

Code of Practice

Waste and Recycling

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1. Purpose and Scope

This Code of Practice (CoP) details the University-wide arrangements and responsibilities for managing waste and recyclable materials. It applies to all streams generated by the University of Warwick, or across any of its managed estates. It also outlines expectations with respect to responsibilities, monitoring, training/awareness, auditing and Duty of Care, and communication.

This Code of Practice does not apply to the following:

- Domestic tenanted properties where waste is collected by local councils.
- Halls of Residence
- Genetically modified or biological waste
- Radioactive waste
- Asbestos waste
- All data-holding equipment, such as computers, mobile phones, and other devices

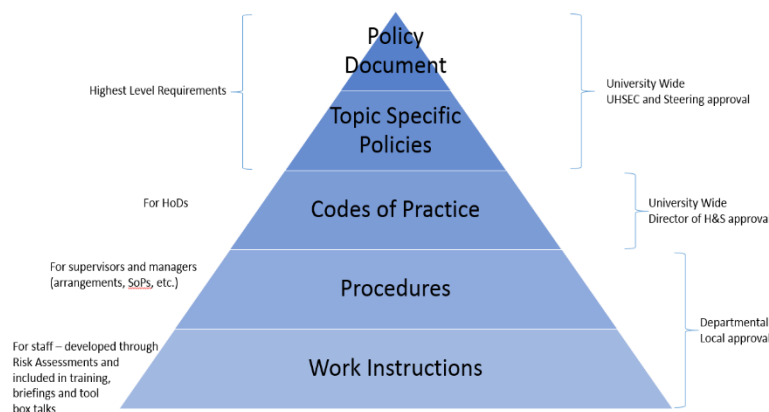
The objective of the management arrangements described within this code of practice is to ensure compliance with regulation and to protect employees, students, third party occupiers, contractors and the environment.

This CoP forms part of the Estates Environmental Management System and supports the University of Warwick Waste Policy. It should be read in conjunction with the Policy and the associated guidance on waste, which are available on the University's web pages.

In the case of lease or license arrangements, consideration must be given to the extent, access and proposed use of any space falling wholly or partially within the demise of the relevant lease or license. This applies to circumstances wherein the University is either landlord or tenant/occupier.

Departmental/Estates arrangements for all other aspects of the management of waste management are detailed in local procedures, including Standard Operating Procedures (SOPs) and Work Instructions, as indicated in the document hierarchy below:

Figure 1: Health and Safety Document Hierarchy



2. Introduction

There are several pieces of legislation, under health and safety and environmental law, relating to the control of waste which are relevant to activities carried out at the University of Warwick. The legal framework sets minimum standards for the protection of organisations, individuals and the environment from risks related to waste materials.

Waste should be prevented or minimised wherever possible:

- a. Sustainable procurement principles should apply to minimise generation of waste in the first instance.
- b. opportunities for reuse should be enabled when appropriate.

If waste cannot be avoided, the waste hierarchy should be applied:

- c. Recycling
- d. Recovery
- e. Disposal as a last resort

This CoP applies to and within all operations across the University. This CoP is supported by arrangements, instructions, and guidance, which are available on the University's web pages. Details can be found at point 5.0 References.

2.1 Definitions

A material is considered to be waste when the producer or holder discards it, intends to discard it, or is required to discard it. When assessing whether a material is waste or not, discarding doesn't simply mean throwing away or getting rid of something. Discarding also covers activities and operations such as recycling and recovery operations, which put waste material back to good use. Further information can be found on the [UK Government's page](#).

Waste is generally considered hazardous if it (or the material or substances it contains) are harmful to humans or the environment. Hazardous waste streams may include asbestos, certain chemicals (including solvents, brake fluid and print toner), pesticides, mineral oils, batteries, equipment containing 'ozone depleting substances' (such as fridges), biological waste, electrical equipment and components.

To determine if waste is hazardous:

- look to see if the waste (or the substances used) include orange and black danger symbols or red and white hazard pictograms to indicate they're hazardous; this may be on the item itself such as a chemical bottle or aerosol can or on the safety data sheet.
- check the List of Wastes code (or European Waste Code, EWC) associated with your type of waste; if it has an asterisk, it's hazardous.

