

Environmental Management System

Environmental Manual
EN-MAN VERSION 14.0

Oxford Brookes University

ISO14001 Environmental Management System Manual



Custodian and Review Panel

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0 Manual Overview

This manual outlines all written system procedures and provides information on where relevant system documents are stored, for the Oxford Brookes University environmental management system (EMS). The EMS uses ISO Standard ISO14001:2004 as its baseline for certification and has been updated to incorporate ISO14001:2015 transition changes.

The EMS is described here in terms of Planning, System Controls and Operational Controls and signposts to the detailed documents and procedures relevant to each element.

This document is intended to provide a standalone overview of the entire EMS and its interconnections; as well as providing signposts to more detailed information.

As and when the University's system evolves and may extend to other areas of Risk Management such as Quality and Health & Safety, this manual will be extended to encompass the relevant information.

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2 Definitions

APS	Activities, Products and Services
Accident	An incident that has resulted in actual injury, illness and/or damage(loss) to assets, the environment or third parties
Agreed Actions	Actions suggested by auditee and agreed with the auditor which will rectify the observations that are not in accordance with the audit criteria
Approved published location	The area of the University Intranet where pdf copies of approved documents are published for use by employees. The link to the approved published location is given in Annex 1.
Audit checklist	A list of questions on actions or items required by the audit criteria, used as an aide memoire during the audit to identify issues for action
Audit criteria	Policies, practices, aspects, procedures or EMS requirements against which the auditor compares collected audit evidence about the organisation's EMS.
Audit report	The auditor's report which includes the audit plan, checklists, forms, issues for action record, agreed action record and closing comments.
Audit scope	The aspect, procedure or other document, functional unit and location(s) to be checked.
Audit trail	A traceable link through EMS documentation demonstrating the completeness of documents and records.
Authorised Person	Manager, formally designated within the relevant FDD and given the authority for approving relevant MSD
CA&PA	Corrective Action & Preventive Action
Contract Supervisor	Member of University staff with specific responsibility for managing a contracted out activity
Contractor	An individual, partnership, company, corporation, association or other service, having a contract with FDD for the design, development, manufacture, maintenance, modification, or supply of items under the terms of a contract. E.g. Cleaner, Caterer, Builder etc.
Contractor supervisor/ Contract Holder	The person with overall responsibility for monitoring and managing the activities of an individual contractor as part of the formal contracting process

Controlled Copy	Documents listed in the EMS Document Index are considered to be controlled unless stated to be uncontrolled in the Index. Unless otherwise stated, the electronic version of the procedure or document located in the Approved Storage Location is the controlled version.
Controlled Reference Documents (CRD)	Documents of internal or external origin that are referred to in the MSD
Corrective action	Action taken to address an existing non-conformance, and to eliminate its cause(s) in order to prevent its recurrence.
Critical task	Tasks and activities which can cause significant impacts or are associated with significant aspects/threats.
Custodian/Owner	The person who is responsible for preparing a procedure and related documentation. Also for revisions and updates in consultation with Head of Environmental Sustainability
Disaster	Any event which prevents the University from carrying on its usual operations at the normal place of work for an unacceptable period of time.
EAP	Environmental Action Plans
Employee	All persons who are employed full time, part time or temporarily on University Campus, including both direct employees and outside Contractors
EMR	Environmental Management Representative
EMS	Environmental Management System
EMS Operational control procedures	Procedures for the operational control of critical aspects e.g. Waste, Materials & Resources etc.
EMS System procedures	Procedures for the management of the EMS itself.
EMSD	Environmental Management System Documentation
Environment	The surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans and their interactions
Environment Critical Tasks	Tasks which relate to significant aspects of the Institution's APS and for which System or Operational Control Procedures have been established.
Environmental aspect	Any element of the University's activities, products or services that can interact with the environment

Environmental impact	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from the University's environmental aspects
ERP	Emergency response plans/procedures
FDD	Faculty, Directorate (Department)
Findings	Results of the evaluation of the collected evidence compared against the audit criteria. These will form the basis of the audit report.
H&S	Health & Safety
HESA	Higher Education Statistics Authority
Incident	An unplanned event, or chain of events, which has (or could have) caused injury, illness and/or damage(loss) to assets, the environment or third parties
Institution	The total space within the University where the EMS is implemented and operated. The current status of this is outlined in sections 2.2 and 2.3
Issues for action	Observations of non-conformities that are not in accordance with the EMS audit criteria or which highlight a potential improvement to the EMS.
Key Auditee	The member of staff in the audit area responsible for liaising with the lead auditor during the organisation and execution of the audit
Lead Auditor	When an audit team is used, the lead auditor is the approved auditor designated responsibility for conducting the audit.
Linked documents	Documents, procedures and work instructions that form part of another University management system/process.
Local operational control procedures	Procedures within individual FDD that control critical aspects relevant to that individual functional unit. This may include local procedures providing more detailed instruction in relation to an EMS series system or operational control procedure.
Management Representative	Management Representative for Environmental Affairs, appointed by the University, to take responsibility for ensuring the effective implementation of the Environmental Management System. Currently the Registrar.
Management System Audit	A systematic and documented verification process to objectively obtain and evaluate evidence to determine whether an organisation's EMS conforms to the audit criteria set by the

