable recovery options.
- the provision of services which prolong product life cycles and reduce waste electrical and electronic equipment.
- making this policy available to all employees on the phs intranet and to other stakeholders on request.

4.0 Environmental Policy Provisions

ISO 14001 - Environmental Management Standard

PHS will provide an environmental management system applicable to all PHS Group sites. However, not all sites will be verified externally to ISO standard requirements. Those that are in the scope of our certification are recorded on our ISO14001 certificate annex. The QuES team (Quality, Environment and Safety) will continually improve the PHS management system, monitor and measure compliance against legal requirements and meet stakeholder requirements.

Impact Assessments

Impact assessments will be completed for tasks, projects, changes or processes that have a significant environmental impact. Impact assessments will be reviewed every two years by site management teams. The assessment will determine the required control measures, training needs and resource requirements to ensure we minimise our environmental impact.

Legal Evaluation

The QuES team review environmental legislation on a regular basis using environmental circulars, trade association communications and the new legislation section of legislation.gov.uk. The QuES team will ensure that the group legal register is kept up to date with all applicable requirements, as well as any other requirements specified by external stakeholders.

Any new applicable legal requirements will be reported to the Executive Team promptly and a gap analysis, training needs analysis and procedural review completed. This will ensure that the requirements are understood by all relevant stakeholders, appropriate training provided, and procedures are appropriately amended.

Training

All employees will receive an environmental induction and complete refresher training triennially to ensure they have an awareness of the company's environmental requirements.

Competency

The Quality, Environment and Safety Team (QuEST) will provide managers with at least IEMA Practitioner competency and annually invest in continued professional development for each. These managers will visit each PHS site a minimum of 2 times per year to review environmental performance, provide coaching and support environmental impact reduction initiatives.

PHS Sites with Waste Management Licences or Environmental Permits, will have a minimum of one manager who has completed a technical competence qualification: -

The QuEST team will ensure that the WAMITAB approved technical competence training centre remains registered and provide training to all new waste facility managers who require a certificate of technical competence. Competency levels are defined as-

- **Existing Managers** - HROC4A Transfer of hazardous waste
- **New Managers** - HROC4A Transfer of hazardous waste & HROC6 Managing Physical and Chemical Treatment of Hazardous Waste (including clinical waste)

Documentation and records

PHS will maintain a document and records control procedure which specifies the requirements for the generation, authorisation, retention, communication, and disposal of all PHS environmental documentation. This will ensure that accurate, relevant and up to date documentation is communicated and that records are retained and disposed of in accordance with legal, business and stakeholder requirements.

Policy Review and Communications

The QuES team will conduct an annual review of the management system and assess performance against relevant environmental objectives. The outputs will be reviewed with the PHS Executive team and updated plans communicated to the business as well as any relevant external stakeholders.

In addition, QuEST regional managers will meet with the divisional senior teams, at least once per annum, to review division specific performance, discuss progress against objectives and identify new environmental requirements for the forthcoming year.

Progress against agreed objectives will be monitored on a per period basis (13 times per annum) and the results reported in the QuEST report to the Executive Committee.

Incident reporting

All environmental incidents are reported to QuEST (via incidents@phs.co.uk) in accordance with the incident reporting procedure. Environmental incidents will be investigated comprehensively to identify the root cause and determine corrective and preventative actions that eliminate, or at least reduce, the probability of re-occurrence. Incident data will be analysed on a per period basis, to identify trends which could develop the management system and reduce environmental impacts.

Emergency Arrangements

All PHS sites will maintain an emergency plan to ensure a prompt and efficient response to environmental emergencies identified in its impact assessments, these arrangements will be tested via regular drills and the results used to develop and improve the emergency plan.

Procurement

PHS maintain a supplier pre-qualification scheme that requires all suppliers to sign up to the PHS Code of Conduct, which specifies minimum environmental standards. The pre-qualification scoring systems is based on the key requirements of ISO 14001 to ensure that the minimum standards set are suitable to achieve our environmental requirements.

Significant Impacts

Waste - PHS endeavour to choose the most environmental waste treatment or disposal methods for all waste transferred by the group or produced within the businesses. This includes re-use, recycling and energy recovery. PHS monitor available waste treatment solutions regularly, to ensure that we are using the most cost-effective environmental treatments

All PHS sites will complete and maintain a waste map identifying all the wastes they retain on site and the disposal stream for each. Suitable waste receptacles will be provided, and clearly labelled, to indicate the wastes that can be deposited within them.

Only authorised waste carriers will be utilised by PHS to transport waste and a waste transfer note produced/obtained for every movement. Waste will only be sent to environmentally permitted sites, for processing and will complete duty of care audits biennially to ensure that the wastes are processed in accordance with legal requirements.

Where hazardous waste is handled by PHS, a hazardous/special waste consignment note will produced/obtained along with the quarterly consignee return and the documents reviewed to ensure that the waste presented for processing has reached its final destination and been processed in accordance with specified instructions.

