



Environmental Management System Handbook

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Table of Contents

1. Amendment Record	4
2. Definitions	5
3. Introduction	7
4. Context of the Organisation.....	7
4.1 Understanding the Organisation and its Context	7
4.2 Needs and Expectations of Interested Parties	7
4.3 System Scope	8
5. Leadership.....	10
5.1 Leadership and Commitment	10
5.2 Environmental Policy	11
5.3 Roles, Responsibilities, and Authorities.....	11
6. Planning.....	15
6.1 Actions to Address Risks and Opportunities	15
6.1.1 Environmental Aspects	15
6.1.2 Compliance Obligations	18
6.1.3 Planning Action	19
6.2 Environmental Objectives and Planning Action	19
7. Support.....	20
7.1 Resources	20
7.2 & 7.3 Competence and Awareness	20
7.4 Communication	22
7.5 Documented Information	24
8. Operation.....	27
8.1 Operational Planning and Control.....	27
8.2 Emergency Preparedness and Response	28
8.3 Emergency Spill Response.....	30
9. Performance Evaluation	32
9.1 Monitoring, Measuring, Analysis and Evaluation	32
9.1.1 Evaluation of Compliance	32
9.2 Internal Audit	33
9.3 Management Review	34
10. Improvement.....	35
10.1 General	35
10.2 Non-Conformity and Corrective Action.....	35

10.3	Continual Improvement.....	37
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1. Amendment Record

Version Number	Date	Sections Updated	New Version	Originated By	Comments

2. Definitions

Audit – Systematic, independent and documented process of obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.

Compliance Obligation – Legal requirement that an organisation must comply with and other requirements that an organisation chooses to comply with.

Corrective Action – Action to eliminate the cause of a non-conformity and to prevent recurrence.

Documented Information – Information required to be controlled and maintained by an organisation and the medium on which it is contained.

Effectiveness – Extend to which planned activities are realised and planned results achieved.

Environmental Aspect – Element of an organisation's activities or products or services that interacts or can interact with the environment.

Environmental Impact – change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects.

Environmental Information Act (EIR) – Legislation governing the release of public sector information relating to the environment. Environmental information includes information about air, water, soil, land, wildlife, energy, noise, waste, transport, and emissions. Environmental information also includes information about decisions, policies, and activities that affect the environment.

Environmental Objective – Result to be achieved, set by the organisation, consistent with its environmental policy.

Environmental Performance – Measurable result related to the management of environmental aspects.



Environmental Policy – Intentions and direction of an organisation related to environmental performance, as formally expressed in its top management.

Freedom of Information Act (FOI) – Legislation governing the release of sector information.

Indicator – Measurable representation of the condition or status of operations, management or conditions.

Interested Party – Person or organisation that can affect, be affected by, or perceive itself to be affected by decision or activity.

Life Cycle – Consecutive and interlinked stages of a product (or service) system, from raw material acquisition or generation from natural resources to final disposal.

Measurement – Process to determine a value.

Monitoring – Determining the status of a system, a process or an activity.

Non-Conformity – Non-fulfilment of a requirement of the Standard (need or expectation that is stated, generally implied or obligatory).

Outsource – Make an arrangement where an external organisation performs part of an organisation's function or process.

Prevention of Pollution – Use of processes, practices, techniques, materials, products, services, or energy to avoid, reduce, or control the creation, emissions, or discharge of any type of pollutant incident, in order to reduce adverse environmental impacts.

Risk and Opportunities – Potential adverse effects (threats) and potential beneficial effects (opportunities).

Top Management – Person or group of people who directs and controls an organisation at the highest level.

3. Introduction

Nottingham Trent Students' Union operates an Environmental Management System (EMS) compliant with BS EN 14001:2015, an internationally recognised Standard for management environmental impacts and continually improving environmental performance.

The aim of this handbook is to explain the purpose of the core documented information of the Students' Union's EMS and operational processes that have been established to meet the requirements of ISO 14001. It contains information on NTSU's activities, products and services and NTSU's management structure. It also acts as an index for the system's key documents.

4. Context of the Organisation

4.1 Understanding the Organisation and its Context

The external and internal environmental issues relevant to the context of NTSU and the associated risks and opportunities have been determined. This includes environmental conditions capable of affecting NTSU, as well as NTSU's impact on the environment. The connect review has been conducted as a [PESTLE Analysis](#) and is available on the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Compliance, Risks and Opportunities/[4.1 PESTLE Analysis](#).

4.2 Needs and Expectations of Interested Parties

All interested parties relevant to the EMS and their requirements in terms of needs and expectations, including legal compliance have been identified in the [Log of Interested Parties](#). The Log is available on the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Context and Leadership/[4.2 Interested Parties](#).

4.3 System Scope

The EMS scope has been determined to apply to all its activities, products and services across the entirety of NTSU. NTSU is a charity based across 3 campuses in Nottinghamshire, UK. The Students' Union has 56 career staff and 261 part-time employees across Commercial Services, Membership (charitable) Services, and Infrastructure, totalling 317 staff members. Both Membership Services and Infrastructure are funded via a block grant received from NTU which is received annually. The Commercial Services produce financial surplus which provides additional funding to further the Students' Union's charitable aims ([Charity Commission](#)).

All interested parties relevant to the EMS and their requirements in terms of needs and expectations, including legal compliance, have been identified in the [Log of Interested Parties](#) which can be found on the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Context and Leadership/[4.2 Interested Parties](#).

The scope of NTSU's EMS covers all buildings and land which are occupied by the Students' Union. These buildings are leased from Nottingham Trent University (NTU) and UPP, a residential and academic accommodation provider. NTU provide IT and CCTV infrastructure across all buildings in addition to managing the waste contracts and provision.

The three sites are described below.