	organisation and communicating the results of the process to management.
Management System Documents (MSD)	The Manual, System Control Procedures, Guidance Notes, Forms and related documents; and the Operational Control Procedures
MIP	Major Incident Plan
MIRG	Major Incident Response Group
MP	Management Programme
NC&CPA	Non-conformance, Corrective or Preventive Action
Non-conformance	Infringement of the requirements of the EMS, including failure to implement the policy, objective & targets, management programmes, system procedures, operating procedures and any related instructions
Non-conformance - CRITICAL	A non-conformance that will (or may) result in the breach of relevant legislation, non-conformance with the requirements of ISO14001, resulting in the loss of registration, direct and immediate threat to the environment or harm to the reputation of the Campus.
Non-conformance - MAJOR	A non-conformance that could result in a deviation from normal control of environmental impacts, or will increase the risk of an accident which could cause an environmental impact.
Non-conformance - MINOR	Non-conformances that are primarily administrative in nature
Non-conformance - Problem	A non-conformance that will (or may) result in the breach of legislation, non-conformance with the requirements of the ISO standards governing elements of the EMS, legal or other requirements, resulting in loss of registration, direct and immediate threat to the environment or harm to the reputation of the University.
Non-conformance (NC)	Infringement of the requirements of the EMS, including failure to implement the policy, objective & targets, management programmes, system procedures, operating procedures and any related instructions
Notification Record	Copy of memo or e-mail message issued to the core distribution list confirming that an approved revision of a procedure or document has been placed into the Approved Storage Location.

Notification Tree	Is as follows: 1. Anyone notifies Campus Services of the incident 2. Campus Services (if appropriate) notifies Director of Estates (DoE) 3. DoE (if appropriate) notifies Registrar 4. Registrar (if appropriate) calls out the MIRG
O&T	Objectives and Targets
Objective	Overall goal, arising from the policy and identified critical aspects/threat.
Operational Control Procedure	Written statement outlining the required method to be followed for critical tasks. This will include - standard operating procedures, work instructions, standing instructions, operating instructions and related guidance and forms, etc.
Personal Development Review	An annual process of evaluating an employee's development and training needs
Preventive action	Action taken to eliminate the causes of a potential non-conformance in order to prevent its occurrence
Programme Manager	Person assigned the formal responsibility for co-ordinating the development and implementation of an agreed management programme (this may also be the Responsible Person)
Relevant Interested Parties	Includes legal and regulatory authorities (local, regional, state/provincial, national or international), as well as other interested parties relevant to the environmental management as parent organisations, customers, trade associations, community groups, non-governmental organisations, neighbours, employees and others working on behalf of the organisation
Requirements	National and international legislation, regulation, permits, codes of practice, non-regulatory guidelines, local authority requirements, declarations, sector best practice, sector charters/agreements etc., legal licences and contracts etc. which are applicable to the Headington Campus, Harcourt Hill Campus, Wheatley Campu, Brookes managed halls of residence or to which the management of Oxford Brookes University have signed up or committed itself
Responsible People	Key managers and communicators within FDD and student accommodation responsible for disseminating information about the EMS to staff and collection data or information for the Head of Environmental Sustainability
Review Panel	The nominated person (or group of relevant internal interested parties) who will provide technical review of a procedure and

	related documentation prior to inclusion in the Approved Storage Location on the approval of the authorised person.
Significant environmental aspect	An environmental aspect that has, or could have, a significant environmental impact
ESM	Head of Environmental Sustainability
Source	The specific task, activity, equipment or component that gives rise to the aspect/threat. Sources may be from operational, administrative or other areas of activity
Stakeholder	All persons with legitimate interest in the performance of the University, including but not exclusive to: employees, students and other customers, neighbours, regulators, grant-making bodies, non-governmental organisations and the media.
Targets	Deadlines and/or quantifiable and measurable indicators to define stages and achievement of objectives
Third Party Audit	An audit undertaken by an independent, external organisation.
Uncontrolled Copy/ documents	Unless otherwise stated in writing on the document, all hardcopies are uncontrolled and are identified with a print date. Uncontrolled documents also include records, meeting notes, correspondence etc, unless a specific procedure requires that they are controlled.
University	refers solely to Oxford Brookes University

3 Context

Overview of University and Campus Activities

Dating back to the Oxford School of Art in 1865, and evolving via a number of institutions to become a University in 1992, Oxford Brookes has evolved into a modern University with Faculties of Business, Humanity and Social Sciences, Health and Life Sciences, and Technology, Design and Environment. With Campuses at Headington, Wheatley, Harcourt Hill and Swindon; and a variety of student residences and other facilities such as our extensive sports facilities and grounds. The University has around 2000 employees and 16,000 students.