Where classification depends on whether dangerous substances are present at or above certain levels you should refer to the [technical guidance](#) on waste, WM3, for more information.

Non-hazardous waste streams are further split into recyclable and non-recyclable.

2.2 Competence

The Duty of Care is a legal requirement for those dealing with certain kinds of waste to take all reasonable steps to keep it safe and is set out in the Environmental Protection Act 1990 (EPA). It applies to anyone who is a holder of household, industrial and commercial waste, known as controlled waste.

As a waste producer, the University of Warwick will ensure that key personnel should have a level of competence that allows them to make a suitable assessment of the activities to be conducted and what precautions are appropriate for the situation. Staff involved in waste management will be able to follow the below steps.

- Classify waste to check if it's hazardous.
- Separate and store hazardous waste safely.
- Use authorised businesses to collect, recycle or dispose of waste – check that waste carriers are registered, and waste sites have environmental permits.
- Fill in the parts of the transport documents that apply – keep one copy and give 2 copies to the carrier collecting your waste.
- Keep records (known as a 'register') for 3 years at the premises that produced or stored the waste.

All those involved in handling waste and using associated work equipment must be trained; that includes details on risk assessments and safe systems of works.

3. Requirements

3.1 Detailed plan of work

Each department producing, or likely to produce hazardous waste, must nominate at least one individual (a Nominated Person) to be responsible for assessment and coding, safe storage, transfer to authorized agents, production of Waste Transfer and Consignment Notes and the retention and maintenance of departmental records for hazardous waste.

3.2 Training Requirements

All staff managing the handling, storing or processing of hazardous waste must successfully complete the University's Hazardous Waste on-line training module at least once every three years, and Nominated Persons might be required to complete additional training dependent on the materials and equipment they might be responsible for. This Moodle can be found at point 5.0 References.

Records of all individuals' training shall be recorded and retained in accordance with the University Records Retention Schedule available via the link: [Information & Records Management \(IRM\) - Warwick](#)

Further details concerning available training is available on the University's Health and Safety web pages available via the link: [Health and Safety Training](#)

3.3 Storage

All waste must be stored in a safe and secure manner. To ensure this, all waste containers must be clearly labelled appropriate to the waste stream. Waste must be segregated whilst awaiting collection, to avoid unintended release or cross-contamination. All waste containers and storage locations should be in a good condition and of the appropriate types. Liquid wastes should be stored in sealed containers appropriate for the properties of the waste and placed in suitably bunded storage areas.

Wherever possible and /or applicable, access to waste containers must be restricted to the University's designated employees. Some contractors may be granted access to disposal points subject to permission, but they must implement appropriate waste management in line with the University procedures.

3.4 Transport

Waste produced by the University must only be transported off site for disposal by a registered upper-tier waste carrier, with suitable vehicles for the safe and secure transport of waste. The University itself has an upper-tier waste carrier's licence, which permits the University to carry waste. The University only carries waste between its sites to allow bulking-up at a central collection point prior to collection by the University approved waste contractors.

3.5 Monitoring

Waste Transfer Notes (for non-hazardous waste) and Consignment Notes (for hazardous waste) are statutory documents which must be provided and completed when transferring waste off site – there is a legal requirement for the University to keep Waste Transfer Notes for 2 years and Consignment Notes for 3 years. Waste Transfer Notes must be provided by the waste carrier and signed at the point of collection (unless it is a scheduled collection that is covered by an Annual Waste Transfer Note held by Estates Waste and Recycling Team). A Consignment Note must be provided by the waste carrier for the collection of hazardous waste and signed at the point of collection.