City Campus

At the City Campus NTSU operates commercial and membership services in the non-residential areas of Byron Building (NG1 4GH). NTSU holds a lease and pays rent to NTU for use of the spaces. UPP are employed by NTU as Facilities Managers, this includes maintenance and cleaning provision. NTSU operates the service and specialist equipment in our bars, catering, coffee shops, retail, offices, and meeting rooms. NTSU has shared use of the service yard and owns containers in the yard used for storage.



NTSU also operates a small fleet of vehicles which are normally located on NTU land near the City Campus. NTSU has access to a small storage room in Terrace Royal – an NTU building near the Byron Building.

The spaces operated by NTU Sport and the Byron accommodation are not included within NTSU's scope.

Clifton Campus

At the Clifton Campus NTSU operates commercial and membership services in the Benenson Building and the ground floor of the DH Lawrence Building (NG11 8NS). Both buildings are owned, cleaned, and maintained by NTU. NTSU is a tenant with a lease from NTU and operated the services and specialist equipment in our bars, catering, coffee shops, retail, offices, and meeting rooms.

The spaces for the NTU Print Shop, toilets, and the first floor of the DH Lawrence Building are not included within NTSUs scope.

Brackenhurst Campus

At the Brackenhurst Campus NTSU operates commercial and membership services in the Main Hall (NG25 0QF). This only includes the shop, NTSU Office, Orangery, and Bar. All other areas are operated by NTU. Both buildings are owned, cleaned, and maintained by NTU. NTSU is a tenant with a lease from NTU and operates the services and specialist equipment in our bars, coffee shop, retail, and office.

The [EMS Scope](#) is located in the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Context and Leadership/[4.3 Scope](#), with site maps located in the '[NTSU Sites](#)' folder.

5. Leadership

5.1 Leadership and Commitment

The Senior Leadership Team have integrated environmental management into the Students' Union's business processes and strategic direction. Management responsibilities are assigned in the Students' Union's reporting structure, shown in Figure 1 below. This highlights how Senior Management and the EMS Implementation Team interact both internally and externally with interested parties, and how information regarding the EMS is integrated across the Students' Union.

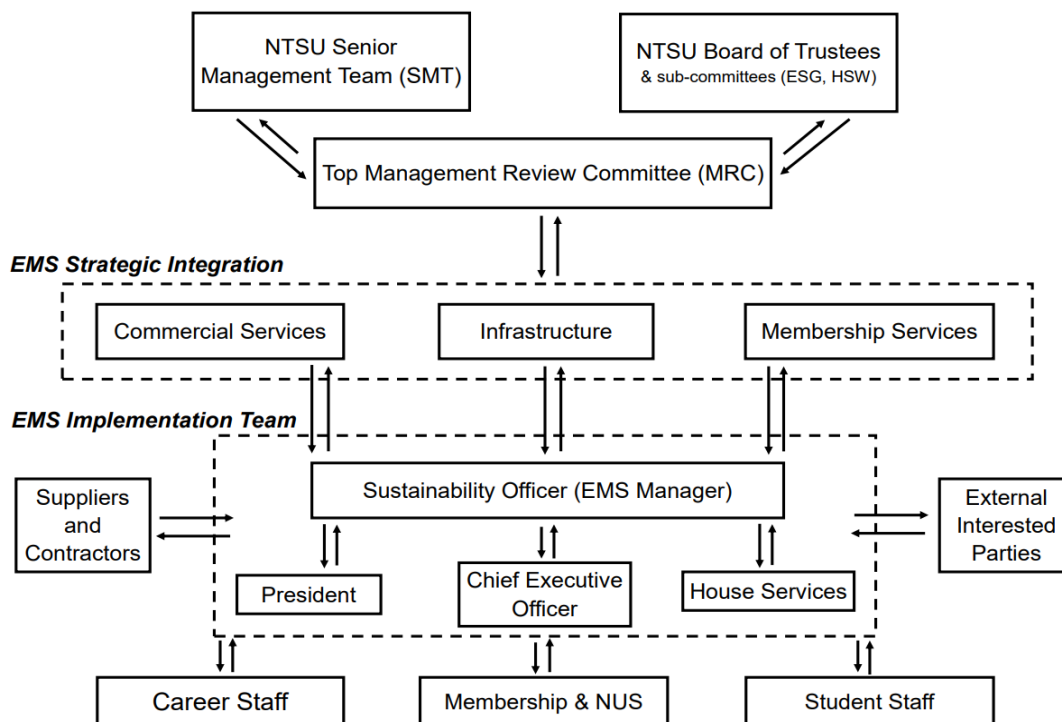


Figure 1. Reporting Structure - Responsibilities and Authorities

Integration within business processes across the Students' Union is ensured through representation at:

- Management Review Committee
- Carbon Programme Group
- Environmental and Social Governance meetings

This ensures that the EMS is compatible with the strategic direction and context of the institution.

The key individuals and committees with authority and responsibilities for implementing the EMS are outlined in Figure 1, as well as in the [NTSU Roles](#).



[Responsibilities and Training Spreadsheet.xlsx](#) which can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Roles, Responsibilities and Training/[5.3 Roles, Responsibilities and Training](#).

5.2 Environmental Policy

NTSU's [Environmental Policy](#) is located in the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Context and Leadership/[5.2 Policies](#), and is also available on the NTSU Website on the [Sustainability page](#).

The Sustainability Officer, in collaboration with Top Management, ensures that the Policy:

- Reflects NTSU's objectives
- Outlines a commitment to the protection of the environment and the prevention of pollution
- States the institution's commitment to continual improvement of the Environmental Management System (EMS) and to enhance its environmental performance
- Commits to comply with all relevant legal and other requirements (compliance obligations)

The Environmental Policy is reviewed annually as part of the Management Review, in conjunction with the review of progress of environmental objectives.

