

 West Mercia POLICE		POLICY
Security Classification	OFFICIAL	
Disclosable under Freedom of Information Act 2000	Yes	

POLICY TITLE	Waste Management
POLICY REFERENCE NUMBER	WMP133
Version	1.0

POLICY OWNERSHIP	
DIRECTORATE	BUSINESS SERVICES
BUSINESS AREA	BUSINESS SUPPORT

INITIAL IMPLEMENTATION DATE	January 2021
NEXT REVIEW DATE:	January 2022
RISK RATING	HIGH
EQUALITY ANALYSIS	LOW

West Mercia Police welcomes comments and suggestions from the public and staff about the contents and implementation of this policy. Please write e-mail contactus@westmercia.pnn.police.uk

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1.00 POLICY

1.01 Policy Statement

West Mercia Police has a long standing commitment to protecting the environmental agenda and recognise that their activities both operational and non-operational have an impact on the natural environment for the communities of Herefordshire, Shropshire and Worcestershire.

West Mercia Police has a responsibility to reduce the organisation's detrimental impact on the local environment by promoting environmental best practice and to exceed aspirations.

West Mercia Police will comply with all environmental legislation and regulations, and wherever practicable exceed the requirements of codes of practice and best practice provision.

Due to the diverse nature of activities carried out to "Protect People from Harm" a wide variety of wastes are produced and collected, ranging from general wastes and recyclable materials, through to special wastes. The Force has a duty to ensure that all of these wastes are disposed of responsibly, using approved registered waste contractors and waste streams.

The Police and Crime Commissioner for West Mercia Police has a duty to ensure value for money through purchase and contracts and every effort should be taken to seek value for money whilst improving or minimising the impact on the environment. However, it is recognised that in some areas of compliance with legislation and/or reaching higher standards in terms of improving the environmental impact this might increase costs or require prior investment.

West Mercia Police will adopt the principles of the "best practicable environmental option" in the delivery of their waste management services. The Force will apply a "waste hierarchical approach" to reduce, reuse, recycle and recover waste products in preference to the disposal of waste to landfill.

1.02 Compliance

The policy has been prepared taking into account existing environmental legislation and the working practices of the Force. New legislative requirements or changes in current legislation may necessitate a review of this policy.

1.03 The policies of West Mercia Police are intended to promote equality, eliminate unlawful discrimination and actively promote good relationships regardless of:

- Age
- Disability
- Gender Reassignment
- Race,
- Religion or Belief
- Sex
- Sexual Orientation

- Marriage & Civil Partnership
- Pregnancy & Maternity

1.04 This policy has been assessed as having a LOW potential impact using the equalities impact assessment template, by incorporating equality considerations into the policy process, has allowed the Force to identify any actual or potential equalities and reduce them as much as possible, by applying the policy differently or looking for alternatives.

1.05 Freedom of Information

On behalf of West Mercia Police and the Police & Crime Commissioner, the Business Services Department maintains a list of owned and leased property. Inappropriate disclosure of such information has the potential to undermine the effectiveness of the service in its provision of law enforcement and to jeopardise the Health & Safety of staff and the public. Disclosure of this detail will only be made to authorised personnel. (Freedom of Information Act 2000, sections 31 and 38).

2.00 POLICY OBJECTIVES & IMPLEMENTATION

Summary

This document outlines the policy for West Mercia Police to comply with all applicable environmental legislation. The procedures for this management are contained within Section 07.00.

West Mercia Police requires all staff, visitors, contractors and anyone else making use of its premises to comply with this policy and the Force Environmental Strategy & Sustainability Policy.

2.01 The policy objectives are:

- to ensure that waste management is performed in accordance with all waste legislative requirements, including the duty of care, and to plan for any future legislative changes and to mitigate their effects.
- to minimise waste generation at source and facilitate repair, reuse and recycling over the disposal of wastes, where it is cost effective to do so.
- to provide clearly defined roles and responsibilities to identify and co-ordinate each activity within the waste management chain.
- to promote environmental awareness in order to increase and encourage waste minimisation, reuse and recycling.
- to secure where possible revenue for recyclable material to reinvest into the expansion of recycling opportunities within the Force area.
- to ensure the safe handling and storage of wastes on force premises.
- to provide appropriate training for staff and other stakeholders on waste management issues.
- to promote industry waste management best practice.
- to appoint competent person(s) to provide waste management advice.
- to take action to prevent pollution of air, water and land by understanding legislation and by acting responsibly.
- to maintain adequate records and maintain a register and archiving of consignee note returns for 3 years

- 2.02 All members of West Mercia 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 the applicable environmental legislation.

