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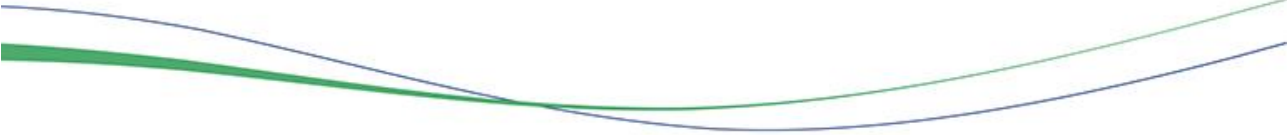
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# INTEGRATED MANAGEMENT SYSTEM MANUAL

Doc Ref: SHE-SHEQ-IMS-MAN-v3





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## 1.0 QUALITY, HEALTH AND SAFETY AND ENVIRONMENTAL MANAGEMENT SYSTEMS

This integrated management system is intended to meet the requirements of ISO 9001:2008, ISO 14001:2004 and OHSAS 18001:2007 (the Standards). It has been prepared to describe and reference the systems and processes adopted by Celtic Recycling Limited throughout its business.

### 1.1 INTRODUCTION

Established in 1992 to cater specifically for electricity industry waste management, Celtic Recycling Limited (CRL) operates nationally, with waste operations at Pyle and Newport in South Wales and Barnsley, South Yorkshire.

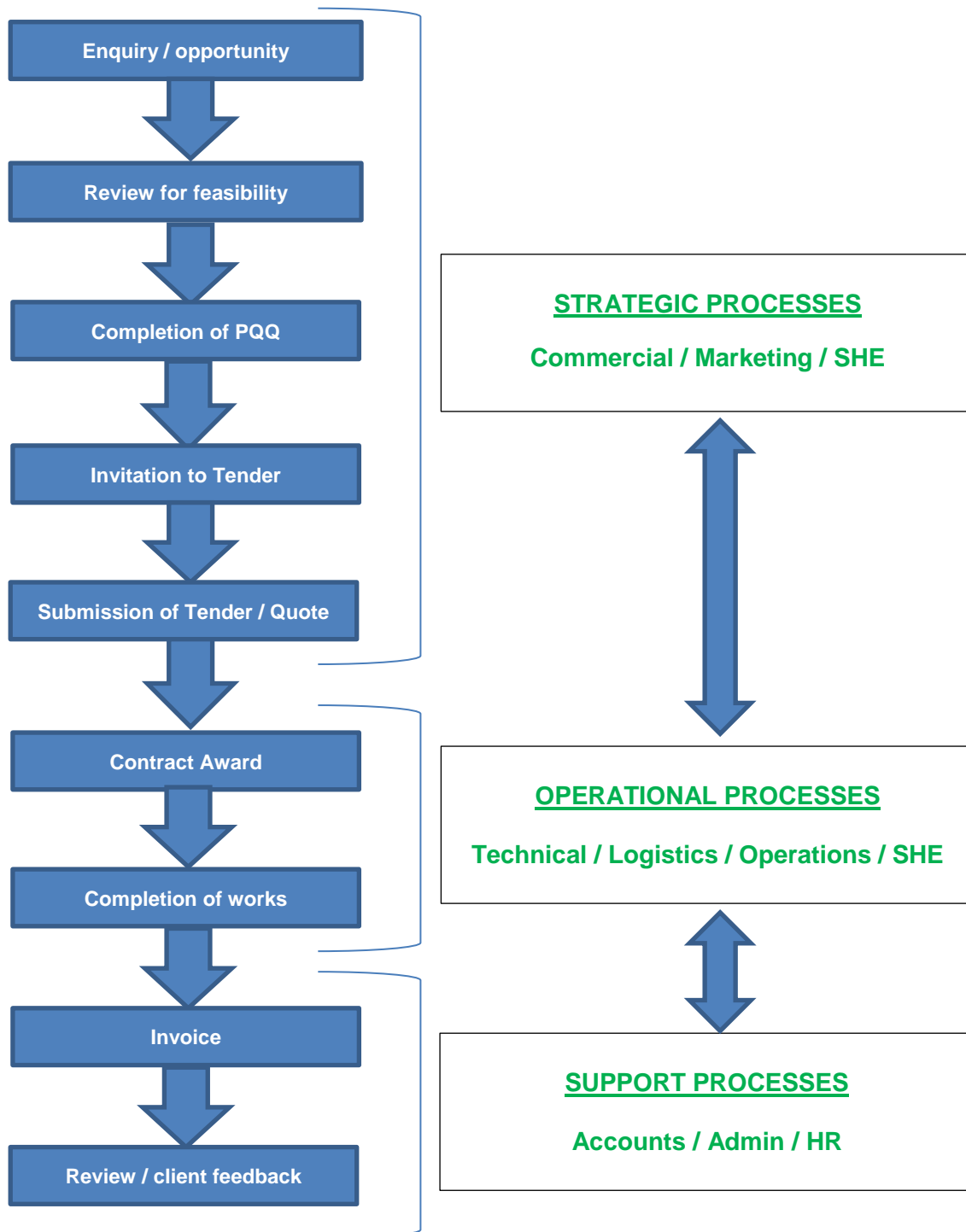
CRL has achieved UKAS accredited certification of the Standards. As approved supplier to the utilities industry under the Achilles independent supplier management programme, the company holds the associated UVDB 'Verified' status as well as being certified under the CEMARS scheme (Carbon & Energy Measurement and Reduction Scheme).