The Environmental Policy is approved by the Board of Trustees and is signed off by the CEO, and is communicated to all staff at NTSU via NTSU communication channels, including all staff emails, uploaded as a required read on BreatheHR and reported on in Environmental, Social, Governance Committee, Management Review Committee, and Union Staff Forum.

5.3 Roles, Responsibilities, and Authorities

Roles, responsibilities, and authorities within the EMS have been identified and are logged in the [NTSU Roles, Responsibilities and Training Spreadsheet.xlsx](#), which can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Roles, Responsibilities and Training/[5.3 Roles, Responsibilities and Training](#).

The details of the roles, responsibilities, and authorities associated with the EMS Reporting Structure are as follows:

Management Review Committee

Consisting of:

CEO	Phil Kynaston
Director of Commercial Services	Joe Stephenson
Director of Membership Services	Hannah Templeman
Finance Manager	Lisa Whitehead
Sustainability Officer	Abby King
House Services and Compliance Manager	Colin Hutchinson
President	Libby Sinclair

Responsibilities of the Management Review Committee include:

- Reviewing the continuing suitability, adequacy, and effectiveness of the EMS
- Assigning responsibilities and authorities across NTSU
- Determining the scope of the EMS
- Monitoring the performance of the EMS, including a review of NTSU's Environmental Policy and Objectives
- Ensuring the integration of the EMS into institutional processes

Sustainability Officer

- Has the responsibility and authority for establishing, implementing, and maintaining the EMS in accordance with the requirement of the ISO14001 Standard.
- Reports to Top Management via the Management Review Committee on the performance of the EMS, and makes recommendations for improvement.
- Identifies and prioritises the significance of environmental aspects and impacts in the [Aspects and Impacts Register](#).
- Ensures all compliance controls are identified, listed and evaluated.
- Co-ordinates the setting of the [Environmental Objectives, KPIs and Action Planner](#).
- Organises the programme of internal audits and management reviews.

- Ensures internal EMS auditors are appropriately trained.
- Co-ordinates external audits with UKAS accredited certification body, Interface.
- Implements the opportunities for improvement/corrective actions from audits and Management Review Committee.
- Revises processes, procedures, and other EMS documentation.
- Reviews and updates the [Compliance Register](#) to ensure that NTSU is up to date with relevant legislation and other compliance obligations.
- Plans action to achieve Environmental Objectives.
- Liaises with EMS Implementation Team to ensure actions are progressing as required to meet objectives.
- Identifies people (both internal and external) whose roles have, or could have, a significant impact on the environment and communicates a description of their roles and responsibilities within the EMS. This is provided in a variety of forms (presentations, emails, meeting minutes, awareness raising campaigns).
- Liaises with internal interested parties, such as staff and students.
- Communicates to interested parties about their EMS obligations, including suppliers and contractors.
- Co-ordinates environmental training and competence evaluation.
- Compiles, updates, controls, stores, and distributes relevant documented information.
- Co-ordinates the roles of the EMS Implementation Team.
- Compiling, updating, approving, controlling, storing, and distributing documents such as procedures to those involved.

EMS Implementation Team

Members of the EMS Implementation Team liaise on a regular basis to:

- Aid the Sustainability Officer with the implementation and maintenance of the EMS.
- Devise and promote initiatives to inform interested parties about the EMS.
- Assist the Sustainability Officer to conduct internal environmental audits and evaluation of compliance audits.

- Assist with the delivery of environmental training and general awareness raising.
- Ensure operational control processes are being adhered to.
- Conduct monitoring and measuring of environmental performance.
- Identifying and prioritising environmental aspects and impacts.
- Assigning roles, responsibility, and authority. Informing individuals about their obligations including suppliers and contractors whilst working with the Director of Commercial Services on purchasing.
- Compiling, updating, approving, controlling, storing, and distributing documents such as procedures to those involved.
- Ensuring all relevant legislation and requirements are identified, listed, and updated.
- Checking the NTSU complies with relevant legislation and requirements.
- Implementing the recommendations/corrective actions from audits and Management Review Committee meetings.
- Co-ordinating the mandatory EMS external audits as required.

All Staff

- Are aware of the Environmental Policy, environmental impacts associated with their areas of work, their contribution to the EMS, and any implications of non-conformance to compliance obligations.

Students

- Receive regular internal communications and have access to information about NTSU's environmental performance and initiatives.

External Interested Parties

- The needs and expectations of interested parties in relation to the EMS are recorded in the [Log of Interested Parties](#).
- The Sustainability Officer is responsible for ensuring these needs and expectations are communicated and met.

6. Planning

6.1 Actions to Address Risks and Opportunities

NTSU has determined the environmental aspects of its activities, and services that it can control and those that it can influence, and their associated environmental impacts. These are displayed in the [Aspects and Impacts Register](#), and the [PESTLE Analysis](#), this has allowed for the identification of the risks and opportunities related to the environmental aspects and compliance obligations that need to be addressed so that the EMS can achieve its intended outcomes, these are also outlined in the [Aspects and Impacts Register](#) that can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Compliance, Risks and Opportunities/[6.1.2 Aspects and Impacts](#).

In response to the identified risks and opportunities, the Sustainability Officer and Top Management sets Environmental Objectives to improve Students' Union's performance. [Operational Control](#) and [Emergency Preparedness and Response](#) Procedures are documented in the system, they have been written to address NTSU's environmental aspects, compliance obligations, risks and opportunities.

6.1.1 Environmental Aspects

NTSU has used the criteria outlined below to determine the significance of its environmental aspects, this and other documented information on environmental aspects can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/[Compliance, Risks and Opportunities](#).

Type of Environmental Impact

Each aspect is categorised as having either a positive (beneficial) or a negative (adverse) environmental impact or not applicable as appropriate, under the different operating conditions. Positive aspects are automatically highlighted as the 'Significant' cell will turn blue.

