



ENVIRONMENTAL MANUAL

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Introduction

This manual describes Nottingham City Homes (NCH) Environmental Management System (EMS). The EMS is the first level guide to implementing the corporate Environmental policy and procedures. The System consists of an authorised set of documentation, including Environmental Policy, procedures, and records that document activities that are used for the effective management of the system. The Environmental Management System is designed to meet the requirements of the ISO 14001:2015 Environmental management systems-Requirements

1. Scope

The Environmental Management System assures that Construction, Repairs and Maintenance and Asset Management Development (CRMAMD) products are processed under the control of the system. The System is designed to adhere to ISO 14001:2015 standard. The system assures conformance to legal requirements and the company's environmental policy and provides objective evidence of effective control.

This Environmental Manual includes NCH's Environmental Policy, identifies management responsibilities, and references the procedures of CRMAMD, and supporting Environmental Management System documents and records. The system commits to continual improvement and ensures that interested parties are considered. We provide leadership to manage the system and communicate it throughout our organisation. The system complies with all regulatory requirements and is driven by the environmental objectives defined by management. The system is planned, implemented and reviewed while considering the context of our organisation and all significant aspects are reviewed. Effectiveness is measured through internal audits, external audits and management review.

2. Normative reference

This Environmental Manual defines the policies and principles applied against the requirements of ISO14001:2015 and relates to all activities carried out within CRMAMD which have an environmental impact. It lays down guidelines within which CRMAMD can operate. Each section of the manual is related to an identified element of ISO14001:2015.

Distribution

The Business Improvement & Performance Manager is responsible for the controlled internal distribution of this manual, and changes thereto. Outside organisations and personnel have access to the latest revision of the Environmental Manual through the NCH website.

Uncontrolled Manuals

All manuals are up-to-date at issue on the NCH intranet and are "Uncontrolled when printed".

3 Terms and definitions

This document introduces new definitions set out in the table below and also relies on the following:

1. Definitions typically used by our customers, stakeholder or marketplace;
2. Terms typically used in standards and regulations as they relate to our QMS or services;
3. Standard business terminology;
4. Terms and vocabulary commonly used in environmental practices.

Term	Definition
NCH	Nottingham City Homes
CRMAMD	Construction, Repairs and Maintenance and Asset Management and Development
NCC	Nottingham City Council
CE	Chief Executive
BIPM	Business Improvement & Performance Manager
QMS	Quality Management System
Quality	The degree to which a set of inherent characteristics fulfils requirements or enhancement of customer satisfaction
The Company	Nottingham City Homes
The Standard	BS EN ISO 14001:2015 Environmental management systems requirements
Process	A set of interrelated or interacting activities which transforms inputs into outputs
Procedure	A Specified way to carry out an activity or a process
Work Instruction	A detailed set of instructions that describe exactly how a low-level activity must be carried out
Top Management	The most senior management of the Company which includes the Chief Executive and the other members of the Executive Management Team (EMT).
Interested party	Person or organisation that can affect, be affected by, or perceive itself to be affected by a decision or activity

In this manual, the use of the following words has special meaning:

Term	Definition
Shall	Indicates a mandatory requirement, usually based on some published standards
Should	Indicates a requirement for good practice, which should be implemented whenever possible
May	Indicates a desirable requirement.

4 Context of the organisation

4.1 Understanding the organisation and its context

Nottingham City Homes (NCH) is an Arm's Length Management Organisation (ALMO), which manages and maintains Nottingham City Council's (NCC) rented housing stock of around 26,000 properties and 1,000 leasehold properties. NCH is a

Company limited by guarantee, and is wholly owned by NCC, as the sole shareholder. NCH became operational on 1 April 2005 and currently employees 1,000 employees. The Company is subject to the provisions of the Companies Act, and operates under the terms of Part V of the Local Government and Housing Act and was set up under Section 2 of the Local Government Act 2000.

The Construction, Repairs and Maintenance and Asset Management and Development section (CRMAMD) of Nottingham City Homes provides a comprehensive, high quality construction, repairs and maintenance service, including the building of new properties, for Nottingham City Councils tenants and leaseholders and a complete range of landlord services. It is also responsible for the asset management and improvement of its properties. We recognise the need to protect and enhance the local and global environment through our own and others' activities. We are committed to minimising our adverse environmental impacts, while enhancing the quality of life for our customers.