It has a long standing reputation for employability, it is one of the UK's leading modern universities and enjoys an international reputation for teaching excellence and innovation as well as research excellence. The latest Research Excellence Framework (REF 2021) found that 97% of research at Oxford Brookes was internationally recognised or higher. It also found that 70% was judged to be of 'world leading' or 'internationally excellent' quality.

In delivering its activities, the University works within its guiding principles, the EMS is a key component of the delivery of these. The new University [Strategy](#) for 2035 is currently being drafted, sustainability is seen as a key 'enabler' in this strategy.

Values

In the development and nurturing of intellectual and enterprising creativity we make our highest contribution to society. Social responsibility demands that all aspects of our activity should be sustainable. Equality, inclusivity and the celebration of diversity must be the foundation for all we do. We will never be content with anything other than a wholehearted commitment to the quality of the student experience. We will continue to enhance the value - and the perception of value - of our social as well as educational mission.

The University's current values can be found at

<https://www.brookes.ac.uk/about-brookes/strategy/current-priorities-and-strategies/strategy-2020/>.

Vision

Oxford Brookes University will provide an exceptional, student-centred experience which is based on both internationally significant research and pedagogic best practice. We will build on a tradition of distinction in academic, professional and social engagement to enhance our reputation as a university which educates confident citizens characterised by their generosity of spirit.

Plans of the campuses are given in Annex 1, the University Organisational Diagram in Annex 2, Faculty Structure in Annex 3 and University Organisational Structure, Estates and Campus Services Management Structure and the University's Sustainability Structure are given in Annex 4.

Further information on the Strategic Goals and future plans of the University are given on the University web site At Oxford Brookes University our strategy is taking us forward to 2035 building on our strong track record for quality teaching, learning and research.

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Organisational Context

The University sector in the UK is in a period of change. The introduction of the annual fee and the removal of the student numbers cap has introduced large scale competition into the sector. All Universities are planning to expand, however, the reduction in total numbers of home students, general decrease in international students entering the UK due to measures to control immigration, the Brexit process, as well as the unprecedented challenges of the COVID-19 pandemic means there is much uncertainty in the sector. Further budget cuts, income loss caused by the pandemic, increased third party providers and the disbanding of the Higher Education Funding Council for England HEFCE will lead to further uncertainties in funding streams and the political context of the higher education sector.

Oxford Brookes University is well placed to meet these challenges and the changes these bring. It is one of the leading modern Universities with a number of world leading courses. We are working hard to manage our estates size through the 'Oxford Campus Vision' and the Estate Redevelopment Plan. The University sector is in a period of change a number of implications for the sector including the introduction to the Teaching Excellence Framework, giving degree awarding status to many different institutions and changes to the bodies governing the University Sector. An analysis can be found here <https://www.timeshighereducation.com/higher-education-white-paper-success-knowledge-economy>.

Societal expectations around sustainable development and the climate crisis have evolved with increasingly growing expectations on organisations to address their impacts on our global environment. The HE sector is considered to be in prime position to show leadership in environmental sustainability performance across our organisation and have the opportunity to educate and upskill our student body and undertake research and development required to meet the global climate and biodiversity crisis. The latest NUS survey reported 91% of students want to see Education for Sustainable Development (ESD) embedded across all their modules and 93% want to see it embedded in their institutional practises. There is much talk about the 'Green Recovery' with greenhouse gas emissions falling in the UK by 10% by the end of 2020, clean air coming back to our cities and the nation rediscovering our 'green spaces' due to the pandemic. It is vitally important that we address this crisis with the urgency required, recognise our wider impacts, embed positive sustainable change and empower our students to make positive changes on the next stage of their journey.

4 Scope of the Management System

The EMS covers external and internal aspects of the University's activities, products and services (APS) that have been judged to be significant on the basis of the assessment conducted in accordance with EMS System Procedure 7 – [Environmental Aspects System Procedure](#).

This assessment takes into account internal and external compliance obligations derived from an understanding of our interested parties, accounting for OBU's organisational units, functions and boundaries. Taking into account the interfaces, control and influence that the University has with a number of activities and associated organisations, Faculties, Directorates and Departments (FDD). In particular, consideration was given to the influence that the University has on: individual FDDs; the Student Body: its suppliers; and its contractors.

Scope of current certification

The Scope of the Environmental Management System Certification includes the Wheatley, the Harcourt Hill and Headington Campus, we extended the remit of our certification to include our Brookes managed Halls of Residence in 2019. Construction, demolition and refurbishment sites where legal responsibility for the area has been handed over to contractor/s (usually surrounded by an area of hoarding) are excluded from the scope of certification.