Life Cycle Stage

A life cycle stage is assigned to each aspect to demonstrate that the life cycle perspective has been considered.

Operating Conditions

An environmental aspect and its associated impacts are entered, together with type of activity and activity area. Scoring is then considered for normal and abnormal conditions, as well as foreseeable emergency situations.

- Normal Conditions: These are the usual working conditions, experienced staff or contractors carrying out the particular activity.
- Abnormal Conditions: This could be night or weekend working, if this is not the normal operating time for such activities, or when a process is starting up or shutting down. Also applies to unusual activities that are not considered to be emergencies, e.g. the purchase or decommission of vehicles, or low levels of staffing such as holiday periods.
- Emergency Conditions: This could be when floods, fires, or other accident and emergencies occur such as terrorist event, power cuts, or pandemics. An analysis of previous accidents or emergencies will help to identify potential emergency conditions.

Scoring of Severity

The severity of an environmental aspect is scored using a five-point scale depending on the severity of the environmental impact; one being the least impact and five having the greatest impact.

Scoring of Likelihood / Frequency of Impact

The likelihood or frequency of impact is based on how likely the impact is; or how frequently the impact occurs.

1 = Extremely low/Highly unlikely

2 = Low/Improbable but possible

3 = Moderate/Rarely occurs

4 = High/Occurs now and then

5 = Very high/Occurs regularly

Level of Significance

The aspects register calculates the significance of each aspect. The scores for 'Severity' and 'Likelihood / Frequency of Impact' are multiplied to provide a significance rating of between 1 and 25. This allows aspects to be ranked in order of significance.

Level of Impact/Benefit x Likelihood/Frequency of Impact = Aspect Significance

The cell colour within the 'Significance' column of the register indicates the level of significance.

Significance Score	Level of Significance	Risk	Action
1 to 8	Low	Acceptable level of risk	Monitor only
9 to 15	Medium	No immediate risk	Some monitoring and operational control may be required
16 to 25	High	High level risk	Monitoring and operational control required

Aspects with a low significance score are typically perceived as acceptable therefore only require monitoring. Aspects with a moderate significance score may require a high level of monitoring however are not generally perceived as having an immediate environmental risk. Aspects with a high significance score are typically perceived as unacceptable and will usually require operational processes to manage the risk. These aspects should be addressed at an early stage when setting environmental objectives, and planning actions to address risks and opportunities and achieve objectives.

Compliance Risk

A Yes or No can be selected in the 'Compliance Risk' column, to highlight whether the aspect is governed by legal or other requirements. Aspects with an associated compliance risk, are automatically deemed as significant.

6.1.2 Compliance Obligations

NTSU determines and assesses compliance obligations applicable to its environmental aspects, including the relevant requirements of interested parties which it has chosen to comply and considers these compliance obligations when establishing, implementing, maintaining, and continually improving its EMS.

All compliance obligations are detailed in the [Compliance Register](#), this and other documented information on compliance obligations can be accessed via the NTSU Sustainability Hub Sharepoint Site under Environmental Management System/Compliance, Risk and Opportunities/[6.1.3 Compliance Obligations](#).

Mandatory Legal Requirements:

- The University are signed up to the Compliance People: Legislation Update Service in which NTSU have a personal log in to access their full system. The Sustainability Officer receives monthly emails from the Legal Update Service with updates and changes to relevant legislation. Additional to this, monthly sign ins are completed to check legal updates as well as regular meetings with the Environmental Manager at the University to share common impacts of changing legislation.
- The Sustainability Officer is subscribed to the Cura Terrae bulletin subscription and receives compliance updates.

Other Compliance Requirements:

- The institution's determines which needs and expectations are adopted as compliance obligations.
- Other requirements are accessed via sector updates from funding bodies, e.g. HEFCE, the EAUC, as well as professional bodies, e.g. ISEP.

6.1.3 Planning Action

The Students' Union utilises the aspects and impacts register aligned to the [PESTLE Analysis](#) to enable them to take action against the highest impacting aspects of the Students' Union and reducing the risk. The Sustainability Officer in collaboration with Top Management and the Management Review Committee sets Environmental Objectives. Operational Control and Emergency Preparedness and Response Procedures address environmental aspects, compliance obligations, and risks and opportunities. Details can be found in the [Aspects and Impacts](#) and [Compliance](#) registers which can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/[Compliance, Risks and Opportunities](#).

Performance against Environmental Objectives is reported and evaluated with Top Management as part of the Management Review Process.

This EMS Handbook, the [Operational Control Procedures](#), and the [Emergency Preparedness and Response Procedures](#) are evaluated for their effectiveness as part of the Internal Audit Process. The results of which are reported to Top Management as part of the Management Review Process.

6.2 Environmental Objectives and Planning Action

Environmental Objectives and planning actions are detailed and tracked annually. This is accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Objectives and Performance/[6.2.1 Environmental Objectives](#). The objectives are also publicly available on the NTSU [Sustainability webpage](#).

The Sustainability Officer, in collaboration with Top Management, uses the ranked [Aspects and Impacts Register](#), [Compliance Register](#), and [Log of Interested Parties](#), together with other identified risks to determine the institution's Environmental Objectives.

Once objectives have been determined, the Sustainability Officer, with the support of Top Management, develops actions to achieve these, allocating resources,

responsibilities, and timescales. Appropriate information is communicated to all relevant personnel.

Environmental key performance indicators (KPIs) are set, where practicable, to monitor and measure the progress of the environmental objectives. These are set out in the [Environmental Objectives, KPIs and Action Planner 2025-26](#) which can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Objectives and Performance/[6.2.1 Environmental Objectives](#). The Sustainability Officer monitors progress on a monthly basis under a standing calendar block, and reports to Top Management as part of the management review process. Objectives are reviewed at least annually or earlier if an audit and/or management review identifies the need for change. During this process, Top Management ensures the objectives are consistent with the institution's [Environmental Policy](#), which can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Context and Leadership/[5.2 Policies](#).