Waste production must be monitored in order to establish changes in reuse, recycling and reduction rates over time. Where possible the majority of waste produced on the estate should be monitored on a monthly basis through the pay-by-weight system currently provided by the University's waste management contractors. The monitoring and recording of waste data will be compared to objectives and targets set out in the Sustainability Strategy. Where waste arises as a result of developments or projects managed by contractors appointed directly by Schools or Departments, then the School or Department is responsible for ensuring that waste production is monitored appropriately. Details on the mass of waste should be shared with the Estates Waste and Recycling team for wider monitoring and measuring purposes.

3.6 Communication systems

Communication is an important part of effective waste management. Staff and students are provided with general information about recycling and waste procedures via the Waste and Recycling webpages: [Recycling](#). Schools and Departments must also communicate their local operational procedures for waste management to relevant staff and students. Progress towards targets (e.g. recycling rates) and

other waste-related information should be communicated to staff and students and actioned via the Sustainability Strategy.

3.7 Non-conformance

If this procedure is not applied, it will result in:

- A potential breach of legislation if waste is disposed of incorrectly, which could lead to contractors, consultants, or suppliers and the University incurring fines of up to £5000 in the magistrates' court and unlimited fines in a crown court.
- A failure to effectively control operations from which waste arises, with a potential for negative environmental impacts.
- Potential non-conformance with requirements of the Estates ISO 14001-certified Environmental Management System (EMS).

Departure from this procedure will result in the University taking action under the non-conformity procedure within the EMS, or further action as deemed necessary by the University.

4. Responsibilities

The principal responsibilities for the management of health and safety are stated in the University of Warwick Health and Safety Policy (with line management/delegation of duty described in the document 'Leadership and Management of Health and Safety at the University of Warwick') and complemented by a topic specific Policy for Waste Management. These documents are available via the [University's Health and Safety policy page](#).

This Code of Practice further clarifies the specific accountability and responsibilities held by roles within the University, in relation to waste management within **Appendix A**.

5. References

1. [Current Policies](#)
2. [Online Hazardous Waste training Moodle](#)
3. [Sustainability Strategy](#)
4. [Waste Management Policy](#)
5. [Confidential waste](#)
6. [Data Protection Policies](#)
7. [Climate Emergency Declaration](#)
8. [Estates Office Environmental Policy statement](#)
9. [Contractors Code of Practice](#)
10. [IT Equipment Disposal](#)
11. [Furniture Disposal Process](#)
12. [Student Life in Halls Handbook](#)
13. [Biological Safety](#)
14. [Asbestos Policy](#)
15. [UK Government's page](#)
16. [Technical guidance WM3](#)
17. [Information & Records Management \(IRM\) - Warwick](#)
18. [Health and Safety Training](#)

Appendix A

Responsibilities

A.1 Director of Health and Safety

The Director of Health and Safety is responsible for:

- Advising on the standards and regulations that must be achieved in order to meet legal requirements regarding hazardous waste
- Keeping the University's Health and Safety website up to date with the related hazardous waste policy documents and training moodles.
- Ensuring that spot checks and audits are carried out to provide assurance that activities are being carried out in compliance with policy and this Code of Practice.

A.2 Estates Director

The Estates Director is responsible, through support from the Director of Environmental Sustainability and Infrastructure for:

- The implementation of the University's Waste Policy regarding procurement of waste contractors, disposal of waste that is collected by Estates
- Ensuring that all records relating to the estate's operation and management of estates department waste are retained for the period stated in the University Records Retention Schedule.

A.3 Director of Environmental Sustainability and Infrastructure

The Estates Director of Environmental Sustainability and Infrastructure supported by their respective managers, is responsible for:

- Ensuring suitable resources and budget are available for the management of waste, including procurement of waste contractors and any associated equipment, Personal Protective Equipment and training for Estates staff;
- Escalating any non-compliance discovered or notified to them, to the Estates Director as the responsible person.
- The Director of Environmental Sustainability and Infrastructure is responsible for ensuring suitable resources are in place and to manage all records relating to Estates waste audits as well as conducting quality control through spot checks including records kept.

A.4 Head of Assurance, Risk and Property

The Head of Assurance, Risk and Property is responsible for the below, in relation to Estates related waste:

- Carrying out 'second line' audits of work and records.
- Escalating any issues to the Estates Director (the Responsible Person) and the Director of Health and Safety.