The success and reputation of NCH may be measured by the high standing maintained with its customers.

Our Vision

To create homes and places where people want to live

Our goals

- To listen to our residents and deliver an excellent housing service
- To make all of our estates great places to live
- To build high quality, affordable new homes for local people
- To diversify our services, re-investing in our communities
- To be a great place to work.

Our values

- Passionate about **D**elivering services
- **R**espect people – our colleagues, our customers, our communities
- Always looking for ways to **I**mprove
- Provide great **V**alue for money
- **E**ffective team working with each other, our customers and our partners

4.2 Understanding the needs and expectations of interested parties

NCH has determined the interested parties that are relevant to its environmental management system. This document can be found on the intranet and is available to all employees. The document includes the relevant needs and expectations (i.e. requirements) of these interested parties and which of these become its compliance obligations.

4.3 Determining the scope of the environmental management system

The Environmental Manual provides specifics used by CRMAMD to meet ISO14001:2015 Environmental Management System requirements.

The scope of the Environmental Management System consists of the following:

“Building maintenance and repair: building services and new building contract work”.

The geographical scope of the EMS covers Nottingham city area and areas outside of the city boundary where vehicles may travel to or from work each day. This EMS covers the following activities:-

- Building maintenance and repair;
- Building services and new building contract work.

In determining this scope NCH has given consideration to the external and internal issues referred to in 4.1 and the compliance obligations referred to in 4.2.

4.4 Environmental management system

CRMAMD has established, documented and implemented an Environmental Management System, which will be maintained and continually improved in accordance with the International Standard ISO14001:2015. To implement this system, CRMAMD has:

- Identified the processes needed for the Environmental Management System and their application throughout CRMAMD.
- Identified the environmental aspects of CRMAMD.
- Determined the sequence and interaction of these processes and aspects.
- Determined criteria and methods required to ensure the effective operation and control of these processes and aspects.
- Identified risks and opportunities relating to its environmental aspects.
- Identified the needs and expectations of interested parties.
- Ensured the availability of information that is necessary to support the operation and monitoring of these processes and aspects.
- Put procedures in place to manage, monitor, measure and analyse these processes and aspects.
- Implemented action necessary to achieve planned results and continual improvement.

Where a process is outsourced that affects conformity to this standard, NCH will ensure that controls exist for the adequate provision of resources and that the service meets customer and business needs in line with the standard.

NCH has established an Environmental Management System and manual as a structured and systematic tool to demonstrate its ability to provide a consistent service that meets customer and applicable statutory and regulatory requirements. This enables the company to address and achieve customer satisfaction through the effective application of the system, including processes for continual improvement and the prevention of nonconformity.

The overall process model of the Environmental Management System is operated by the application of the Plan-Do-Check-Act method described below:

Plan: establish the objectives, aspects and processes necessary to deliver results in accordance with customer requirements and NCH policies.

Do: Implement the processes, aspects and controls.

Check: Monitor and measure processes, service and aspects against policies, objectives and requirements for the service and report results.

Act: Take actions to continually improve process performance.

The Environmental Management System describes how NCH has established and maintained an Environmental Management System as a means of ensuring that the aspects of its activities and services that could effect the environment, conform to its Environmental Policy and associated objectives and targets.

The EMS has been devised to provide effective environmental management and performance for NCH. Environmental management is an integral part of the overall management system.

The system has been designed to integrate with other management systems to use the existing organisational structure and responsibilities. It is managed by the Business Improvement and Performance Manager.

5 Leadership

5.1 Leadership and commitment

Top management of NCH demonstrate their leadership and commitment with respect to the environmental management system by:

- a) Taking accountability for the effectiveness of the EMS;
- b) Ensuring that the environmental policy and environmental objectives are established and are compatible with the strategic direction of the organisation;
- c) Ensuring the integration of the EMS requirements into the organisations business processes;
- d) Ensuring that the resources needed for the EMS are available;
- e) Communicating the importance of effective environmental management and of conforming to the EMS requirements;
- f) Ensuring that the EMS achieves its intended outcomes;
- g) Directing and supporting persons to contribute to the effectiveness of the EMS;
- h) Promoting continual improvement;
- i) Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

5.2 Environmental Policy

The Environmental policy of NCH has been defined by top management and issued by the Chief Executive. It has been communicated to all employees and persons working on behalf of CRMAMD. It has been posted in various strategic locations throughout NCH, and is available for viewing on the Internet and Intranet for all interested parties. The Management team of NCH reviews the policy at Management reviews to ensure continued suitability.