7. Support

7.1 Resources

It is the responsibility of Top Management to provide the necessary resources in a timely and efficient manner to support roles with Environmental Management System responsibilities. These resources include:

- Appropriately identified staff with specialised skills and knowledge
- Appropriate infrastructure including buildings, equipment, utilities, IT, and communication.

7.2 & 7.3 Competence and Awareness

The details of all the roles and responsibilities associated with the EMS are detailed in the [Roles, Responsibilities and Training Spreadsheet](#) which is used to identify competence and awareness within staff who are involved in the successful

implementation of the EMS, this can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Roles and Responsibilities/[5.3 Roles, Responsibilities and Training](#).

The Sustainability Officer, in collaboration with Senior Management has responsibility and authority for:

- Identifying people (both internal and external) whose roles have, or could have, a significant impact on the environment, and communicating and description of their roles and responsibilities within the EMS. This is provided in a variety of forms (presentations, emails, meeting minutes, awareness raising campaigns). Evidence of communications regarding roles and responsibilities are stored in the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Communication/[7.4.2 Internal Communication Evidence](#) and [7.4.3 External Communication Evidence](#).
- Assessing competency of such individuals or groups to establish whether they have the appropriate education, training, or experience to undertake their role within the EMS. A set of requirements have been identified for each role. If deficiencies are identified, the Sustainability Officer in collaboration with the EMS Implementation Team instigates a programme of relevant training or takes actions to address these deficiencies.
- Ensuring staff who are identified as having a significant impact on the environment through their role at NTSU receive the appropriate training specific to their roles and responsibilities. This may be through mentoring, on the job training, or internal or external courses. The Sustainability Officer ensures that all relevant members of staff are adequately trained to carry out their respective responsibilities of the EMS.
- Ensuring all new employees take part in a Sustainability Induction which takes place typically within the first weeks of their employment at NTSU. The induction aims to raise staff awareness of environmental issues at all scales, what they can do to mitigate negative impacts as well as relate it specifically to their job role. It makes employees aware of what campaigns they can get involved in as well as inspire them to create their own. The Sustainability Induction is available on the NTSU Sustainability Hub Sharepoint Site under Governance and Leadership/Governance and Leadership Documents/[Staff Inductions](#).

Training activities and records are listed within the documents in the Roles, Responsibilities, and Training folder which can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Roles and Responsibilities/[5.3 Roles, Responsibilities and Training](#).

7.4 Communication

All routes used to communicate information relating to Sustainability at NTSU and the Environmental Management System, and all other supporting documents and evidence, are documented in the [Register of Communications](#), which can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/[Communication](#).

The communication process regarding authorities and responsibilities is detailed in [Institutional Roles, Responsibilities and Authorities Procedure](#), which can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Roles and Responsibilities/[5.3 Roles, Responsibilities and Training](#).

Communication Channels

The institution's [Website](#) documents all channels by which members of the public can make contact. This includes the following contact details:

Email: sustainability@su.ntu.ac.uk

Phone: +441158486212

These channels of contact can be used for both external and internal communications.

Website

The website is used to communicate information on the following:

- A summary of the Significant Environmental Aspects and Impacts
- The Sustainability Strategy
- The Annual Sustainability Report



- The Environmental Policy
- The Annual Carbon Report
- Current and recent initiatives, including general awareness raising

Enquiries and Complaints

Enquiries and complaints can be made by contacting the Sustainability Officer. Where a formal record is required, these enquiries and any response will be copied to the [Register of Communications](#) which can be accessed on the NTSU Sustainability Hub Sharepoint site under Environmental Management System/[Communication](#). This is maintained by the Sustainability Officer collecting information for the following headings:

- Category (Enquiry, Request, Complaint)
- Logged by
- Date
- Name
- Contact Details
- Details of Communication
- Handled by
- Date of Response
- Date of First Action
- Details of Response
- Follow Up Check
- Date if Further Action Required
- Status
- Date Closed

Requests for Environmental Information

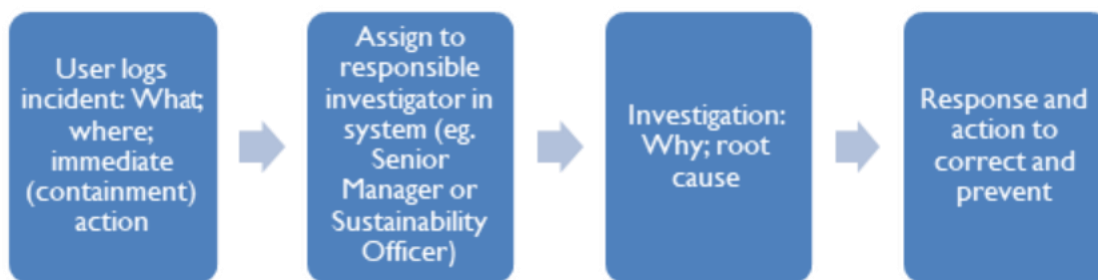
It should be noted that as a charity, the Union is not a public body and therefore not subject to Freedom of Information (FOI) or Environmental Information Requests (EIR). By default these are refused unless required under another piece of legislation. Where requests are received by interested parties that will benefit the development of the EMS the Union will consider responding and providing information only on the withdrawal of the formal FOI or EIR and a simple request and rationale. Where these

requests are complex or require significant resource not aligned with our purpose, these will be refused.

Incidents

Environmental Incidents must be reported to a member of the Management Review Committee using the [Environmental Incident Report Form](#) which can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Emergency Preparedness and Response/[8.2 Environmental Incident Reporting](#), the form should be sent to the Sustainability Officer who will log it in the [Environmental Incidents Log](#). Contact details are also available on the [Website](#).