### 1.2 SCOPE OF SERVICES

The company provide specialist services for the dismantling, recovery, recycling and / or disposal of redundant electrical equipment and associated materials



**Figure 1: Business Management System**





### 1.3 MANAGEMENT SYSTEM

The CRL integrated management system (IMS) has been developed to comply with the Standards. The manual describes the processes within the management system and how they interact.

The system is made up of 3 levels of documentation, prepared to describe the management of various quality, health, safety and environmental issues that require specific monitoring and control.

#### Level 1

This manual is the first level of the (IMS) and describes the way in which quality, health and safety and environmental policies are implemented, managed and maintained within the company.

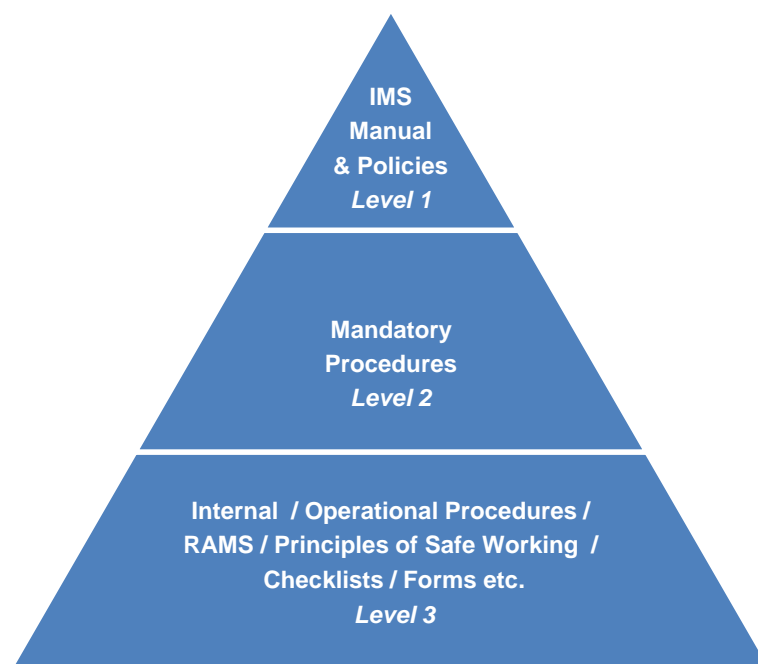
#### Level 2

The second level of documentation consists of mandatory procedures specifically required by the Standards; or identified as required due to the nature of their subject matter. These procedures form the basis of how the management system has been implemented.

#### Level 3

The third level includes internal / departmental or site specific processes including risk assessments, method statements, principles of safe working, emergency procedures, checklists, forms etc.