The policy is appropriate to the nature, scale and environmental impacts of our activities, products and services. It includes the commitment being made by NCH to:

- Ensure continual improvement to enhance environmental performance;
- Prevent pollution;
- Comply with applicable legal requirements and with other requirements to which CRMAMD subscribes, which relate to our environmental impacts.

The policy also provides the framework for setting and reviewing environmental objectives and targets.

5.3 Organisational roles, responsibilities and authorities

Roles, responsibilities and authorities have been defined, documented and communicated in order to facilitate effective environmental management.

A specific Management Representative has been appointed by top management. This is the post of Business Improvement & Performance Manager. Irrespective of other responsibilities, this role has the following defined roles, responsibilities and authority:-

- Ensuring that an Environmental Management System is established, implemented and maintained in accordance with the international standard
- Reporting to top management on the performance of the Environmental Management System for review, including recommendations for improvement.
- Chairing the CRMAMD environmental management review meeting and to ensure that recommendations are implemented
- To co-ordinate the actions and reports of the environmental management representatives.
- Assess the adequacy of the system to produce continual environmental performance against objectives and targets.
- Assess the impact of pending and new legislation and policy developments.
- Assess how CRMAMD is likely to be affected by emerging environmental issues.
- Ensure that effective channels of communication on environmental issues are established and maintained both internally and with external interested parties.
- Ensure that personnel at both management and operational levels are motivated on environmental issues to attain a consistent approach.
- Providing environmental information and support to all areas of CRMAMD
- To act as lead environmental auditor and assess audit reports.

Other key roles, responsibilities and authority include:-

Chief Executive, Director of Construction, Repairs and Maintenance and Director of Investment and Business Services (top management)

Responsibilities include:

- Top management responsibility for the overall direction, sufficiency and effectiveness of the Environmental Management System.
- Approve and sign the environmental policy.
- Ensure that sufficient trained personnel and resources are available to effectively operate the Environmental Management System.

Assistant Directors

Responsibilities include:

- To act as deputy to top management when required for environmental matters.
- To ensure that environmental issues affecting the division are communicated to the Service/Project Managers and that appropriate actions are taken.

Service / Project Managers

Responsibilities include:

- To ensure that environmental issues are integrated into the management of the activities of the service area.
- To ensure that all activities of the service area are carried out in a manner to minimise the impact on the environment.
- To ensure that all of their staff are aware of the environmental impact of their actions.
- To ensure adequate resources are available and that staff are trained and competent to deal with environmental matters.
- To ensure that all staff are aware of environmental legislation and policy developments.
- To assess and report on environmental performance against objectives and targets, both internally and to all interested parties.
- To ensure that the results of reviews are implemented and corrective action taken.
- The identification of the verification requirements, the implementation of procedures, the provision and assignment of adequate resources and competent personnel for verification activities.
- Receiving and responding to communications (internal and external) from relevant interested parties concerning environmental effects and management.

Fleet, Facilities and Stores Manager

Responsibilities include:

- To manage the office and site accommodation and all fleet related issues.

6 Planning

6.1 Actions to address risks and opportunities

6.1.1 General

CRMAMD has an Environmental Plan that consists of the Objectives, an Environmental Manual and procedures. By following the Environmental Manual and the procedures, and by striving to meet the Environmental Objectives, CRMAMD is able to comply with the requirements of the ISO 14001:2015 specifications. If it becomes necessary to implement any procedures or policies that are not currently in the Environmental Plan of CRMAMD, then a Plan using the guidelines for planning as per the ISO 14001:2015 guidelines shall be used.

6.1.2 Environmental Aspects

The BIPM in consultation with Top management, Assistant Directors, Project Managers, Responsible Officers and Environmental Management representatives are responsible for identifying and evaluation of the environmental aspects of CRMAMD.

Environmental aspects shall be recorded on the relevant system and shall be stored and filed on the Internet. The procedure for evaluating environmental aspects can be found on the NCH intranet system.