- 2.03 Staff, 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 department 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 Force site or premises that could have an impact upon the environment.
- 2.04 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, NPAS helicopter refuelling tanks/bowsers, vehicle refuelling pumps, departments such as scientific support (fingerprints and photographic) scenes of crime, where chemicals and other hazardous substances are used.

Managers of these areas are to ensure adequate control measures are in place to reduce the potential for pollution through spillage or leakage. The Force Transport Department will manage the contract for the disposal of waste oils from the vehicle workshops.

Emergency measures such as the provision of spill kits in high-risk areas are to be planned and implemented. All incidents involving any kind of pollution are to be reported immediately to the Force Health & Safety Department and the PPL.

- 2.05 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, the Force could be prosecuted for any serious breach, additionally there is potential for civil litigation.

3.00 IMPLICATIONS OF THE POLICY

3.01 Legal

The legal basis for this policy is found in existing environmental legislation that includes the following:

- 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
- h) The Control of Asbestos Regulations 2012

Full details can be found in Section 6 Guidance.

3.02 Equality

The Force is committed to ensuring that service users and employees are not discriminated against because of any of the nine protected characteristics as defined in the Equalities Act 2010.

3.03 Financial

There are additional financial implications for the Police & Crime Commissioner of West Mercia Police in applying this policy. There is Investment in recycling stations, staff familiarisation, environmental training, however the organisation is required to meet government objectives for delivering environmental sustainability.

3.04 Staff / Training

To ensure the competency of the Business Services Department's representative to effectively manage the procedures of this policy and in respect to the management and implementation of this policy staff will be made aware of their responsibilities business leads will identify and coordinate any relevant training required via the Force Training & Development Department.

3.05 Bureaucracy

The minimal additional bureaucracy created by this policy is necessary to meet the Force responsibility to meet its environmental and social responsibilities.

4.00 CONSULTATION

The draft policy was circulated for consultation, prior to consideration by the Joint Negotiating Consultative Committee (JNCC).

Consultation included all interested groups which consisted of 32 individual members of staff, of which 10 responded, their comments were addressed and where appropriate included in the policy.

<i>Business Lead Consulted</i>	<i>Date Consulted</i>
Helen Danks	January 2021

5.00 DOCUMENT HISTORY

5.01 The policy will be subject of regular review.

5.02 The history of the policy will be recorded using the chart below:

Date	Author / Reviewer	Amendment(s) & Rationale	Approval / Adoption
		Previously approved at JNCC meeting	JNCC 02/04/2015
Nov 2020	Helen Danks	Reviewed –minor changes to the Strategic Estates Manager, reverted to West Mercia Policy	Jan 2021

6.00 GUIDANCE

- 6.01 Guidance on legislation and all types of waste is available from PPL, including the current edition of the Register of Environmental Legislation and Other Regulations, please follow [link](#).

7.00 Management Responsibility

The Office of the Police and Crime Commissioner for West Mercia Police – will delegate to the Director of Business Services the overall responsibility to ensure that this policy is implemented and that appropriate funding is made available.

7.01 Director of Business Services

The Chief Officer with functional responsibilities for estates, building matters and staff training.

7.02 Strategic Estates Manager, Head of Service (Business Operations, Head of Forensic Services, Head of Digital Services, & the Head of Commercial) and PPL as the Property and FM service provider

- Implementation of Force policy and procedures.
- Provision of adequate resources for training.
- Provide advice and guidance to Service Delivery Managers as appropriate and as requested.
- Ensure the Environmental Strategy & Sustainability policy is incorporated into relevant contracts.
- Will ensure the implementation of the policy where applicable, through PPL

7.03 Operational Chief Police Officers, Departmental Heads, Service Delivery Managers.

- Implementation of Force policy and procedures.

7.04 PPL & Head of Business Operations

- PPL & Head of Business Operations will implement auditing and monitoring of action plans.
- PPL & Head of Business Operations will identify a strategic communication strategy to ensure all members of staff are aware of the aspirations of the policy.
- PPL and the Head of Business Operations will ensure that departments can demonstrate compliance.

