



<u>Policy Title</u>	Environmental Management
<u>CCMT Sponsor</u>	Director of Resources
<u>Department/Area</u>	Human Resources
<u>Section/Sector</u>	Health & Safety Department

1.0 Rationale

- 1.1 Organisations are increasingly taking environmental issues into account and implementing appropriate measures in respect of; energy consumption and efficient use of natural resources, effective controls to prevent pollution through spillage or discharge and ensuring any hazardous waste generated is correctly disposed of. New legislation continues to place more and more responsibility on organisations to adequately manage any potential environmental impact their operations may have.

2.0 Intention

- 2.1 All members of Thames Valley Police will endeavour to minimise the impact our operations and activities have on the environment. We will seek to protect the environment and strive to set an example to other organisations and the local community by ensuring compliance with all applicable environmental legislation.
- 2.2 Managers, where applicable, are to endeavour to prevent any potential pollution through adequate control of all waste generated and by taking strict measures to avoid any harmful discharges from areas such as vehicle workshops and any departments/units using chemicals or other hazardous substances. Effective emergency procedures are to be established and maintained with which to respond to any situation or condition on any of our sites or premises that could impact upon the environment.
- 2.3 The amount of waste we generate will be reduced as far as reasonably practicable and we will consider all opportunities for re-use and/or recycling. All hazardous waste created will be disposed of correctly and in accordance with guidance issued by the Environment Agency.
- 2.4 All new buildings and the major refurbishment of existing buildings will be designed with regard to energy efficiency and whole-life

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costs, which will facilitate the effective management of energy usage. All Force sites are liable to inspection by the Environment Agency (EA) and Local Authority Environmental Health Officers (EHO) for matters relating to the enforcement of environmental protection legislation. We will endeavour to work with our suppliers and contractors to minimise environmental risk in the supply chain through a purchasing policy founded on good stewardship, especially in respect of the use of sustainable materials.

3.0 General Principles

3.1 Modern society is based on accelerating technological changes, which have led to increased life expectancy and a marked increase in world population, all of which, places more demand on ever decreasing resources such as fossil fuels. Some of the key environmental issues facing world governments include: -

- a) Greenhouse Effect/Climate Change. The atmospheric accumulation of certain gases, (the greenhouse gases), are believed to be changing the Earth's energy balance so that global warming occurs. The principal greenhouse gases are carbon dioxide (CO₂), methane (CH₄), chlorofluorocarbons (CFCs) and halons. Emissions from human activities are creating a build up of these gases in the upper atmosphere, leading to an insulating effect and climatic change.
- b) Ozone Depletion. The ozone layer in the upper atmosphere protects the Earth's surface from harmful ultra violet rays from the sun, which can damage genetic material, harm plants and increase cancer risks in humans. However, holes in the ozone layer have appeared over the north and south poles. The major cause of such holes is believed to be the release of human-produced gases containing carbon and halogen atoms into the atmosphere. These include chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs) and halons that can remain the atmosphere for extensive periods.
- c) Acid Rain. Acid rain is formed by the emission of oxides of nitrogen (No_x) and sulphur (So_x) into the atmosphere when energy is generated from fossil fuels (coal, oil and gas), whether the fuel is burnt in the power station (to produce electricity), in buildings (for heating, cooking etc.), or in vehicles (hydrocarbon fuels). Acid rain results in the acidification of receiving waters and consequent damage to ecological systems especially lakes and forests. It also accelerates the weathering and decay of buildings and at high concentrations can cause a range of health hazards.
- d) Contaminated Land. Discharge of hazardous substances, (including toxic and explosive substances) poses a variety of

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risks to land. Land contamination can also have a significant effect upon watercourses particularly ground water systems, which can be difficult to remediate.

4.0 Challenges & Representations

- 4.1 Any person directly affected by this policy may make representations in relation to its contents and/or any decision in consequence of it to: -

Head of HR Department
Thames Valley Police Headquarters
Oxford Road
Kidlington
Oxfordshire
OX5 2NX

- 4.2 The areas covered by this policy are open to scrutiny by HM Inspector of Constabulary, the Environment Agency, Local Authority Environmental Health Officers (EHO) and other enforcement agencies during official inspections.

5.0 Guidance, Procedures & Tactics

- 5.1 Ultimate responsibility for compliance with the Environmental Protection Act and associated regulations rests with the Chief Constable and Police Authority. Responsibility is delegated to BCU/OCU Commanders and Heads of Department in the same way as for health and safety.
- 5.2 Business managers hold responsibility for efficient use of energy, within their BCU/OCU/Department, by ensuring the effective maintenance of buildings, equipment and plant. Business managers are also to ensure the effective management of waste, by monitoring the service provided by contractors appointed to carry out disposal of all controlled waste and by encouraging the minimisation of waste generated within their area of responsibility. Where accommodation and/or facilities are shared, responsibility will fall to the geographical business manager with appropriate delegation to local managers.