The procedure for actioning an environmental incident is as follows:



Further details can be found in the [Emergency Preparedness and Response Procedure](#), which can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Emergency Preparedness and Response/[8.2 Emergency Preparedness and Response Procedures](#).

7.5 Documented Information

All documented information relating to the Environmental Management System can be found in their respective folders on the NTSU Sustainability Hub Sharepoint site under [Environmental Management System](#).

The Sustainability Officer, in collaboration with Top Management, ensures:

- Document information, where relevant, is stored electronically in the NTSU Sustainability Hub Sharepoint site under Environmental Management System.

The system stores documents in folders according to the clauses of the ISO14001 standard.

- The online system is maintained and provides version control, which is done through archive folders under each area.
- All EMS Procedures and the Handbook are documented and are used to establish, implement, and maintain the EMS. The Handbook and Procedures have limited editing access and can only be updated by members of the Management Review Committee. This is to ensure quality outcomes, e.g. protection from duplication or loss of integrity.
- Procedures are written using a standard template by the Sustainability Officer. This is to ensure legibility and identification. The template includes:
 - Procedure title
 - Date
 - Author and authoriser
 - Review date (All procedures are live and are updated to align to changes in operations as they occur. Annual content reviews are carried out)
 - Purpose (Clear reason for the procedure)
 - Definitions
 - Responsibilities (Key personnel referenced in the procedure)
 - Related documents (Highlighted throughout the document)
 - Process
 - Effects and actions on non-conformance
 - Version number
- Relevant staff are informed of changes to documented information and have appropriate site permissions to the NTSU Sustainability Hub Sharepoint.
- Documented information remains legible and readily identifiable and produced in the correct format.
- Documented information, including the Handbook and Operational Procedures, are reviewed and revised (if necessary) as part of the internal audit process and management review process.
- Obsolete procedures are withdrawn, and the Sustainability Officer issues and circulates revised versions to appropriate personnel.
- Documents originating from outside the institution, which are important for the planning and operation of the EMS, are identified, and their distribution controlled by the Sustainability Officer.

Uncontrolled documents such as training records, the minutes of meetings, correspondence etc. are stored in their corresponding folders in the NTSU Sustainability Hub Sharepoint site under [Environmental Management System](#), and can only be edited by the Management Review Committee.

The document control system is structure around 8 document libraries and all documents are numbered in line with the clauses of ISO14001 (Figure 2), except for auxiliary folders containing supporting documentation. Numbering the documents by clause ensures it is easy to find documents for internal and external auditing purpose.



Figure 2. The Structure of the Environmental Management System Sharepoint site

8. Operation

8.1 Operational Planning and Control

The Sustainability Officer, in collaboration with Top Management, ensures:

- Relevant departments and personnel contribute to developing appropriate operating criteria for control operations. This includes liaison with external providers regarding outsourced processes.
- Actions are implemented to achieve the institution's environmental objectives and address risks and opportunities.
- Control of the processes so deviations from operating criteria are prevented.
- Relevant processes and operating requirements are communicated to those involved, including suppliers and contractors.
- Documented information, such as operating criteria and communications with internal staff and external providers is stored electronically in the NTSU Sustainability Hub Sharepoint site under [Environmental Management System](#).
- The EMS Handbook, Operational Processes and associated criteria are reviewed and revised (if necessary) as part of the internal audit process and management review process.

All documents relating to operational control can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/[Operational Control](#). This EMS Handbook can be found on the NTSU Sustainability Hub Sharepoint site under Environmental Management System/[EMS Handbook](#).

Operational Control Procedures exist for the following areas of NTSU's activities:

- [Waste Management Procedure](#)
- [Hazardous Waste Management Process](#)
- [Energy Procedure](#)
- [Emissions to Air Procedure](#)

Which can all be found on the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Operational Control/[8.1 Operational Control Procedures](#).

Detailed operational procedures ensure that all activities are correctly carried out and monitored. These documents are used to reduce the environmental impacts of all the processes associated with NTSU's significant environmental aspects and to ensure compliance with relevant legislation.

8.2 Emergency Preparedness and Response

In the event of an environmental accident or emergency, the House Services and Compliance Manager is contacted who then liaises with the relevant personnel within NTSU, NTU, and external agencies and contractors to ensure adverse environmental impacts are prevented or mitigated. In the event that the House Services and Compliance Manager is not available, the NTU Estates Team are contacted who follow the University's [Emergency Response](#).

NTSU occupies premises leased from Nottingham Trent University and in the majority of cases environmental spill and incidents on campus will be responded to in line with and with the support of the University's procedure and processes. These are documented here: [Emergency Preparedness](#) this and all other information on NTU's emergency response can be found in the [Incident Response Folder](#) which can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/[Emergency Preparedness and Response](#).

The Sustainability Officer, in collaboration with Top Management. Ensures:

- The [Aspects and Impacts Register](#) is reviewed and revised annually to identify all potential accident and emergency scenarios.
- Relevant departments and interested parties contribute to developing appropriate emergency preparedness and response actions. This includes liaison with external agencies and contractors.
- Emergency preparedness and response actions are periodically reviewed, and if necessary revised, particularly after accidents and emergencies have occurred or following testing.

- An [Incident Response Folder](#) is provided for appropriate personnel containing the information below. This will normally involve invoking the University's [Emergency Response](#) as our landlords responsible for the buildings and campuses NTSU work on:
 - 24 hour contact details of personnel, contractors, consultants, specialists, and service providers with the responsibility for attending any of the following environmental incidents:
 - Flood;
 - Fire;
 - Pollution/spillage hazard;
 - Loss of coolant;
 - Gas leak or other emissions to air;
 - Power loss;
 - Building damage;
 - Asbestos exposure.