All waste documentation will be held electronically or in dedicated folders at the site in which the waste was deposited or generated. Waste documentation will be retained in accordance with legal requirements.

Energy – PHS recognises that the consumption of energy associated with its activities can have a significant effect on the environment and continually seeks opportunities to minimise the energy used by its infrastructure and the products that it places on the market.

Energy consumption at all sites is monitored via an in-house reporting system, to ensure that spikes in consumption are addressed and longer-term trends identified. Several of our high consumption sites have signed up to Climate Change Agreements, which provide us with incentives to manage our energy consumption more efficiently.

Gas systems will be serviced annually by a registered gas safe engineers and reviewed internally on a periodic basis, to ensure they work efficiently. Mains gas supply isolation points will be clearly marked, free from obstruction and indicated on the site emergency plan.

Air conditioning systems will be serviced, maintained and leak tested by competent engineers in accordance with the frequency specified in the F-Gas Regulations and an F-gas Register maintained on relevant sites, providing details of all the systems on site. Where refrigerant gases are removed from air conditioning systems, the relevant waste documentation will be obtained and retained on site, in accordance with legal requirements.

Motive fuels are a significant impact of the business for service and business travel. In order to monitor and improve fuel efficiency, PHS use vehicle telemetry and route optimisation software, supported by speed limiters, driver training and management supervision. This focus on efficient driving and speed awareness suitably manages the impacts of fuel consumption.

PHS operates a company car opt out scheme, providing employees with a financial incentive to select a lower carbon emitting vehicle.

Water - Where required, PHS will ensure that it obtains a consent to discharge the effluents created by our operations and confirm that the thresholds specified in the consent are adhered to. All sites will ensure water efficiency measures are maintained by carrying out preventative maintenance on water equipment and preventing leaks.

All drains will be clearly marked to indicate their purpose i.e. foul sewer drains marked in red and surface water drains marked in blue. Drains will be regularly inspected, kept free from debris and litter and nothing but rainwater allowed to enter surface water drains.

Water supply isolation points and water hydrants will be clearly marked, free from obstruction and indicated on the site emergency plan.

Chemicals, Oils, Lubricants and Fuels – Material safety data sheets will be obtained for all chemicals used on PHS sites and in its products, and COSHH assessments completed where appropriate to determine appropriate control measures.

Liquid chemicals will be retained in the containers they are delivered in and stored on secondary containment units (bunds) capable of holding 110% of the volume of the largest container on the bund.

Bulk Fuels and additives will be stored in tanks that meet OFS T200 or British Standard 799-5 Oil storage tanks standards, where this is not possible, the tank will be stored in a bund able to contain 110% of the contents of the tank and all tank ancillaries will be contained within the bund. Fuel storage tanks and the transmission pipework will be regularly inspected by an appropriately qualified contractor to ensure that their integrity has not been compromised.

Flammable chemicals will be stored in approved containers or BS EN14470-1 Fire resistance lockers.

Chemical and oil spillage kits, capable of absorbing 100% of the contents stored on site, will be located close to the relevant storage areas, and drain blockers will be utilised where an environmental risk assessment deems them necessary. Regular drills are carried out to ensure that response times are kept to a minimum.

Site Maintenance & Housekeeping – All PHS sites are subject to a programme of inspection and preventive maintenance to ensure that site infrastructure is maintained in a condition that maintains its optimum efficiency and minimises our impact on the environment.

Housekeeping measures will be completed on all sites, at least daily, to ensure our processes do not produce litter.

All sites will have pest control contractors and a minimum of rodent bait stations suitable to reduce the impact of rodent activity. Contractors must be British Pest Control Association accredited.

Odour – PHS operates waste transfer stations that can create offensive odours, to mitigate this impact, waste will be contained in appropriate receptacles, transferred from site regularly, doors will be kept closed when not in use and regular monitoring of odour levels will be carried out.

Noise – PHS monitor noise at sites where noise impacts have been identified utilising an initial noise assessment by a competent contractor followed by regular monitoring using basic noise metering. These checks are recorded during internal audit.

Site Security – Vandalism and theft can lead to significant environmental impacts. All PHS sites will maintain a security risk assessment specifying the risks relevant to their site and ensure that identified control measures are maintained.

Internal Audit

Annual Internal audits will be carried out by the QuES Team in all parts of the business, to determine whether the controls specified in the environmental management system have been applied and evaluate whether they are still capable of managing impacts on the environment.

The internal audit process is supported by an escalation process, which ensures that the most significant environmental non-conformities are reviewed, understood and actioned by the Executive Team in a prompt and efficient manner.

Continual Improvement

The QuEST Team will use the results of performance monitoring & measurement to develop the environmental management system based on the most significant impacts and issues faced by the business whilst considering best available techniques and technologies.

Challenging but achievable environmental improvement objectives will be agreed annually at relevant functions and levels within the business and detailed using the S.M.A.R.T method. These will be based on the significant impacts and horizon planning of the business and ensure a measurable performance plan is in place.