**Figure 2: Management System Hierarchy**





## 2.0 DOCUMENT CONTROL

In order to ensure the effective management of documents, CRL has developed a '*Document Control Procedure*' which describes the way in which company documents are prepared, authorised, issued and modified.

## 2.1 COMPANY POLICIES

The CRL senior management team has developed documented policy statements, authorised by the Managing Director to set the vision for the management system and company commitments relating to quality, health and safety and environment performance.

The policies are communicated to all employees and any person(s) working on behalf of the organisation such as suppliers and contractors. The policies are prominently displayed within all company offices and facilities, as well as remote / client sites at which CRL are operating and will be made available to interested parties, including members of the public on request.

The quality, health and safety and environmental policies are subject to annual review unless there are any significant changes which impact on the content of the policy(s) for example, new legislation or changes to CRL activity etc.

## 2.2 PROCEDURES AND KEY PROCESSES

Procedures have been developed in line with the requirements of the Standards and include all of the mandatory procedures identified within these management system standards.

Key processes have been established to maintain compliance of legal obligations and ensure the satisfactory delivery of customer requirements.

## 2.3 DOCUMENT REFERENCING

Documentation within the management system has been referenced to ensure that only current versions of system documents are utilised. A '*Document Control Procedure*' has been established to define how changes, approval and the issue of documentation within the CRL IMS are controlled.

## 2.4 CONTROL OF RECORDS

In order to demonstrate compliance to the management system standards, CRL has established a '*Control of Records Procedure*' for identifying and maintaining records relating to the IMS. The procedure lists the records kept to demonstrate compliance of customer requirements, standards, legal and other IMS requirements. Any records associated with legal requirements with specific retention times, or assignment of responsible persons is detailed within this procedure.





### 3.0 MANAGEMENT RESPONSIBILITY

The responsibility for management of CRL has been identified and documented; the following sections of the manual describe how the organisation demonstrates these responsibilities.

#### 3.1 MANAGEMENT COMMITMENT

CRL senior management hold a duty of care to its employees, customers and the environment.

This is demonstrated through commitment to the management system, by developing quality, health and safety and environmental policy statements and supporting the preparation of this management system documentation to comply with the Standards and providing resources to implement, administer and operate within its requirements.

Senior management have identified roles and responsibilities for the implementation and delivery of the management system. These responsibilities have been communicated company-wide, with training being provided as necessary to enable employees to carry out their roles effectively.

#### 3.2 CUSTOMER FOCUS

Senior management have made a commitment to focus on customer requirements, corporate responsibility and the delivery of products and services compliant with the pre-requisites of the customer and statutory and regulatory obligations; this is demonstrated throughout the manual.

CRL have assessed the business requirements to ensure the delivery of customer requirements whilst remaining focused on the company corporate responsibilities to the environment and its employees, this is demonstrated in the objectives set to deliver continual improvement in the areas of social and environmental sustainability.

#### 3.3 HAZARD IDENTIFICATION, RISK ASSESSMENTS AND ENVIRONMENTAL ASPECTS ASSESSMENT

The company has made a commitment to prevent pollution of the environment, as well as injury and ill health to employees. These responsibilities are fundamental to the success of the business and the delivery of customer focused commitments.

CRL has developed a system to identify hazards relating to activities that could cause injury or ill health. A '*Hazard Identification and Risk Assessment Procedure*' has been established to document the methods adopted to conduct and prepare risk assessment documentation.







A system has also been developed to identify environmental aspects relating to CRL activities, products and services. The '*Environmental Aspects Assessment Procedure*' describes the methods used to identify environmental aspects and assess their impact on the environment.

These procedures are utilised to ensure the organisation can identify and manage the risks referred to by these assessments and to record the relevant control measures implemented by the business, to ensure adherence to the requirements of the IMS.

### 3.4 LEGAL AND OTHER REQUIREMENTS / EVALUATION OF COMPLIANCE

To support commitments with the associated IMS policy statements, CRL identifies relevant health, safety and environmental legislation and other statutory obligations applicable to CRL and its customers.