A.5 Heads of Departments

Heads of Departments are responsible for

- Complying with University policies, instructions and guidance regarding waste produced within, or by staff and students of, their respective departments.
- Ensuring that risk assessments carried out in their departments identify, consider, and address the hazards presented by the presence of waste or surplus materials.
- Ensuring appropriate Standard Operating Procedures are in place locally and aligned to University Policy and Statutory requirements.
- If they are producing, or likely to produce hazardous waste; nominating at least one individual (a Nominated Person) to be responsible for assessment and coding, safe storage, transfer to authorized agents, production of Consignment Notes and the retention and maintenance of departmental records for hazardous waste.
- Ensuring staff who handle waste are appropriately trained
- Ensuring that appropriate budget is available
- Ensuring that local quality control through spot checks and audits including records kept.

A.6 Waste & Recycling Manager (Estates)

The Waste and Recycling Manager is responsible, through support from the Waste and Recycling Assistant Manager and Supervisors for the below, in relation to Estates related waste:

- The contractual management and liaison between the University and its approved waste management contractors (with the exceptions of clinical, offensive, radioactive and asbestos contracts).
- The compliant and safe management and disposal of the UoW (University of Warwick) generated general waste and recyclables.
- Arranging daily support activities including, but not limited to, litter picking, litter bin servicing, external facility cleaning and road sweeping.
- Collecting specific waste from Schools and Departments when a Waste Disposal Request has been raised where applicable.
- Maintaining oversight of furniture disposals and bulky waste skips.

A.7 Campus Cleaning Services Managers

Campus Cleaning Services are responsible for:

- Collecting waste and recycling from internal recycling stations in office areas, classrooms, lecture theatres, teaching Laboratories, kitchens and toilets, in line with the approved Waste and Recycling processes.

A.8 Technical Services Managers

Technical Services staff are required to:

- provide support associated with laboratory waste disposal (in conjunction with Departments
- Oversee the provision of waste containment items
- Provide management and advice regarding the processing and disposal of chemicals
- Offer advice regarding materials with hazardous properties.

A.9 Estates Site Manager (Warwick Innovation Campus)

The Estates Site Manager (Warwick Innovation Campus, Stratford-upon-Avon) is responsible for:

- Fully engaging with the University Waste and Recycling Team and assist with any initiatives undertaking to improve recycling and minimise waste.
- Ensuring any actions resulting from audits are carried out under their direct management and control.

A.10 Project Managers and Those Who Commission Works

Project Managers and Those Who Commission Works are responsible for:

- Ensuring contractors are appointed and managed in accordance with the [University Contractor Management Policy](#) and [associated guidance](#).
- Ensuring that contractors have a waste management plan in place that is compliant with statutory legislation, University policy and the Code of Conduct for Contractors
- Checking that the contractor is registered to carry waste and has the correct waste carriers' licence before work commences.
- Reporting back to the Project Manager/Contracts Manager any non-compliance discovered or notified to them.

A.11 Maintenance Operations Staff

All directly employed labour staff (and any agency employees within the directly employed labour teams) within the Maintenance Operations Section will be required to:

- Comply with all relevant statutory requirements and these management arrangements when removing or disposing of waste.
- Follow safe systems of work as identified by line managers and supervisors
- Report to their line manager or supervisor any concern about any potential health and safety risk.

A.12 All Members of Staff

All members of staff (including agency staff) must cooperate and comply with the Waste Policy and these associated arrangements, instructions and guidance. It is the responsibility of all staff and students on the University estate to segregate and store waste in the appropriate containers at designated areas.

A.13 University Contractors, Consultants and Suppliers

The University Code of Conduct for Contractors is a document produced for contractors undertaking works in any area of the University. The code refers to guidance and legislation issued by the Health and Safety Executive and has details relating to the management of waste at the University; however, it is the responsibility of contractors, sub-contractors, consultants and suppliers to ensure compliance with current best practice and legislation

Appendix B – Assurance: Three Lines of Defence