The following potential emergency environmental situations have been identified:

- Hazardous materials leaks and spills (e.g. fuel leaks and spills from vehicles, above ground waste cooking oil storage tanks)
- Leaks in excess of 25tCO₂e of fluorinated gas

In the event of a leak or spill from fuel or waste cooking oil, the [Emergency Spill Procedure](#) is carried out.

In the event of a fluorinated gas leak in excess of 25tCO₂e, this must be reported to the Sustainability Officer as a reportable incident via the [Environmental Incident Report Form.docx](#). This will be reported and escalated appropriately and recorded in the [Environmental Incidents Log](#).

After an incident, information is provided in the [Environmental Incident Report Form](#). Completed forms are sent to the Sustainability Officer who takes appropriate action to prevent and mitigate the environmental impacts of similar incidents in the future.



As this will typically involve invoking the University's Emergency Response, the incident report, and subsequent investigations will be typically led by the University with NTSU engaged through the Sustainability Officer or Top Management to embed learning and make changes where required. Outcomes will be reported through the Management Review Committee.

All documented information including the [Environmental Incident Report Form](#) and the University's [Incident Response](#) can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/[Emergency Preparedness and Response](#).

8.3 Emergency Spill Response

In the event of a hazardous substance spill occurring externally, the following action should be taken (only staff trained in spill response should conduct the following):

DO NOT WASH/HOSE SPILLAGE DIRECTLY INTO THE SURFACE WATER DRAINAGE SYSTEMS

1. Determine the material involved and seek material data sheet if necessary – refer to [COSHH register](#).
2. Seek assistance dependant on level of spill
3. If there is danger to individuals, or you are unsure, evacuate the area and contact **Senior Management or NTU Security** who have in & out of hours contacts and give the following information:
 - a. Location of the spill
 - b. Name of substance spilt
 - c. Nature/source & volume of spillage
 - d. Has anyone been injured
4. If there is no immediate danger, and the material is still leaking, or spilling, collect the appropriate [spill kit](#) necessary to contain the spill.
5. Take appropriate action to stop the flow (close valve, plug leak etc). Personal Protective Equipment (PPE) must be worn.
6. To prevent the spill entering a storm drain or sewer it may be necessary to either cover or bund the relevant access point before containing the spill.
7. Contain the spill to prevent further spread using appropriate absorbing materials such as absorbent booms, socks or sand.
8. If some material has entered the storm drain or a watercourse, contact the NTU Environmental Manager or out of hours NTU Security.

9. Absorb and collect the resultant material.
10. Place all contaminated clean-up materials in a hazardous waste bag, available within the spill kit. This must be disposed of as hazardous waste.
11. Record the incident using the environmental incident report form and send it to the NTU Environmental Manager & Senior Management.
12. The Senior Management and NTU Environment Manager will determine who will carry out a thorough review of the incident identifying any preventative actions that may be required.
13. Re-stock the spill kit and re-order any materials not available.
14. This procedure is reviewed annually and either a desk-top or real-life simulation created to test its effectiveness.

In summary: Close off the source of the spill and collect spill kit. Contain the spill. Collect the spilled material using appropriate absorbent material. Communicate with internal personnel as appropriate and clear the spill away. Record and report the incident.

After the incident, information is provided in the [Environmental Incident Report Form](#). Completed forms are sent to the Sustainability Officer who sends it to top Management and the NTU Environment Manager who will liaise and take appropriate action to prevent and mitigate the environmental impacts of similar incidents in the future.

NTSU occupies premises leased from Nottingham Trent University and in the majority of cases environmental spill and incidents on campus will be responded to in line with and with the support of the University procedure and processes. These are documented here: [Emergency Preparedness](#).

[Site Service Plans](#), including [Drainage Plans](#), are available to all staff and can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Emergency Preparedness and Response/Incident Response/NTU Emergency Preparedness and Response/[NTU Emergency Response Folder](#). These are updated regularly and can be used to assist the fire service in the event of an emergency.



All documents relating to Emergency Spill Response can be found on the NTSU Sustainability Hub Sharepoint site under Environmental Management System/[Emergency Preparedness and Response](#).

9. Performance Evaluation

9.1 Monitoring, Measuring, Analysis and Evaluation

[Monitoring, Measuring, Analysis and Evaluation Procedure](#) outlines how NTS monitors, measures, analyses, and evaluates its environmental performance and the effectiveness of the EMS. NTSU has Monitoring, Measuring, Analysis, and Evaluation processes for Waste, Hazardous Waste, Energy, and Emission to Air, these include how environmental performance criteria and key performance indicators are set.

All information and documentation related to Monitoring, Measuring, Analysis, and Evaluation can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Monitoring, Non-Conformance and Improvement/[9.1 Monitoring and Measuring](#).

9.1.1 Evaluation of Compliance

Legislative compliance is reviewed and checked seeking evidence for each piece of legislation. There is a link to evidence within the [NTSU Compliance Register](#).

The Sustainability Officer, in collaboration with Top Management:

- Maintains knowledge of compliance through the [Compliance Obligations Procedure](#).
- Co-ordinates an audit of areas where legal and other compliance obligations apply to ensure that all those involved are complying with requirements. This is undertaken as part of the Internal Audit, details can be seen in the [Internal Audit Schedule](#).

- Ensures any identified opportunities for improvement, observations, or non-conformities are recorded on the [Environmental Findings Log](#).
- Ensures corrective actions following compliance audits are periodically reviewed, and if necessary revised, and are documented in the [Corrective Action Record Form](#) and information from the forms stored in the [Environmental Findings Log](#).
- Reports any findings from the audit to the Management Review Committee.