Environmental Policy

The institution's Environmental Policy is initially reviewed by the ECS Senior Leadership Team and signed off by the Vice Chancellors Group. It will be annually reviewed by the Environmental Sustainability Team to ensure its currency and applicability and signed off by the Vice Chancellor. Updates to the Environmental Policy are communicated internally via the staff News weekly highlights, all new staff receive a presentation on sustainability at Brookes which overviews the policy, this is available to all via the sustainability website. Students receive information about the environmental policy in the Student Unions welcome pack, which signposts them to the sustainability website; the SU have recently added sustainability pages to their website, which shares advice on how students can get more involved, visit <https://www.brookesunion.org.uk/sustainability>

<https://www.brookes.ac.uk/sustainability/environmental-management/>

The Head of Environmental Sustainability will determine if additional information should be disseminated to internal and external stakeholders on a case by case basis.

Relevant interested parties

The environmental management system also takes into consideration the needs and interests of relevant interested parties. Annex 6 records relevant interested parties, their needs and reporting requirements, these are reviewed at least annually to ensure we are adapting to change. The University will report relevant environmental data to these parties where we have committed to do so and where it is legally appropriate to do so, all reporting requirements are outlined in Annex 6.

5 System Design

To be functional and fit for purpose, the EMS must (transparently) be able to identify the significant aspects and impacts of the Institution's activities, products and services; prioritise them for action and control; control both the management system and the performance of the Institution in relation to its significant aspects; and, monitor and improve the performance of the management system.

The following sections outline how this will be achieved for our activities, products and services as defined within the scope of the EMS, as outlined in Sections 2.2 'Teaching' and 2.3 'Operational Management'.

6 Environmental Aspects System Procedure

The significant environmental aspects and impacts are established in accordance with this procedure. The aspects, impacts and scope are reviewed annually by the Head of Environmental Sustainability (or delegate).

Responsibility

The Head of Environmental Sustainability (or delegate) is responsible for co-ordinating an annual review of Aspects and Impacts for the EMS and will agree a review team comprising appropriate employees from relevant areas of the University's operations; the team will conduct the review in accordance with this procedure.

Procedure

Scope of the assessment and identification of activities

Review the scope of the previous assessment, and using current FDD operational (as well as academic) information and relevant registers, review the APS associated with the current operations to ensure that all applicable FDD activities have been incorporated.

It is important that planned "new projects" such as refurbishment, redevelopment etc. are included. The planning of new projects is carried out in compliance with EN101P Evaluation of Environmental Impacts Associated with Demolition, Construction and Refurbishment Projects

The outsourcing of APS to a contractor does not mean that such APS can be removed from consideration. The use of contractors brings other risks that require management within the EMS as well as obligations in relation to communications, training and monitoring. The Head of Environmental Sustainability (or delegate) monitors the compliance requirements and emerging legislation to ensure that any changes in legislation that might affect the significance rating of aspects is taken into account promptly.

The Head of Environmental Sustainability (or delegate) will ensure that, where necessary, existing Objectives, Targets and/or Environmental Management Programmes are amended to take account of any required changes; and/or new Objectives, Targets and/or Management Programme are established.

Identifying Aspects and Impacts

APS aspects and associated risks/impacts will be considered under all the following modes of operation in the Aspect Register:

- Normal day to day operations
- Abnormal operations (e.g. special projects, maintenance, refurbishment etc.)
- Potential accident and emergency situations (e.g. power failure, flood, fire, spillage etc.)
- Historical and future (planned) situations

For each APS its potential or likely impacts for the following areas are accessed:

- Controlled and uncontrolled releases to atmosphere
- Controlled and uncontrolled releases to water
- Waste generation and management
- Contamination of soils and groundwater (e.g. from leakages and spills)
- The use of raw materials and natural resource (including the storage use and handling of materials etc)
- Nuisances (e.g. noise, odour, dust, vibration, visual impact etc) as well as other impacts on local communities, biodiversity, human health and eco-systems.
- Life cycle implications
- Future trends and risks

Assessing the significance of Aspects and Impacts

All identified Aspects and Impacts have a significance assessment undertaken using the matrix and criteria given in [Aspects Register](#), outlined in Tab 2.2. The results of the assessment are recorded Tab 1.1. This Tab constitutes the Register of Significant Aspects.

Summary data on the existing controls associated with an identified Aspect/Impact are included.

The significance assessment prioritises Aspects as follows:

- Top – immediate action is required to address impacts
- High – specific objectives, targets and programmes for improvement are to be set
- Medium – to be managed through operational controls (e.g. physical and/or procedural)
- Low – to be monitored as part of annual review but does not require specific control or active management.

Where immediate action or objectives and targets etc. are not implemented for High and Top priority Aspects, the justification for this will be documented.