When assessing the environmental aspects of CRMAMD, the activities, products and services of all service areas are considered along with the life cycle perspective. The actual and potential, positive and negative environmental impacts associated with these are identified. Once evaluated, any which are determined to be significant, using established criteria, are then recorded on the Internet. Abnormal conditions and foreseeable emergency situations are also included.

Significant environmental aspects can result in risk and opportunities associated with either adverse environmental impacts (threats) or beneficial environment impacts (opportunities).

The environmental impacts associated with the aspects are taken into account when setting the environmental objectives and targets. All relevant managers have access to this information via the internet and the aspects are communicated at least annually.

The aspects must be reviewed at intervals no greater than 12 months and/or as a result of:

- Changes or planned changes in activities, products and services
- An environmental incident
- Actual or potential changes in legislation

6.1.3 Compliance obligations

NCH have established, implemented and maintain a procedure that:

- Identifies and allows access to the applicable legal requirements and other requirements to which CRMAMD subscribes relating to its environmental aspects
- Determines how these requirements apply to its environmental aspects.

NCH ensures that these applicable legal, and any other requirements are taken into account when establishing, implementing and maintaining its Environmental Management System.

The BIPM is responsible for maintaining the procedure and the documentation, which can be found via the NCH intranet.

The BIPM is responsible for ensuring that CRMAMD is complying with its legal obligations by conducting a legal compliance audit on an annual basis. The BIPM shall maintain documented information of its compliance obligations. Compliance obligations can result in risks and opportunities to the organisation.

The legal and other requirements must be reviewed at intervals no greater than 12 months and/or as a result of any changes to:

- The activities, products or services of within scope
- Any changes in relevant environmental legislation
- Any review of aspects identification and evaluation

6.1.4 Planning action

NCH has identified and planned the operations and actions to address risks and opportunities, compliance obligations and significant aspects, consistent with its environmental policy and objectives and targets. NCH has ensured that these are carried out under specified conditions by establishing, implementing and maintaining a documented procedure to control situations where their absence could lead to deviation from the environmental policy and objectives and targets.

NCH has also established, implemented and maintained procedures related to the identified risks and opportunities, compliance obligations and significant aspects of goods and services used, and communicate these to suppliers and contractors. The procedures can be found on the NCH intranet.

These actions are implemented and integrated into the Environmental Management System and business processes as and when required. When planning these actions NCH give consideration to its technological options, and its financial, operational and business requirements.

6.2 Environmental objectives and planning to achieve them

6.2.1 Environmental objectives

NCH have established, implemented and maintain documented environmental objectives and targets, at relevant functions and levels.

Wherever possible, the objectives and targets are measurable and consistent with the environmental policy, monitored, communicated, and compliant with applicable legal and other requirements and show improvement.

When establishing and reviewing environmental objectives and targets, NCH considers the legal and other requirements, and its significant environmental aspects. NCH also considers:

- Technological options
- Financial requirements
- Operational requirements
- Business requirements
- Views of interested parties

NCH has established, implemented and maintained a programme to ensure its objectives and targets are achieved. This programme includes:-

- Designation of responsibility for achieving objectives and targets
- Target dates for achievement
- Resources required to achieve objectives and targets

The BIPM is responsible for the programme which is distributed to all relevant staff and can be found on the NCH intranet.

The BIPM is responsible for the procedure for evaluating environmental objectives and targets and this can be found on the NCH intranet.

6.2.2 Planning actions to achieve environmental objectives

The BIPM is responsible for ensuring that a procedure exists for planning how to achieve environmental objectives. NCH determines, what will be done, what resources will be required, who will be responsible, when it will be completed and how the results will be evaluated.

Periodic monitoring and measurement of the objectives ensures top management are in a position to quickly rectify or influence any possible issues and wherever possible objectives are integrated into business processes.

7 Support

7.1 Resources

NCH has ensured the availability of resources essential to establish, implement, maintain and continually improve the Environmental Management System. Resources include human resources and specialised skills, organisational infrastructure, technology and financial resources.

Roles, responsibilities and authorities have been defined, documented and communicated in order to facilitate effective environmental management.