7.05 Service Delivery Managers

- To support PPL with environmental waste management issues, this will include carrying out of internal audits.
- Ensuring contractors are advised that they must comply with the Duty of Care; that they comply with the Force Waste Management Policy; or satisfy the Force that their own procedures will achieve legal compliance.
- Overseeing the day to day delivery of general waste and recycling services. Liaising with Health & Safety and PPL to establish procedures for managing waste of Force premises.
- Compiling and holding annual Waste Transfer Notes for managed waste and recycling collections.
- Compiling waste data and statistics to enable annual benchmarking against Environmental Performance Indicators.
- To complete annual audits on the Force waste contractors and assessing the due diligence of their disposal practices.

7.06 Heads of Service (*Responsible for*)

- **Non-hazardous Wastes** – ensuring that no hazardous waste is disposed of through the general waste or recycling streams.
- **Hazardous Wastes** – Nominating a “responsible person” within the business area to coordinate waste disposal for any hazardous or clinical wastes.
- Informing Health & Safety and the Environmental & Sustainability Officer who the nominated “responsible person” is and updating them if and when the “responsible person” changes.

7.07 Nominated Responsible Person (*Responsible for*)

- Signing all departmental / business area Waste Transfer Notes
- Establishing and maintaining a record keeping system in order that the movements of all wastes can be tracked.
- Make these records available for audit.
- Supplying information and paperwork on all wastes disposed of when it is requested.
- Attend appropriate training.

7.08 Contractors and Suppliers

- Disposing of waste responsibly, through the appropriate waste stream. This must be either in accordance with Force policy and procedures, or through a scheme approved by the Force. Copies of waste transfer notes must be made available to the Force.

Appendix A: GLOSSARY

1.00 The Police & Crime Commissioner

A legal entity, enabled to contract with other legal entities. Owns and maintains all property used by West Mercia Police.

The Police & Crime Commissioner for West Mercia Police has a portfolio of approximately 116 assets from which it delivers policing services to the communities of Herefordshire, Shropshire and Worcestershire.

2.00 The Force

West Mercia Police

West Mercia Police covers the 2,868 square miles of Herefordshire, Shropshire and Worcestershire. It serves a population of 1.2 million and employs 2066 Police Officers, 352 Specials and 1830 Police Staff (which includes 245 Community Support Officers).

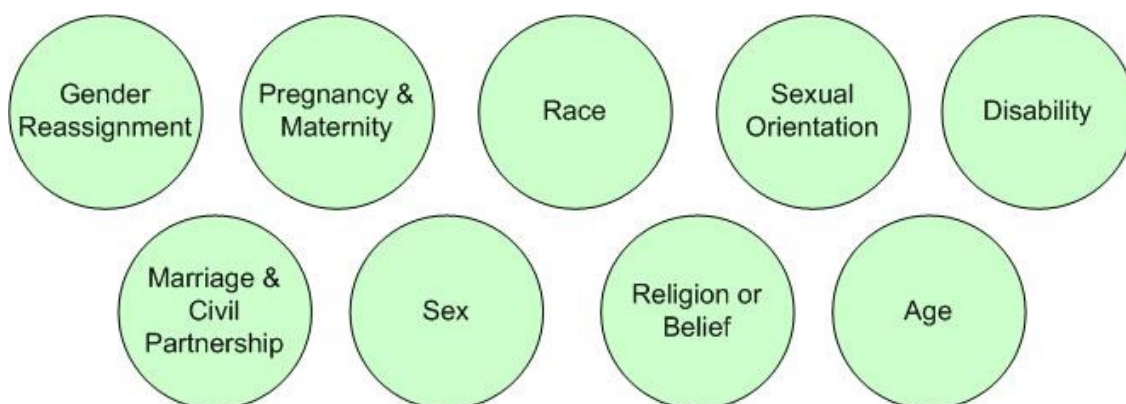
3.00 Contractor

Any person or undertaking or other legal entity entering into; or involved with a contract with the organisation for the supply of goods or services, including sub contractors (hereafter called contractors) and staff employed by the Force carrying out construction work.