Review

The University's Aspects and Impacts will be formally reviewed each year. The review will take into account any new FDDs, operations or activities or locations, or changes in the levels of existing operations. During the review, the University will consider any projects or programmes associated with objectives and reassess their significance rating of relevant environmental aspects. Where new aspects are evaluated and rated High or Top, action will be taken in accordance with the above.

New aspects may be added or full formal review initiated at any time if the Head of Environmental Sustainability or delegate considers the inclusion necessary due to Environmental incidents, legislative review, changes to University policies or changes in University operations/ campuses. The Head of Environmental Sustainability (or delegate) will

carry out an ongoing review of the significance ratings to reflect changes in legislation, University policies or other requirements and will adjust the EMS accordingly.

New significant aspects of projects are identified in section 8 – Legal and other requirements.

Responsible People for a FFD will be given an opportunity to comment on any new aspect or impact that affects their FFD. Any changes identified as a result of application of Legal and other requirements (section 7) will be updated in the [Aspects Register](#) EN002D1 by the Head of Environmental Sustainability or delegate.

7 Legal and other requirements

The University uses the Legislation Update Service to ensure legal compliance. Monthly newsletters are currently circulated to all users. Legislation, regulation, standards and other relevant requirements, pertaining to environmental performance and control that are applicable to the University have been identified and periodic compliance checks are undertaken.

Responsibility

The Head of Environmental Sustainability (or delegate) is responsible for ensuring that this procedure is carried out and may assign responsibility for maintenance of information relevant to specific FDDs to appropriate Responsible People.

Procedure

Identification of “Requirements”

The Head of Environmental Sustainability will identify and maintain the University’s membership of an appropriate legislation update service to ensure that information on new and amended legislation and other requirements is received in a timely manner.

Review and update of “Requirements”

As a minimum, an annual review will be co-ordinated by the Head of Environmental Sustainability (or delegate) to ensure that information and copies of permits, licences etc. are current and valid. Permit/licence holders will notify the Environmental Compliance Officer when permits are renewed in order that the Requirements register can be updated. Annual checks are carried out to ensure compliance with these requirements. A copy of the updated permit/licence will be sent to the Environmental Compliance Officer.

Where updates and/or amendments are identified the Environmental Compliance Officer will send a periodic summary to relevant personnel to ensure that they are aware of what “Requirements” they are required to comply with.

Storage and access to information about “Requirements”

Copies of any authorisations, permits and licences relating to relevant activities on the University will be held by the Environmental Compliance Officer, where they are stored in a Permit, Licence and Consents database. The originals will be kept by the permit/licence/contract holder.

The Head of Environmental Sustainability (or delegate) will determine which of the "Requirements" it is necessary to have in hard copy text. These documents will be stored in an appropriate controlled library.

8 Compliance Evaluation System Procedure

Compliance with applicable legislation and regulation is monitored regularly by the Environmental Compliance Officer. Any major non-compliances that might have legal or reputational impacts upon the University are reported to SLT and VCG if required; others are acted upon by the Head of Environmental Sustainability (or delegate) as required to bring the University back into legal compliance. A formal assessment of compliance will be initiated by the Head of Environmental Sustainability at any time that s/he considers a potential problem may be (or is) occurring. Auditing of legal compliance across each site will be carried out over a three year cycle as a minimum.

Responsibility

In addition to the responsibilities outlined in Internal EMS Audits (section 20) , the Head of Environmental Sustainability or delegate is responsible for –

- Preparing and implementing a programme of compliance evaluations and defining the scope of such evaluations;
- Co-ordinating the preparation and updating of checklists of relevant "requirements" to facilitate consistent auditing;
- Reporting the results of compliance evaluations to Estates and Campus Services Senior Leadership Team and then the Vice Chancellors Group;
- Where necessary, timely reporting of any legal non-compliances to the appropriate Regulator;
- Where necessary, ensuring that relevant procedures are updated in line with revised legal requirements or the findings of compliance evaluations.
- The responsibilities of the auditor, key auditee and faculty/department line management are defined in procedure Internal EMS Audits (section 20)

Procedure

The Compliance Evaluation Cycle

All elements of legal requirements will be evaluated once per year for each relevant FDD at the very least. Monthly legislation newsletters are currently circulated to all users. Legislation, regulation, standards and other relevant requirements, pertaining to environmental performance and control that are applicable to the University have been identified and periodic compliance checks are undertaken.

Elements of all "other requirements" will be evaluated at least once every three years, unless more frequent evaluation is specified as part of the requirement. Responsible People and line

management may request evaluations of their areas of responsibility whenever they consider that an evaluation would be of benefit. Taking account of evaluation reports, any amendments to legal and other requirements and the operational plans for the Campus, the Head of Environmental Sustainability (or delegate) will review and where necessary update the audit cycle on an annual basis.