Pollution

- 5.3 There are several areas within the Force, which have the potential to cause pollution of the local environment. These include: vehicle workshops, which facilitate the storage of quantities of oil, helicopter refuelling tanks/bowsers and various departments/units such as scientific support (fingerprints and photographic) and scenes of crime, where chemicals and other hazardous substances are used.

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- 5.4 Managers of these areas are to ensure adequate control measures are in place to reduce the potential for pollution through spillage or leakage. Maintenance of all vehicle workshops is the responsibility of the Chiltern Consortium who will also manage the contract for disposal of waste oils. Emergency measures such as provision of spillage kits in high-risk areas are to be planned and implemented. All incidents involving pollution of any kind are to be reported immediately to the Health and Safety Department using Force Form PER 10c. The most likely effects of pollution are: -
- a) Land, river or ground water contamination caused by leakage or spillage of fuel oils, chemicals or other hazardous substances, either directly or via surface water drains.
 - b) Air pollution caused by smoke or fume emissions from, vehicles, boiler houses or other processes. Air pollution may affect, the ozone layer, add to global warming, affect breathable atmosphere or be washed by the rain to affect land or controlled waters and associated ecologies.
 - c) Noise pollution in relation to complaints from members of the public.
- 5.5 Any significant pollution of land, air or water is an offence. The Force would be liable for any clean-up costs, which could be considerable, and could also be prosecuted for any serious breach. Additionally there is the potential for civil litigation.

Waste Management

- 5.6 All personnel are to take appropriate action to minimise the amount of waste generated. Waste streams at all Force sites are to be actively monitored by local managers. Any potential opportunities for re-use/recycling are to be fully explored and, where appropriate implemented. Managers are to ensure procedures are followed for correct disposal of all hazardous waste. Managers are to ensure that private waste is not to be brought onto TVP premises for disposal via the Force contract as this could have cost implications. Detailed guidance on waste management, including central contractual arrangements is at [Appendix A](#).
- 5.7 Individual sites, which generate more than 200kgs of hazardous waste per year, must be registered with the Environment Agency (EA). BCU/OCU/Departments are responsible for providing their individual waste contractors with details of all registered sites within their areas and the type/quantity of waste generated. Sites must be re-registered annually.

NOT PROTECTIVELY MARKED**Energy Management**

- 5.8 The efficient use of energy is of national interest. The Government has identified energy efficiency as the cheapest and quickest way of abating global warming. We are all therefore required to identify and implement cost effective energy efficient measures, to include specific proposals for the installation of new energy saving systems, monitor energy consumption and endeavour to purchase energy at the most advantageous price.
- 5.9 The Force is committed to reducing energy costs and consumption to minimum levels commensurate with maintaining an efficient and comfortable working environment. The resulting reduction in energy consumption will contribute to reducing the risk of climate change by decreasing emissions of CO₂, NO_x and SO_x. Also, significant financial savings can be achieved by the adoption of careful management of resources. This includes: -
- a) Electricity. Savings can be made by simple measures such as the use of timer switches, reduction in the level of corridor lighting (without compromising safety) and by simply ensuring that all office, stores and accommodation lights are turned off when not in use.
 - b) Heating. Heating systems in most Force buildings are controlled by thermostat or computer. Sensors take time to adjust the boiler outputs and staff frequently open windows to compensate, thereby rendering systems ineffective and supplying heat to the outside air.
 - c) Water. A dripping tap or shower can lose up to 3.6m³ of water per day, which equates to 1314m³ per year. This is the equivalent amount of water needed to fill an average sized swimming pool twice and means £1025 being poured down the drain. Huge savings can be made, by simply ensuring taps and showers are turned off correctly when not in use, timely reporting of any defects noted such as dripping taps and by use of good maintenance procedures. Washing down vehicles is the largest consumption factor, accounting for an estimated 70% of some water utility bills. Controlling cleaning so that the process becomes a planned operation, restricting its frequency could have a significant impact on water usage.
- 5.10 Energy savings measures must be considered and implemented in the planning and construction of new buildings and any repairs and refurbishment of existing buildings. Staff must be encouraged to report defects when found and repairs must be affected without delay.

Monitoring

- 5.11 Monitoring of the level of compliance with environmental legislation and the contents of this policy will be carried out annually by the Health & Safety Department as part of the Force inspection process.

6.0 Communication

6.1 Links to Police National Legal Database Other

This policy will be published on the Policy Management Unit Intranet site.