A specific Management Representative has been appointed by top management. The post of Business Improvement and Performance Manager, irrespective of other responsibilities, as the following defined roles, responsibilities and authority:-

- Ensuring that an Environmental Management System is established, implemented and maintained in accordance with the international standard
- Reporting to top management on the performance of the Environmental Management System for review, including recommendations for improvement.
- Chairing the CRMAMD environmental management review meeting and to ensure that recommendations are implemented
- To co-ordinate the actions and reports of the environmental management representatives.
- Assess the adequacy of the system to produce continual environmental performance against objectives and targets.
- Assess the impact of pending and new legislation and policy developments.
- Assess how CRMAMD is likely to be affected by emerging environmental issues.
- Ensure that effective channels of communication on environmental issues are established and maintained both internally and with external interested parties.
- Ensure that personnel at both management and operational levels are motivated on environmental issues to attain a consistent approach.
- Providing environmental information and support to all areas of CRMAMD
- To act as lead environmental auditor and assess audit reports.

Other key roles, responsibilities and authority include:-

Chief Executive, Director of Construction, Repairs and Maintenance, Director of Investment and Business Services (top management)

Responsibilities include:

- Top management responsibility for the overall direction, sufficiency and effectiveness of the Environmental Management System.
- Approve and sign the environmental policy.
- Ensure that sufficient trained personnel and resources are available to effectively operate the Environmental Management System.

Assistant Directors

Responsibilities include:

- To act as deputy to top management when required for environmental matters.
- To ensure that environmental issues affecting the division are communicated to the Service/Project Managers and that appropriate actions are taken.

Service / Project Managers

Responsibilities include:

- To ensure that environmental issues are integrated into the management of the activities of the service area.
- To ensure that all activities of the service area are carried out in a manner to minimise the impact on the environment.
- To ensure that all of their staff are aware of the environmental impact of their actions.
- To ensure adequate resources are available and that staff are trained and competent to deal with environmental matters.
- To ensure that all staff are aware of environmental legislation and policy developments.
- To assess and report on environmental performance against objectives and targets, both internally and to all interested parties.
- To ensure that the results of reviews are implemented and corrective action taken.
- The identification of the verification requirements, the implementation of procedures, the provision and assignment of adequate resources and competent personnel for verification activities.
- Receiving and responding to communications (internal and external) from relevant interested parties concerning environmental effects and management.

Fleet, Facilities and Stores Manager

Responsibilities include:

- To manage the office and site accommodation and all fleet related issues.

7.2 Competence

NCH will ensure that any person(s) performing tasks for it or on its behalf that have the potential to cause a significant environmental impact(s) is (are) competent on the basis of appropriate education, training or experience and will retain associated records.

NCH will identify training needs associated with its environmental aspects and its Environmental Management System. NCH will provide training or take other action to meet these needs and shall retain associated records.

The duration, level and detail of training depend on the individual's duties and responsibilities. Generally the greater the responsibility the longer and more detail included in the training. Project/Service Managers, together with the BIPM are responsible for identifying training needs and for ensuring appropriate training is provided.

Procedures already exist within NCH for identifying training needs and reference should be made to these established procedures contained within the ISO9001 folder.

A procedure also exists to identify specific environmental issues and this can be found on the NCH intranet.

Internal Environmental Auditors are trained and competent to audit the departments Environmental Management System and aspects and where necessary recommended improvements. Internal auditors meet annually or before re-auditing (whichever comes first) to be briefed on changes, new developments and audit paperwork to ensure audits are carried out consistently. Internal auditors receive refresher training every 5 years.

Employees performing tasks that can cause significant environmental impacts are trained to a level of competence to ensure they incorporate recommended safe working practices and these activities are closely supervised.

7.3 Awareness

NCH has established and maintains procedures to ensure that its employees or people working on behalf of NCH, at all levels are aware of:

- The importance of compliance with the environmental policy and objectives.
- The significant environmental aspects and related actual or potential impacts associated with their works.
- Their roles and responsibilities.
- The need to adhere to the Environmental Management System.
- The need to comply with all compliance obligations.
- Benefits of improved personal performance.
- Consequences of departure from procedures.
- Emergency preparedness and response.

7.4 Communication

7.4.1 General

NCH has established a Communications Procedure to manage internal and external communications with respect to the EMS and related matters.