The Head of Environmental Sustainability (or delegate) may use internal resources (including competent students) or may commission an external third party to evaluate all or any of the legal and other requirements. Where an external party is used, the Head of Environmental Sustainability, in consultation with the Management Representative, will determine the scope of such an external evaluation.

Preparing compliance evaluations programmes, assigning auditors and scope

Each detailed evaluation programme will define –

- The FDD(s) or campus to be audited
- The scope of each evaluation
- The month of the evaluation completion
- The lead auditor and any audit team member(s) if required
- The key auditee¹ (if applicable), and
- A technical advisor, where requested.

The relevant Responsible Person will be notified of the evaluation programme to enable them to plan resource requirements and facilitate the evaluations. Any relevant employees (including contractors/ sub-contractors) who may need to be involved in evaluations should be notified by line management.

The Environmental Compliance Officer will notify auditors of their programmed evaluations and due dates and will monitor their completion.

Guidance on requirements

The Environmental Compliance Officer will co-ordinate the preparation and updating of checklists and/ or guidance on the relevant "requirements" to facilitate consistent auditing. These will be updated in alignment with the annual review of requirements outlined in section 7.

Auditor Competence

The requirements of procedure [Internal EMS Audits](#) will apply

Planning, conduct and reporting of compliance audits

¹ Certain requirements/ procedures may require that different auditees are interviewed for different parts of the requirement/ procedure

The requirement of [Internal EMS Audits](#) will apply as relevant to legal compliance auditing (i.e. clauses not of relevance will be ignored). Where compliance with legal or other compliance requirements involves controls via procedures, work instructions etc. the auditor will review the relevant procedures to assess whether they are consistent with the current requirements. If the requirements have changed (e.g. legislation has been updated), specific recommendations should be made as to how the relevant procedures need to be updated.

As part of planning or follow up of the compliance audit, the Auditor may contact relevant regulator(s) or the organisations responsible for “other requirements” in order to obtain further information or their views on the relevant element/aspect under audit. Where the auditor wishes to do this they must consult the Head of Environmental Sustainability (or delegate) first in order to agree the approach.

Reporting non-conformances

Where the compliance evaluation finds non-conformances, these will be reported in accordance with procedure [19 – Incident Investigation, non-conformance, corrective and preventive action](#).

9 Objectives and Targets system procedure

This procedure describes the actions and responsibilities associated with the setting and maintenance of objectives and targets (O&Ts) for each Top or Highly significant aspect; and for the establishment of relevant Strategies / Action Plans / Management Programmes aimed at achieving the identified O&Ts.

Responsibility

The Head of Environmental Sustainability (or delegate) is responsible for co-ordinating the development, review and progress monitoring of strategies (vision, key drivers & objectives), action plans (objectives & targets) after consultation with relevant FDD's. Where necessary s/he will involve internal specialists to advise on or develop O&Ts; as well as FDD personnel as necessary.

The Director of Estates and Campus Services is responsible for the approval of identified O&Ts, these are then taken to the SLT for consultation and approval, then to the Vice Chancellor's Group (VCG) for final sign off, in line with University policies.

Responsible persons and/or Programme Managers are responsible for co-ordinating and implementing Strategies and Action Plans to achieve their particular assigned objective(s) and/or targets and/or Management Programmes, as applicable.

Procedure

Identification of O&Ts

As a minimum, on an annual basis the Head of Environmental Sustainability (or delegate) will co-ordinate the establishment and documentation of new/revised University/Campus-wide and FDD O&Ts. These O&Ts will focus on the control, reduction or elimination of critical aspects/threats, and will be based upon the requirements of:

- The current environmental and other policies/strategies as identified in Section 3;
- The identified critical aspects listed in the up to date Aspects Register;
- The identified legal and other requirements;
- The outcome of management systems and compliance audits (internal and external) and the formal Management Review;
- The views of stakeholders; and
- University business and operational goals.

Objectives will have nominated Responsible People and where appropriate, quantified targets.

Apportionment of Targets

Where appropriate, it may be necessary to apportion responsibility for achievement of targets between different FDDs. The Head of Environmental Sustainability (or delegate) will agree with the relevant Responsible People how a target is to be apportioned.

Documentation of O&Ts

The Head of Environmental Sustainability (or delegate) will ensure that O&Ts are listed and their progress tracked using an annual target review through the Actions Plans. This will be revised at least annually in line with the review and update of O&Ts. Progress on Objectives and Targets are reported annually to SLT and the Vice Chancellor's Group in the Annual EMS report.

Achievement of O&Ts through specific Action Plans:

The Head of Environmental Sustainability (or delegate) will co-ordinate with the Responsible Persons to create Action Plans to deliver the objectives in the Environmental Strategies.