The [Compliance Obligations Procedure](#) and [Compliance Register](#) can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Compliance, Risks and Opportunities/[6.1.3 Compliance Obligations](#).

The [Internal Audit Schedule](#) and [Internal Audit Report](#) for documenting and undertaking compliance audits can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Monitoring, Non-Conformance and Improvement/[9.2 Internal Audit](#).

[Corrective Action Record Form](#) for documenting actions from the audit and the [Environmental Findings Log](#) where the information is stored can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Monitoring, Non-Conformance and Improvement/[10.2 Non-Conformity and Corrective Action](#).

9.2 Internal Audit

Internal audits are periodically conducted to assess the effectiveness of the EMS. The Environment Manager from NTU is responsible for completing NTSU's Internal EMS Audit which is coordinated by the Sustainability Officer. All documented information regarding internal audits can be found in the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Monitoring, Non-Conformance and Improvement/[9.2 Internal Audit](#).

The Sustainability Officer, in collaboration with Top Management:

- Determines the audit criteria, scope, frequency, and the methods to be used, this information is recorded on the [Internal Audit Schedule](#), and ensures it is based on the environmental importance of the activity concerned and the results of previous audits.
- Ensures that all internal auditors are appropriately trained and competent to conduct internal environmental audits, and that they record their findings accurately.
- Allocates auditors specific clauses to audit in agreed time-scales, whom produce an audit plan and scope before conducting the audit, document their findings, including details of any opportunities for improvement (OFIs), or non-conformances using the [Internal Audit Report](#) template.

The Environment Manager from NTU is responsible for conducting the audit on behalf of NTSU in an impartial and objective way. Internal audits are conducted bi-annually addressing different clauses as defined by the Sustainability Officer. The Environment Manager produces an audit report.

The Sustainability Officer holds a closing meeting with the internal auditor to discuss all findings before summarising and reporting to the Management Review Committee for consideration at their next meeting.

9.3 Management Review

The Management Review Committee (MRC) addresses the continuing suitability, adequacy, and effectiveness of the EMS and makes recommendations for improvement. MRC meetings occur quarterly and will reduce to at least annually, usually following internal and external audits, once accredited.

The Management Review Committee takes into consideration the following:

- The status of action from previous management reviews;
- Changing circumstances regarding external and internal issues relevant to the EMS, such as needs and expectations of interested parties, compliance obligations, significant environmental aspects, and risks and opportunities;

- An evaluation of the extent to which the institution's objectives have been met;
- Environmental performance information, such as the findings of recent internal audits and compliance evaluation;
- The status of non-conformities and corrective actions;
- Relevant internal and external communications from interested parties.

Outputs from the meetings include decisions and actions related to improvements and change in the EMS and Environmental Objectives, as well as opportunities to integrate the EMS with other internal processes and in line with the strategic direction of the institution.

The minutes of the MRC meetings can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Monitoring, Non-Conformance and Improvement/9.3 Management Review/[Meetings](#). All other documents relevant to the MRC can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Monitoring, Non-Conformance and Improvement/[9.3 Management Review](#).

10. Improvement

10.1 General

NTSU use all of the data gathered during the Monitoring, Measuring, Analysis and Evaluation, Management Review, and Internal Audit processes to determine opportunities for improvement. The following sections outline how this is achieved to deliver a cycle of continuous improvement.

10.2 Non-Conformity and Corrective Action

Non-conformities are a result of either not complying with legislation, not conforming to the ISO14001 standard requirements, or not conforming to the requirements of the system, e.g. operating procedures or procedures documented in the System Handbook.

The Sustainability Officer has the responsibility and authority for investigation and correcting non-conformities and taking action to mitigate associated negative environmental impacts.

The Sustainability Officer, in collaboration with Top Management, ensures:

- Details of any non-conformity, observations, and opportunities for improvement identified, usually as a result of internal and external audits, are received by the Sustainability Officer. These are recorded on the [Environmental Findings Log](#) which can be accessed via the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Monitoring, Non-Conformance and Improvement/[10.2 Non-Conformity and Corrective Action](#).
- After an environmental incident, non-conformance information is provided in the [Environmental Incident Report Form](#). Completed forms are sent to the Sustainability Officer who takes appropriate action to control, correct, and deal with the consequences of non-conformities, and details logged in the [Environmental Incidents Log](#). The log and form can be found, and completed forms are stored in the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Emergency Preparedness and Response/[8.2 Environmental Incident Reporting](#).
- The Sustainability Officer authorises the corrective actions and the timescales involved for their implementation and documents this through a [Corrective Action Record Form](#). The actions taken are appropriate to the magnitude of the non-conformity and the resultant environmental impacts. The Sustainability Officer checks the corrective actions/mitigations have been carried out and, if they have, signs off the Corrective Action Record Form (when used).
- Blank forms can be found and completed forms are stored within the NTSU Sustainability Hub Sharepoint site under Environmental Management System/Monitoring, Non-Conformance and Improvement/[10.2 Non-Conformity and Corrective Action](#).

- The Sustainability Officer analyses the effectiveness of corrective actions and determines the root causes of the non-conformities and takes necessary action to prevent their recurrence.
- The effectiveness of corrective actions and preventive actions taken is reviewed by the Sustainability Officer and Top Management once annually as part of the Management Review Committee meeting.

10.3 Continual Improvement

NTSU will continually improve the suitability, adequacy, and effectiveness of the Environmental Management System to enhance environmental performance. A few examples of how this process will be undertaken are listed below, however continual improvement is a process woven throughout the EMS.

- Auditing the EMS (both internally and externally) and implementing appropriate recommendations or suggestions
- Annual review at the Management Review Committee of EMS objectives and their progress against targets to ensure these also cover more positive aspects
- Reviewing [Corrective Action Record Forms](#) and [Environmental Incident Report Forms](#), and either refining or putting into place new procedures and processes