With regard to the environmental aspects and Environmental Management System, NCH has established, implemented and maintains a procedure for the following:

- Internal communication among the various levels and functions of the organisation.
- Receiving, documenting and responding to relevant communication from external interested parties.

7.4.2 Internal communication

The BIPM is responsible for co-ordinating and logging all internal communications relating to the EMS. Environmental information is communicated internally in a variety of ways as follows:

- Uncontrolled copies of certain EMS elements are displayed in appropriate locations. Only those EMS elements essential to day-to-day operations are printed and displayed in this way to minimise paper waste and to maintain Document Control.
- Where new or amended EMS elements become available these are brought to the attention of relevant employees as soon as practicable. Personnel are also reminded to update any printed versions of the documents under their control.
- Workshops, seminars and/or other training events (including induction training) are used to inform employees about the scope of the EMS, its purpose and the general duties which it imposes on all employees.
- Employees and contractors whose activities directly impact on Significant Environmental Aspects are provided additional specific training as appropriate.
- NCH internal communications network is used to keep employees informed of general EMS developments and related matters.
- Specific information on the EMS and related matters is also communicated via meetings and/or telephone conversations with relevant personnel where appropriate.
- Contractors are made aware of the Environmental Policy, relevant procedures and standards of environmental care required by the EMS before any work may commence.

The BIPM and top management encourages the use of electronic communication wherever possible/ appropriate in order to help minimise paper waste.

7.4.3 External communication

CRMAMD may communicate externally about any significant environmental aspects and will then document its decision. If the decision is to communicate, NCH has established and implemented a method for this communication in the procedure located on the NCH intranet.

The BIPM is provided copies of all written communications from external interested parties relating to the EMS and related matters and responds to these as appropriate.

All correspondence from regulatory authorities relating to suspected environmental offences will be prioritised for urgent action. In all cases the BIPM will be informed immediately and appropriate action will be taken as soon as practicable.

Records of correspondence with regulatory authorities relating to the EMS and related matters are retained for a minimum period of five years.

NCH does not communicate our significant aspects externally. However certain environmental information, such as performance information, is externally communicated via reports, the website (nottinghamcityhomes.org.uk), and/or other media as appropriate. All data derived from the EMS must be confirmed as accurate by the BIPM before publication.

Details of any received Environmental Complaints are dealt with at source and others are escalated up to the BIPM, as appropriate.

The complainant will be informed that his/her complaint is being investigated and that further information will be provided as appropriate when the investigation is complete.

Once the validity of the complaint has been verified appropriate Corrective Action and/or Preventive Action will be implemented as soon as practicable.

All environmental complaints are monitored across NCH. The relevant staff are responsible for recording all complaints in relevant logs.

7.5 Documented information

7.5.1 General

NCH has established the following EMS documents to ensure the effective management of its environmental performance:

- Environmental policy.
- Environmental objectives and targets.
- Description of the scope of the environmental management system.
- The compliance register and environmental impact and aspect register.
- A description of the main elements of the EMS and their interaction, and reference to related documents.
- All documents required by the International Standard.
- All documents necessary to ensure the effective planning, operation and control of processes that relate to the significant environmental aspects.

Controlled copies of the EMS Manual are held by the BIPM as part of the file storage system.

7.5.2 Creating and updating

When creating and updating documented information, NCH shall ensure appropriate:

- Review and approval of documents for adequacy prior to initial release
- Periodic review, update and re-approval of existing documents as required
- Clear document identification, format, revision indication, and current revision status.

7.5.3 Control of documented information

Documents required by the Environmental Management System and by the International Standard are controlled by NCH. NCH have established, implemented and maintain a procedure to:

- Approve documents for adequacy prior to issue.
- Review and update as necessary and re-approve documents.
- Ensure that changes and the current revision status of documents are identified.
- Ensure that relevant versions of applicable documents are available at points of use.
- Ensure that documents remain legible and readily identifiable.
- Ensure that documents of external origin determined by NCH to be necessary for the planning and operation of the Environmental Management System are identified and their distribution controlled.
- Prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose.

QMS Procedure 01 – Document Control is used for this purpose and can be found on the NCH intranet.

8 Operation

8.1 Operational planning and control

NCH has identified and planned the operations associated with the identified significant environmental aspects consistent with its environmental policy and objectives and targets, risks and opportunities, and compliance obligations, with an emphasis on the life cycle elements. NCH has ensured that these are carried out under specified conditions by establishing, implementing and maintaining a documented procedure to control situations where their absence could lead to deviation from the environmental policy and objectives and targets.