6.2 Communications Strategy

Notification of this policy will be made via Weekly Orders, Managers Briefing and the Force web site.

7.0 Compliance and Certification

7.1 Human Rights Certification

(i) Legal Basis

Legislation relating to Environmental Management includes:

- a) Environmental Protection Act 1990
- b) Water Resources Act 1991
- c) Groundwater Regulations 1998
- d) Control of Pollution (Oil Storage) Regulations 2001
- e) Landfill (England & Wales) Regulations 2004
- f) Hazardous Waste Regulations 2005
- g) Waste Electronic and Electrical Regulations 2006

Any breach of the above legislation is a criminal offence, the maximum penalties are: -

- a) Magistrates Court-a fine of up to £20k;
- b) Crown Court-unlimited fine and individual prison sentences of up to 5 years in cases of gross negligence.

(ii) Human Rights Articles Engaged

This policy has the potential to engage the following articles of the convention:

- Article 6 – Right to a fair trial
- Article 14 – Prohibition of Discrimination

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Audited by: Sonia Ghatora

Audited on: 31-10-2007

(iii) Prohibition of Discrimination

Application of this policy could discriminate against individuals either directly or indirectly.

Article 14 states the enjoyments of the Rights and Freedoms set forth in the European Convention of Human Rights shall be secured without discrimination on any grounds, such as sex, race, colour, language, religion, political or other opinion, nation or social origin, association with a national minority, property, birth or other status.

Unless there is an infringement of another article, Article 14 will not apply as it is not freestanding. However actions and decisions taken as a consequence of this policy could be judged to be discriminatory in employment law if they are not applied fairly and impartially, having due regard for natural justice and human rights.

7.2 Diversity Impact Assessment

This policy has been assessed against the six strands of Diversity and has been rated as 'LOW' relevance.

7.3 Diversity (Human Resources)

In the application of this policy, the Force will not discriminate against any persons regardless of their gender, sexual orientation, race or ethnic origin, religion, age or disability.

7.4 Data Protection

Personal data and information processed in connection with this policy should be processed in accordance with the Data Protection Act 1998. It is acknowledged that "sensitive" personal data may be processed and this data will be protected in accordance with the requirements of the Act.

7.5 Freedom of Information Act

The policy is not protectively marked and is considered open/available to the public and without risk of a breach of security or impedance to the course of a criminal investigation.

This policy will be publicly available under the Freedom of Information Act 2000. It will be published on the Freedom of Information Internet site.

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7.6 Protective Marking

This policy has been assessed for its correct level of protective marking and is NOT PROTECTIVELY MARKED.

7.7 Health & Safety at Work

In the implementation of this policy consideration must be given to aspects of health and safety management contained within the Force H&S policy and H&S Manual, which set out the requirement for documented risk assessment by a competent person, when exposure to a particular hazard arising from the workplace or pre-planned policing work activity can be said to be reasonably foreseeable.

There are a number of Health and Safety issues connected with this policy, including: -

- The need for supervisors to monitor their staff and minimise potential for harm and/or injury.
- The need for all personnel to comply with the contents of Force H&S policies, risk assessments and safe working practices.
- The need for the reporting of all adverse safety incidents using the electronic PER 10 reporting system (report forms available from: Word/General Templates Folder).

8.0 Monitoring and Review

8.1 Links to Best Value/PPAF/Priorities/Performance Indicators

This policy does not contribute to any of the Force Strategic Objectives.

8.2 Review Process

The policy document will be reviewed annually by Head of HR.

The review will take account of the following criteria:-

- changes in legislation
- Court rulings – Domestic, European and Human Rights
- Examples of good practice from other Forces or other organisations
- Changes in Home Office circulars
- Developments with ACPO Policy Unit
- Representations made by individuals and relevant agencies

FOR POLICY MANAGEMENT UNIT USE ONLY

Policy Authorisation

Policy signed off by:

Terri Teasdale 27-11-2007
Director of Resources: **Date:**

DRAFT

Hazardous Waste Management Standard Operating Procedure

This Policy defines the procedure for the identification and management of hazardous waste and waste disposal in the Thames Valley Police Area.

What is hazardous waste?

Hazardous waste is waste that may be **harmful** to human health or the environment.

The Hazardous Waste Regulations 2005 (HWR) and The List of Waste Regulations 2005 (LoWR) came into force on the 16th July 2005.

Certain activities within our organisation produce hazardous waste which is an absolute and must be dealt with in accordance with Regulations, namely vehicle workshops, scenes of crime and photographic laboratories. Other specific hazardous waste products are dealt with via a specialist contractor or by the supplier. These include fluorescent tubes, computer equipment, toners and inks. The majority of our office based activities produce hazardous waste in very small quantities, and consequently they are exempt from the requirements.