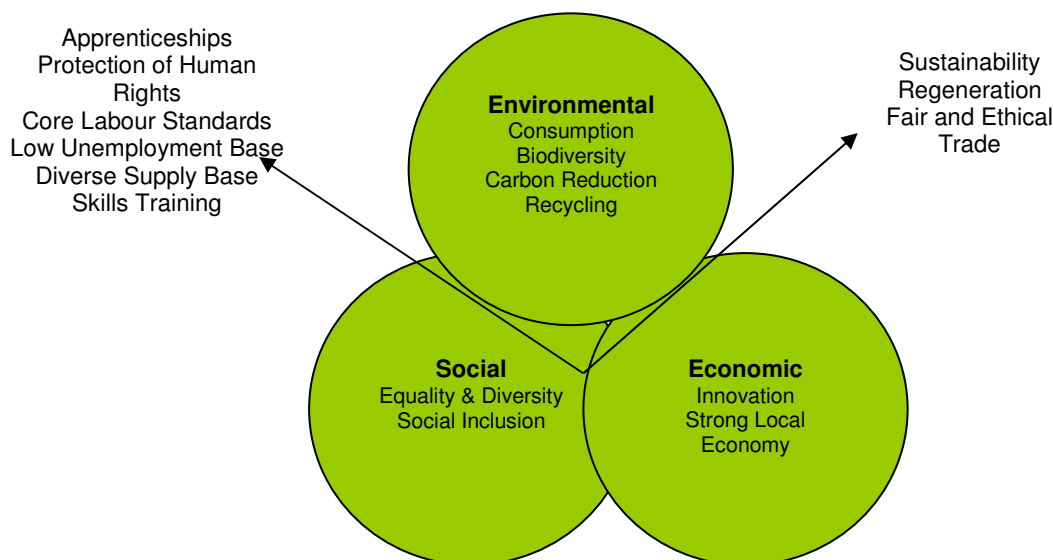
4.00 Staff / Volunteers

Any person employed by the PCC / Force or its contractors
Any person not specifically referred to above

5.00 The Equalities Act 2010 – The nine defined protected characteristics:



6.00 Sustainable Commissioning and Procurement.

The Three Aspects of Sustainable Commissioning and Procurement.

Sustainable Procurement is “a process whereby the organisation meet their needs for goods, services, works and utilities in a way that achieves value for money on a whole life basis in terms of generating benefits to society and the economy, whilst minimising damage to the environment”.

7.00 Hazardous Waste – These are the most dangerous wastes as they can cause the greatest environmental damage or are dangerous to human health. These wastes are listed in The List of Wastes (England) Regulations 2005. Some common hazardous wastes are listed below:

Acids	Pesticides	Fluorescent Tubes
Alkaline Solutions	Photographic Chemicals	Televisions
Batteries	Waste Oils	Paint
Solvents	Computer Monitors	

Other hazardous wastes, such as asbestos and radioactive substances, are subject to their own specific legislation.

8.00 Clinical Waste – Any waste consists of or partly of:

Human or animal tissue	blood or other body fluids	excretions
Drugs or other pharmaceutical products other than controlled or cytotoxic drugs		
Swabs or dressings	Syringes, needles or other sharp instruments.	

Clinical Waste which unless rendered safe, may prove hazardous to any person coming into contact with it. It also includes any other waste arising from medical, nursing, dental, veterinary, pharmaceutical or similar practice, investigation, treatment, care, teaching or research, or the collection of blood for transfusion, being waste which may cause infection to any person coming into contact with it.

9.00 Environmental Protection Act 1990 (EPA 1990)

This is the single most important piece of environmental legislation and it controls many aspects of how the environment is protected and regulated. The EPA 190 (amended 1995) provides the main statutory framework in relation to waste.

The majority of waste leaving Force premises is controlled waste.

This is described in the EPA 1990 as the waste arising from household, commercial or industrial premises. Controlled waste includes waste from offices, food handling, shops and other domestic activities.

EPA 1990 Section 34 imposes “Duty of Care” on producers and handlers of waste, “to take reasonable measures to prevent unauthorised deposit, treatment or disposal of waste”. This means the following:

- a) The Force must keep records of how much waste it is generating.
- b) The Force must ensure that a registered carrier collects its waste.
- c) The Force must ensure that all transfer notes are completed and filed detailing the type of waste for disposal. These must be kept for three years.
- d) Ensure that all waste is dealt with in accordance with the “Duty of Care”

Breach of the Duty of Care is a criminal offence and can incur penalties of up to £20,000 or an unlimited fine if convicted on indictment.

Appendix B: WASTE HIERARCHY