A documented '*Legal and Other Requirements Procedure*' has been established to describe how legal and other requirements are identified, reviewed and communicated within the organisation and to any other relevant interested parties.

The procedure also includes the methods adopted to evaluate compliance to legal requirements and other requirements, to which the company subscribes.

### 3.5 RESPONSIBILITIES AND AUTHORITY

The business is structured to provide an effective means of delivering customer requirements whilst safe guarding the health and safety of employees and the environment, ensuring that CRL business objectives are accomplished.

#### Managing Director

The Managing Director and senior management team are dedicated to providing employees, with the necessary resources required to enable them to undertake their responsibilities. These resources include human resources, training, technological and financial.

The Managing Director has ultimate authority and responsibility for quality, health and safety and environment, ensuring that the requirements of the management system are implemented and maintained.

The Managing Director is also the management appointee, for occupational health and safety as required by the OHSAS 18001 standard. In conjunction with support from the management representative and site managers, the Managing Director will ensure that all employees understand the commitments made, in the associated IMS policy statements.

The Managing Director will provide support and resource to ensure that the management system is adequately implemented and maintained, and is also responsible for the assignment of labour, resources and support to ensure compliance of the management system.







## SHE Manager

The SHE Manager is responsible for relaying the importance of the management system to all staff, to obtain their support.

The SHE Manager will use the support of individual representatives for quality, health and safety and environmental management systems to ensure IMS is implemented and maintained.

The SHE Manager has responsibility for the following:

- Ensuring the establishment and implementation of the IMS and monitoring its performance;
- Monitoring the maintenance of the documented IMS;
- Ensuring the resources necessary to deliver the requirements of the management systems are available;
- Supporting the planning and implementation of improvement objectives;
- Providing leadership in the continual improvement requirements for quality, health and safety and environment;
- Development and management of the IMS internal audit programme;
- Monitoring and measurement of quality, health and safety and environment performance;
- Supporting company employees with the implementation of the management system;
- Updating and maintaining the management system documentation;
- Ensuring health, safety and environmental information is provided for senior management meetings that address IMS management review agenda points;
- Communicating health, safety and environment management system issues to directors and employees;
- Informing appropriate staff of health, safety and environmental legislative updates and other changes that may affect the management system;
- Supervising the delegation of SHE management system responsibilities;
- Ensuring appropriate SHE management system records are maintained;
- Ensuring the management of objectives, targets, KPIs are captured within the management system and are regularly reviewed;
- Overseeing the communication of internal and external health, safety and environmental issues;
- Advising on training programmes;
- Responsibility for ensuring that the internal audit programme is up to date and actions closed out;
- Ensuring applicable health, safety and environmental legislation is identified and assessed to include the undertaking of legal compliance audits (both company and site specific);
- Ensuring appropriate corrective and preventative actions are implemented.





Despite a management representative being appointed within the business, the responsibility for the preparation and maintenance of the IMS compliant with the Standards belongs to all employees.

The CRL competent persons in occupational health and safety management has been identified within the business, as well as the use of external consultants as and when required, in order to ensure all sites and business areas remain compliant.

### 3.6 QUALITY, HEALTH AND SAFETY AND ENVIRONMENTAL OBJECTIVES

Having made a commitment to continual improvement, CRL will set objectives to improve performance in relation to quality, health and safety and environment.

Specific, measurable, achievable, realistic, timely (SMART) objectives and targets for improvement are set during the monthly management review process, based on the organisation's quality performance, significant environmental aspects and health and safety risks and the regulatory requirements identified in the legal register.

When determining these SMART objectives and targets, due consideration is given to financial and operational plans, annual business plans, current compliance, applicable legislation and the views of interested parties.

Typical objectives include, but are not limited to the following:

#### Quality performance

- Collection and processing customer specification on time;
- Delivering customer requirements 'right first time';
- Providing a first class service to ensure on-going customer satisfaction.

#### Health and safety performance

- Promote zero injury incidents in the workplace;
- Provide safe, healthy working conditions for employees, contractors and visitors to company sites;
- Ensure adequate documentation to control operational activities and ensure compliance to legal obligations.