NCH has also established, implemented and maintained procedures related to the identified significant environmental aspects of goods and services within the scope of the EMS and communicates these to suppliers and contractors. The procedures can be found on the NCH intranet.

NCH take a life-cycle perspective when determining, establishing and communicating environmental requirements to external providers including:

- Environmental requirements for procurement of products and services;
- Communicating environmental requirements to providers;

- Providing key environmental information on products and services in the context of the life cycle as and when required.

NCH has established documentation to assist its operational planning and control and these take the form of process maps, procedures, specifications, forms, records, data and other information across any media.

8.2 Emergency preparedness and response

NCH has established, implemented and maintains a procedure to identify potential emergency situations and potential accidents that can have an impact on the environment and how it will respond to them. This procedure can be found on the NCH intranet.

NCH will take all necessary action to eliminate or prevent all actual emergency situations and nonconformity. This has been addressed by the implementation of the preventative action procedure. In the unlikely event of an emergency NCH will respond to all actual emergency situations and accidents and will prevent or mitigate associated adverse environmental impacts.

NCH will periodically review and where necessary revise the emergency preparedness and response procedures in particular after the occurrence of accidents or emergency situations.

NCH will periodically test such procedures where practicable.

9 Performance evaluation

9.1 Monitoring, measurement, analysis and evaluation

9.1.1 General

NCH has established, implemented and maintains a procedure to monitor, measure, analyse and evaluate on a regular basis, the key characteristics of its operations and environmental performance that can have a significant environmental impact. The procedure includes the documenting of information to monitor performance, applicable operational controls and conformity with the organisations environmental objectives and targets. The procedure can be found on the NCH intranet.

CRMAMD ensure the outcomes of its evaluation of environmental operations and performance provide input to the management review. NCH ensures that it communicates information relevant to environmental performance both internally and externally as determined by the communications process and as required by our compliance obligations.

NCH ensure that calibrated or verified monitoring and measurement equipment is used and maintained and retains associated records.

9.1.2 Evaluation of compliance

NCH has established, implemented and maintains a procedure for periodically evaluating compliance with applicable legal requirements. This can be found on the NCH intranet. Records of the results of this periodic evaluation are maintained by the Business Transformation Team.

As part of this process, NCH evaluate compliance with any other requirements to which it subscribes. This evaluation is combined with the legal requirements evaluation mentioned above. NCH ensures that it communicates information relevant to environmental performance both internally and externally as determined by the communications process and as required by our compliance obligations.

9.2 Internal audit

9.2.1 General

NCH plans and conducts internal audits of the Environmental Management System at planned intervals according to the Internal Audit procedure. This procedure is called QMS-Procedure-03 and can be found on the NCH intranet.

The aim of the internal audits is to:

- Determine whether the environmental system conforms to planned arrangements for environmental management including the requirements of the International Standard.
- Determine whether the Environmental Management System has been properly implemented and is maintained.
- Provide information on the results of audits to management.

Internal audits are carried out by existing members of staff who have been suitably trained to conduct audits.

9.2.2 Internal audit programme

The audit programme is planned, established, implemented and maintained by the BIPM and takes into consideration:

- The environmental importance of the operations concerned.
- The results of previous audits.
- The risk associated with threats and opportunities.

The programme is delivered in accordance with the Internal Audit Procedure.

9.3 Management review

Top management, the BIPM and appropriate staff, review the Environmental Management System at intervals of at least once a year to ensure its continuing suitability, adequacy and effectiveness. The review shall include assessing opportunities for improvement and the need for changes to the system and to verify that the environmental policy and the objectives and targets are being satisfied.

The meeting is arranged and chaired by the BIPM. Attendees shall be Top Management and the BIPM. Other personnel may attend where necessary to provide relevant input at the discretion and invitation of the BIPM.

Items for the management review shall include, but are not limited to:

- Changes in significant environmental aspects,
- Risk associated with threats and opportunities,
- Results of internal audits and evaluations of compliance with legal and other requirements,

- Communication from external interested parties and complaints,
- Environmental performance,
- The extent to which objectives and targets have been met.
- Status of corrective and preventative actions.
- Follow-up actions from previous management reviews,
- Changing circumstances, including developments in legal and other requirements related to the environmental aspects.
- Recommendations for improvement to the environmental management system.
- Adequacy of resources required the effective maintenance of the EMS.