Current documented Action Plans are:

- Travel Plan (new plan to be delivered by spring 2023)
- Interim Carbon Strategy & Action Plan
- Biodiversity Action Plan
- Waste Action plan
- Water Action plan
- Sustainable Food Action Plan
- Communication Plan
- New Sustainability Engagement Action Plan (draft)

Programme Managers will notify the Head of Environmental Sustainability or the Environmental Compliance Officer of the results of progress meetings in order that the KPI documents - can be updated; and any significant barriers to progress examined and removed.

The Head of Environmental Sustainability (or delegate) will monitor the results of evaluations of new projects, process changes and maintenance to identify where existing Strategies/ Action Plans may require amendment. Where amendment is considered necessary the Head of

Environmental Sustainability will discuss this with the relevant Programme Manager and agree to the changes.

Progress Monitoring and Reporting

The Environmental Compliance Officer will undertake ongoing, overall, monitoring of actions to ensure that programmes are being properly managed and continual improvement is assured. In addition to this and the notifications provided by Programme Managers, the Head of Environmental Sustainability (or delegate) will hold a periodic progress meeting (at least once per year) with all Programme Managers of current Action plans. On at least an annual basis the Head of Environmental Sustainability (or delegate) will co-ordinate identification or calculation of the current status of performance indicators, where applicable. Progress in achieving O&Ts, and relevant performance indicators will be reported to the Estates and Campus Services Director, SLT and VCG.

Review and modification of O&Ts

The Head of Environmental Sustainability will review the O&Ts annually, using as a guide:

- The results of the annual review of critical aspects/ threats
- New critical aspects/ threats identified from new projects, process changes and maintenance etc.
- The requirements of the current environmental (and associated) policies & strategies
- The results of progress monitoring of O&Ts and action plans.
- Feedback and comments made by stakeholders
- Changes in operational or organisational circumstances
- Individual PDR objectives for sustainability team members.

Where required, the Head of Environmental Sustainability (or delegate) will develop and propose to SLT and the FDDs new and/or revised O&Ts in line with clause 6.1.

10 Environmental Action Plans

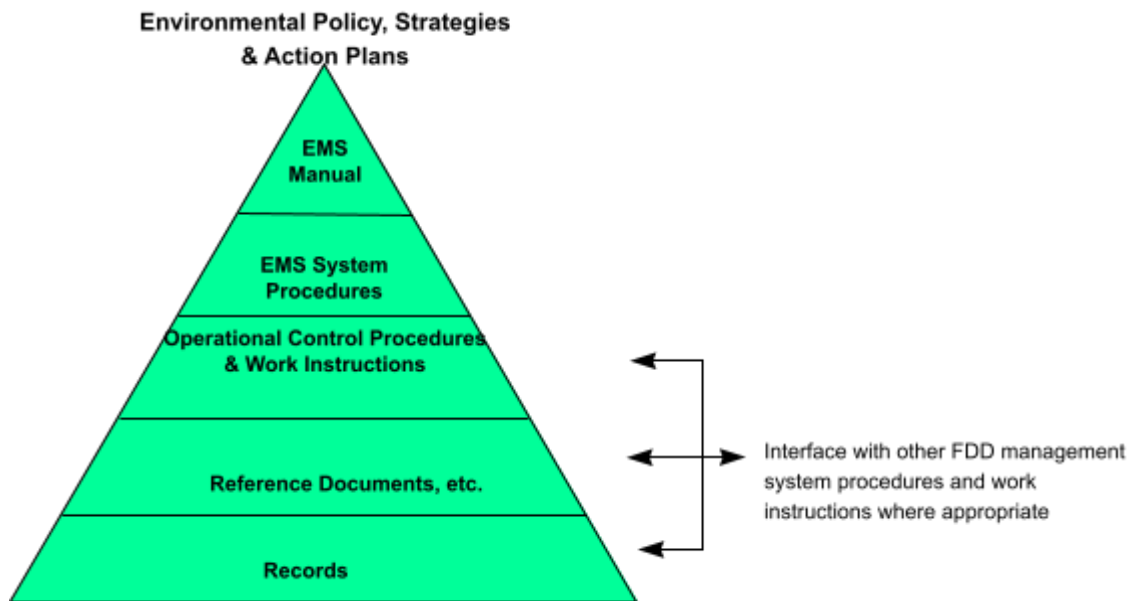
The objectives and targets of the EMS are recorded in the annual target review EN003D1. Key objectives and targets that require detailed plans such as Transport, Biodiversity, Sustainable food, Water, Waste or Carbon reduction have Environmental Action Plans created for them.

Progress in achieving the objectives and targets is monitored regularly by the Head of Environmental Sustainability (or delegate) and reported to SLT then VCG and communicated to internally and externally via the Sustainability website.

11 System Documentation

The EMS is documented in the hierarchy of documents outlined in Diagram 1 below.

Diagram 1. EMS Documentation (EMSD) Hierarchy



Key:

Environmental Policy

Defines the strategic environmental direction of the University and sets the long term vision for management and control. It acts as the driver for the rest of the system.