#### Environmental performance

- Full compliance with environmental site permits;
- Prevention of unnecessary adverse environmental incidents as a result of CRL activities both locally and globally;
- Promoting the use of sustainable materials and services;
- Reduction in waste generation and diversion of waste from landfill;
- Identification and implementation of reductions in carbon footprint, before and during product and service delivery.





### 3.7 QUALITY PLANS, HEALTH AND SAFETY AND ENVIRONMENTAL PROGRAMMES

Quality, health and safety and environmental objectives and targets are achieved, where appropriate through the development and implementation of programmes that detail the following:

- Actions to be taken;
- Person or persons responsible for their implementation and operation;
- Timescales for their achievement.

The improvement objectives are developed from the identified significant environmental aspects and significant risks. Other elements utilised in the setting of objective include audit results, non-conformities and legal compliance evaluations.

Where possible, objectives will be measurable and will be reviewed regularly to ensure they are kept on track to achieve the required targets and goals. The managing director will be informed if objectives are unlikely to be achieved, in order for a review of their status to be conducted to ascertain whether support can be provided to rectify any issues.

### 3.8 MANAGEMENT REVIEW

It is the responsibility of the management team to periodically review the effectiveness and relevance of the management system. This will be achieved through periodic management review meetings.

The elements covered at the management review meetings are as detailed below:

1. Review of previous minutes and approval of previous management review minutes;
2. Planning / results / findings of internal audits
3. Non-conformance, preventive and corrective action update
4. Health, safety and environmental performance;
5. Review of sub-contractor performance appraisals
6. Quality performance / customer satisfaction results;
7. Status of business objectives and targets;
8. Review of any changing circumstances including communication from interested parties (legislation, business, structure, aspects and impacts etc.);
9. Legal and other requirements compliance evaluations;
10. Review of resources to support the management system.
11. A.O.B

From these elements, a conclusion will be made as to the suitability and effectiveness of the management system.

Any suggestions for changes and improvements to the management system form an action plan to facilitate achieving any required improvements.





## 4.0 PROVISION OF RESOURCES

Adequate resources are provided to ensure that CRL can effectively meet the requirements of this management system, customer requirements, legal and other requirements to which the company subscribes. Resources are reviewed on a regular basis and an assessment of any requirements identified made. If deemed that resources are inadequate, recruitment or redeployment may occur depending on the needs of the business.

CRL management ensure adequate personnel are available to support the management systems and deliver policy commitments.

This is achieved through the strategic employment of permanent staff, supported by sub-contractors as and when required, in order to ensure that the company maintains suitable resources to meet this objective.

## 4.1 TRAINING, COMPETENCE AND AWARENESS

In order to ensure that employees conduct tasks assigned to them in a sustainable and safe manner ensuring continued compliance to customer requirements, relevant information, instruction and training is provided, to ensure that they are fully competent i.e. possess the required skills, knowledge, qualification or capacity to successfully and efficiently conduct their role within the business.

All CRL employees receive quality, health and safety and environmental awareness as part of the CRL induction programme.

Records demonstrating the competence of employees are available for review as part of the CRL personnel filing system and are also available electronically, on the company SharePoint system. A 'Training, Competence and Awareness Procedure' has been developed which fully documents the methods adopted by CRL.

## 4.2 EQUIPMENT AND INFRASTRUCTURE

Senior management assess infrastructure and staffing requirements in accordance with business demands and financial constraints. The condition of equipment and infrastructure is reviewed on a regular basis and assessed during internal audits.

Future demand trends and technological requirements are taken into account to establish infrastructure requirements. The infrastructure of the premises are maintained by CRL and maintenance systems are in place to provide a safe place of work, that is designed to be fit for the purpose intended.

All equipment with potential safety or environmental risk is closely scrutinised and subject to safety and/or an environmental impact risk assessment, in order to identify any potential hazards and ensure controls are put in place to minimise the risks.





### 4.3 WORK ENVIRONMENT

The work environment provided by CRL whether at offices, facilities or remote/client sites will be subject to relevant legislation and best practice guidance.