Under LoWR the types of waste which we are likely to have to dispose of are:

<ul style="list-style-type: none"> • Aerosols • Alkaline Batteries • Acid Descalers • Thinners • Oil tins • Adhesives • Fluorescent Tubes 	<ul style="list-style-type: none"> • Lead Acid Batteries • Ni-Cd Batteries • Photochemicals • Toners • Paints • Caustic soda • Televisions • Fridges 	<ul style="list-style-type: none"> • Lithium Batteries • NiMH Batteries • Solvents • Oil Filters • Cleaning Chemicals • Contaminated Rags • Computer Monitors • Animal Waste
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The HWR

Part 5 of the HWR requires premises in England and Wales where hazardous waste is produced or removed to be notified to the Environment Agency. Producers who fail to notify and who are not exempt commit an offence. Thames Valley Police have registered the following buildings (this registration is renewed annually by Procurement Department): -

- | | | |
|--|-------------------------------|-------------------------------|
| • HQ | • Abingdon | • Ascot |
| • Buckingham | • Bletchley | • Chesham |
| • Hypothication Dept,
Crouch St Banbury | • Chieveley Traffic Base | • Bicester |
| • Three Mile Cross Traffic
Base | • Didcot | • Bracknell |
| • Aylesbury | • Cowley | • CCTV Aylesbury |
| • Milton Keynes | • Banbury | • Amersham |
| • Windsor | • St Aldates | • Reading |
| • High Wycombe | • Maidenhead | • Slough |
| • Thame | • Lodden Valley | • Newbury |
| • Fountain Court | • Gerrards Cross | • Marlow |
| • Wallingford | • Henley | • Beaconsfield |
| • Waddeston | • Faringdon | • Langley |
| • Newport Pagnell | • Wantage | • Wolverton |
| • Witney | • Public Order, U.
Heyford | • TSU, Kidlington |
| • Wokingham | • Stokenchurch | • OHU, Lyne Rd,
Kidlington |
| | • Sulhamstead | • Woodstock |
| | | • Taplow Traffic Base |

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The Chiltern Transport Consortium has also registered all 5 of their workshops. Producers need to prove to their waste management contractors that the premises have a notification or are exempt, otherwise waste management companies may refuse to collect hazardous waste, since to do so would constitute an offence.

The environmental regulator tracks the movement of hazardous waste through a **consignment note** system. This ensures that waste is managed responsibly from where it is produced until it reaches an authorised recovery or disposal facility. Waste producers must keep consignment notes for **three years**.

Exempted Premises

Certain categories of premises are exempt from notifying the Agency if less than 200kg of hazardous waste is produced at that premises in any 12 month period. There is no limit to the number of consignments that can be made from the premises under this exemption, as long as the total amount produced in that year is less than 200kg. The exemption will only apply where the hazardous waste is removed from the premises either by a registered or exempted carrier. Offices are amongst those premises which can be exempted.

However, where these premises produce more than 200kg or are likely to in any year, the Agency must be notified immediately and before the limit is exceeded.

While the vast majority of TVP stations and offices will not produce 200Kgs of Hazardous Waste a year, consideration must be given to Property being seized or handed in to the Police.

The Environment Agency has confirmed that it is in order for hazardous waste to be transported by TVP from one of our business premises to another without a requirement for a Carriers licence.

Arrangements are in place, contractual or otherwise, as follows:

Clinical Waste. All clinical waste including sharps, which must be stored in an appropriate container, soiled clothing, disposable clothing etc. are collected periodically under contract. All clinical waste must be placed in a yellow clinical waste bag. Collections are made upon request within 36 working hours. Sharps bins and yellow bags will be replaced on a like for like basis.

Chemical Waste. Arrangements are in place for the safe collection and disposal of chemical waste generated at sites such as scientific support, photographic and print room.

Waste Oils, Filters, Car Batteries etc. All waste oils etc should be disposed of through Chiltern Transport Consortium who manage the contract for periodic collection and disposal.

Cannabis Factories. A call-off agreement is in place for the secure and legal disposal of all items connected with Cannabis factories.

Toner Cartridges, Batteries and Mobile Phones. Contracts/agreements are in place for these items to be collected for Recycling

Fridges, Freezers, TVs, Video Recorders and Microwaves. An agreement is in place for the safe disposal and recycling of these items. Contact the Procurement Department for guidance.

Ad-hoc Hazardous waste. All other types of waste that is identified as hazardous should be referred to the Procurement Department, who will invite quotes, and arrange for the collection and disposal accordingly.