Management Review input items are discussed and used to assess the overall effectiveness of the Environmental Management System. Where inadequate progress toward objectives or goals or environmental performance is found, project plans or corrective actions are initiated to assure the situation remains visible for management. Management review outputs include any decisions and actions related to:

- Improvement of the Environmental Management System, and its processes,
- Improvement of product related to customer requirements,
- Resource needs.

The BIPM is responsible for minutes, including observations, conclusions and recommendations issued as a result of such review. Minutes of the meeting are approved by the attendees and retained as a quality record with all agreed actions monitored and results recorded and maintained.

The procedure that covers this is QMS-Procedure-04 and can be found on the NCH intranet.

10 Improvement

10.1 General

NCH has established and maintains records as necessary to demonstrate conformity to the requirements of the Environmental Management System and of the International Standard.

NCH has established, implemented and maintains a procedure for the identification, storage, protection, retrieval, retention and disposal of records, to ensure that all records remain legible, identifiable and traceable.

Records may be in any form or type of medium suitable for the needs of the company including computer data. Back-ups are made of all NCH databases on a nightly basis by the IT service provider.

The procedure that covers this is QMS-Procedure-02 and can be found on the NCH intranet.

10.2 Nonconformity and corrective action

NCH has established, implemented and maintains a procedure for actual and potential nonconformity and for taking corrective action. The procedure defines requirements for the following:

- Identifying and correcting nonconformity and taking action to mitigate their environmental impact.
- Recording the nature of nonconformity.
- Investigating nonconformity, determining their cause and taking actions in order to avoid their recurrence. If nonconformity does exist NCH will determine whether other similar nonconformities actually exist or could potentially happen within the scope of the EMS.
- Evaluating the need for action to prevent nonconformity and implementing appropriate actions designed to avoid their occurrence.
- Record the results of corrective actions and other actions taken.
- Reviewing the effectiveness of corrective actions and other actions taken.

NCH will ensure that any action taken shall be appropriate to the magnitude of the problems and the environmental impacts encountered. NCH will also ensure that any necessary changes are made to the Environmental Management System documentation.

The procedure for nonconformity is QMS-Procedure-07

The procedure for corrective action is QMS-Procedure-05

Both of these procedures can be found on the NCH intranet.

The term nonconformity can have several different meanings, and for the purposes of NCH, it includes the following:

- Buildings and properties which, for whatever reason, do not conform to minimum standards and are causing difficulties for customers. Operational procedures exist to ensure that problems are dealt with as soon as possible.
- Nonconformity to the Environmental Management System. This may take the form of non-adherence to procedures and instructions, or the procedures themselves may be obsolete, deficient or otherwise inadequate. This type of nonconformity should be found during periodic internal audits.
- Nonconformity in the services provided by NCH. This type of problem may manifest itself following a customer suggestion, a complaint or a council complaint. Customer feedback specifies the action to take in the event of a complaint.

A corrective action is that action taken to eliminate the cause of a detected nonconformity or other undesirable situation. Corrective actions are identified by the following:

- Internal audits (1st party audits).
- External audits (3rd party audits).

- Rectification Notices.
- Customer complaints.
- Environmental incident or near miss.

NCH also determines actions required to prevent or eliminate the cause of a potential nonconformity or other undesirable potential situation.

10.3 Continual improvement

NCH continually improves the effectiveness of its environmental management system and its environmental performance through:

- Effective application of the environmental policy
- Environmental objectives and targets
- Internal audits
- Data analysis
- Corrective actions
- Acting in advance to prevent incidents or accidents.
- Management reviews

The continual improvement process begins with the establishment of our Environmental policy and objectives for improvement, based on objectives contained in our business plan and customer targets and goals.

Customer satisfaction, internal audit data, process and product performance data, and the cost of poor quality or risk control are then compared against objectives or KPIs to identify additional opportunities for improvement.

The overall effectiveness of continual improvement program, including corrective actions taken, as well as the overall progress towards achieving environmental improvement objectives, is assessed through our management review process.