Welfare facilities will be made available to ensure that employees are comfortable and relevant parameters such as temperature and lighting are adequately controlled.

Relevant site welfare facilities will be identified in site specific documentation and the health and safety policy arrangements.

### 4.4 COMMUNICATIONS, CONSULTATION AND PARTICIPATION

Internal and external communication channels have been established within CRL. Quality, health and safety and environmental matters are communicated regularly, during periodic meetings and through toolbox talks.

A documented '*Consultation, Communications, and Participation Procedure*' has been established, to describe how CRL has developed management systems to ensure compliance with these requirements.

### 5.0 PRODUCT REALISATION

Included in this section of the manual is a description of the realisation process adopted by the business. It describes the processes adopted by the company, from planning through to invoicing, and the way in which CRL delivers customer requirements and achieves customer satisfaction.

### 5.1 OPPORTUNITIES, TENDERS AND PROPOSALS

Prior to work being sought or accepted, a process review of customer requirements is undertaken. The extent of the review is based on the value of the work being considered as well as business risks from a quality, health and safety and environmental perspective.

In compliance with its commitment to achieving customer satisfaction the company will ensure that delivery within the relevant timescales and budgets provided is achievable.

Tenders or proposals detailing service levels and pricing can be developed where additional services are to be offered, or where the scale of the business requires it. Where required the management will fully establish the customer requirements and develop proposals to meet the requirements of the activities.

CRL may establish contracts with some customers, either to provide specialist recovery, management and recycling services. In all cases, the customer requirements are identified and tenders and/or proposals developed. Upon receipt of notification of acceptance of CRL tender / proposal and/or quotation, site specific RAMS are prepared for approval by the customer prior to commencement of the work.





The CRL '*Opportunity Handling and Planning Procedure*' demonstrates how the organisation identifies opportunities, assesses customer requirements and prepares tenders and / or proposals for submission to customers.

## 5.2 OPERATIONAL CONTROL

Once formal communication of work being assigned to CRL is received, a pre-start phase is documented to describe the planning that will take place, prior to the service delivery. There is a need to ensure that the organisation can provide the customer requirements including labour, equipment and documentation.

Documentation requirements may include risk assessments, method statements, project plans, programme of works and relevant records to demonstrate compliance to customer requirements as well as any legal requirements applicable to the site activities. A documented planning procedure has been developed to describe how work is planned prior to service delivery.

CRL has developed procedures to describe methods for achieving customer requirements during the delivery stages; these are referenced as Principles of Safe Working (PSW's); Policy Support Documents (PSD's) and Risk Assessment and Method Statements (RAMS) to effectively manage quality, health and safety and environmental issues whilst operations are being conducted.

The '*Opportunity Handling and Planning Procedure*' also documents procedures to describe how site work is monitored and controlled to ensure that site specific requirements are adhered to.

Any deviation from these will be identified by the Project/Site Manager in the site specific method statement and agreed with the customer prior to implementation, ensuring no deviation is agreed that presents uncontrolled risks, impacts or legal non-compliance.

## 5.3 PURCHASING

Purchasing within CRL is a formal process with controls to ensure that outsourced items / services meet the requirements specified by the business / customer.

CRL will create official orders to suppliers / sub-contractors / contractors to specify materials / services required. A documented '*Sub-contractor Approval and Management Procedure*' has been established to identify how CRL approves sub-contractors / suppliers for procurement and continually evaluates their performance to ensure continued suitable service delivery.

## 5.4 CUSTOMER PROPERTY / PREMISES

Employees required to visit / work on customer property / premises are required to adhere to the '*Employee Code of Conduct*' which documents CRL expectations regarding personal conduct, the manner in which business activities are undertaken and respecting the customer's property / premises. Any materials chosen or provided by the customer will be stored as specified and agreed with the customer and securely managed to avoid loss, theft or damage.







## 5.5 EMERGENCY PREPAREDNESS

CRL has identified several areas for potential emergency scenarios within the business operations. These could include fire, pollution e.g. spillage, major injury, bomb scare, terrorist threats or floods (although this is not an exhaustive list).

Procedures have been put in place within the management system to ensure emergencies that may occur are adequately managed. An *'Emergency Preparedness Procedure'* has been developed to demonstrate how emergencies are reported, managed, investigated and how these arrangements are tested.

Emergency procedures include arrangements for spillages, first aid, competent fire personnel and other key roles within emergency incidents.

## 6.0 MEASUREMENT ANALYSIS AND IMPROVEMENT

To facilitate continual improvement within the business, CRL continually monitor and measure the quality, health and safety and environmental performance of the business against pre-set annual business objectives and targets. The *'Performance Monitoring and Measurement Procedure'* documents the way in which CRL reviews performance against set objectives and targets and the programmes implemented, in order to assist the process of continuous improvement.

### 6.1 CUSTOMER FEEDBACK

Methods utilised to determine customer satisfaction include complaints, compliments, and comments made by customers by email or during meeting etc. Customer recommendations, referrals and repeat work are also used to benchmark client satisfaction. A customer satisfaction survey is sent to the client following completion of a project/works to determine the status of the customer's perception of CRL's performance and service delivery.

Completed surveys are copied to the managing director and operations director for review upon receipt, scanned and recorded on a quality database. Any negative responses/comments are investigated and if applicable measures put in place to avoid future reoccurrences which is fed back to the client.

### 6.2 INTERNAL AUDIT

A documented process based *'Internal Audit Procedure'* has been established to identify the methods for the annual programming for planning and conducting audits of quality, health and safety and environment for each aspect of operations.

Each process within the IMS will be audited at least once every 3 years (at a minimum).







### 6.3 PERFORMANCE MONITORING AND MEASUREMENT

Process performances are measured by monitoring parameters such as customer satisfaction rates, health and safety performance and environmental impacts. KPIs are established to ensure performance is delivered on a planned basis.

A '*Performance Monitoring and Measurement Procedure*' has been developed to describe how CRL monitors and measures various parameters of performance and the actions taken to ensure continual improvement. KPIs include those related to the aforementioned objectives and capture quality, occupational health and safety and environmental measures.

### 6.4 INCIDENTS, NON-CONFORMANCE, CORRECTIVE AND PREVENTIVE ACTIONS

Key to the success of the CRL IMS is that all quality, health and safety and environmental deficiencies are recorded, investigated and resolved.

The documented '*Incidents, Non-conformance, Corrective and Preventive Action Procedure*' has been established for defining responsibility and authority for handling and investigating non-conformance, for issuing non-conformity notices and for implementing corrective and preventive actions.

Incidents could include, but are not restricted to:

- Customer complaints
- Injuries to employees and contractors
- Environmental incidents
- Legal breaches
- Emergency incidents e.g. fires, pollution etc.

Records of incidents, non-conformance and corrective preventive actions are kept in accordance with the '*Control of Records Procedure*'.

### 6.5 CONTINUAL IMPROVEMENT

Progress towards the achievement of quality, health and safety and environmental objectives is measured against plans. Where progress is below target, steps are taken to facilitate improvement.

Through internal audits, corrective and preventative action and process monitoring; CRL management identify steps to support the achievement of specified quality objectives. Progress towards quality objectives is monitored and management action taken as and when required in order to maintain progress.

It is a basic principle of the quality policy and system that CRL will seek to continually improve customer service. Therefore, quality service objectives are reviewed annually taking into consideration customer expectations based on feedback received via the customer satisfaction survey and market trends.





### Additional information and conditions for reassessment

This manual will be reviewed annually unless there are any significant changes which would indicate that it is no longer suitable and sufficient.

Should this occur, an immediate review will be undertaken and appropriate actions identified and implemented to ensure that effective procedures are in place at all times.

ASSESSED BY	SIGNATURE	DATE
Robert Gunter Quality and Environmental Advisor		28 October 2016
REVIEWED BY	SIGNATURE	APPROVED DATE
Kevin Stevens Health, Safety & Environmental Manager		31 October 2016
		DATE OF NEXT REVIEW
		30 October 2017