Environmental Strategies and Action Plans

Define the short to long term goals that the University wishes to meet in order to achieve the policy and improve environmental performance and control. These are being updated and will be documented in our environmental strategies. The Environmental Action Plans define our high level targets (KPIs), actions, owners and timeframe for delivery.

EMS Manual

This document describes the scope of the EMS; the organisation, roles, responsibilities and authorities; and outlines the critical elements of the system for conformance with the ISO14001:15 Standard.

EMS System Procedures

Defines the actions and responsibilities associated with the management of the EMS itself. Describes who does what, when, where and how. (integrated into the EMS manual)

Operational Control Procedures & Work Instructions

Defines the actions and responsibilities associated with operational control of Institution wide activities associated with environment critical tasks. For local activities², Operating Procedures and Work Instructions are located and managed within each FDDs management system and documentation process. These are signposted from the EMSD where relevant.

² i.e. those related to only one FDD

References Documents etc

These provide background information to support the functioning of the EMS, its System Procedures and the Institution's Operational Control Procedures. They are referenced from individual Procedures and Work Instructions.

Environmental Records

These are records generated by conformance with the EMS and form objective evidence for examination during EMS and compliance audits. They may be formal records of conformance or informal logging of information.

12 System Implementation - Responsibility and Authority

The organisation for the overall management of activities and operations at the University is shown in Annexes 2 and 3. The responsibilities and authorities for environmental management and control is principally through the normal line management functions and are vested at two levels - those with University (or Campus) wide responsibilities and those with responsibilities within their FDD.

University/Campus wide Responsibilities:

A) **Vice Chancellor's Group**

Top Management are formally responsible for the EMS in the case of the University this is the members of the Vice Chancellor's Group.

B) **Director of Estates and Campus Services**

- Securing the resources (financial, technical, human and logistical) required to implement and maintain the EMS.
- Ensuring the EMS is established, implemented and maintained in accordance with the Standard(s) to which it is certified.
- Monitoring the performance of the EMS, in delivering improved environmental performance by the University.
- Establishing, reviewing and revising the institution's environmental policy, objectives and other elements of the EMS.

C) **Head of Environmental Sustainability.**

The Head of Environmental Sustainability has the responsibility for ensuring the effective implementation of the EMS; and for reporting to the Director of Estates and Campus Services (ECS), the ECS Senior Leadership Team and the Vice Chancellor's Group on the performance of the system and the environmental performance of the Institution. In addition:

- approves the Environmental Management System Manual;
- approves the Environmental Policy and strategies;
- approves the Institution wide operational control Procedures related to environmental control; and
- approves the Environmental Management System Procedures;
- ensures the implementation of the EMS

D) The Environmental Sustainability Team

Members of the environmental sustainability team shall meet regularly with the community engagement and social responsibility team manager. Roles of the team include :

- Discuss the implementation and maintenance of the EMS to ensure that it is fit for purpose and functional
- Devise and promote initiatives to inform interested parties about the EMS and the University's performance.
- Help the Head of Environmental Sustainability to periodically audit compliance with the EMS and with applicable legislation etc.
- Conduct any other reasonable tasks as required by the Head of Environmental Sustainability in relation to the EMS

13 FDD Responsibilities -

A) People Directorate Business Partners

The People Directorate Business Partners, partners with each Faculty or Directorate. They are responsible for liaising with the Head of Environmental Sustainability and coordinating the identification of relevant training needs by the FDDs; the establishment of learning opportunities to meet needs identified.

B) Heads of FDDs

For their FDD, responsible for ensuring the implementation of the EMS requirements; in particular, compliance with relevant legislation and applicable Operational Procedures.

Also, within the context of the University or Institution wide objectives and targets, responsible for developing local, subsidiary, environmental objectives and targets, where appropriate. Assignment of responsibility for development and implementation of relevant environmental management programmes.

C) Heads of FDD or responsible people

For their FDD, responsible for ensuring that relevant elements of the EMS and required operational controls have been implemented in accordance with EMS Procedures. Specific responsibilities include:

- approval of FDD level standard Operating Procedures and Work Instructions;
- ensuring implementation of environmental controls including relevant Operating – Procedures and Work Instructions;
- ensuring that staff are aware of the environmental requirements of tasks assigned to them;
- ensuring that a training needs analysis is undertaken and that appropriate training is provided to relevant staff to ensure their competence;
- raising the awareness of staff regarding the EMS and related environmental issues, and facilitating feedback (both positive and negative) to the Head of Environmental Sustainability (or delegate);
- facilitating EMS audits and chasing/close out of agreed corrective and preventive actions.

Where relevant, responsible for ensuring that:

- environmental evaluation is undertaken during the planning of new projects, process changes and maintenance, including liaison with, and involvement of, the Head of Environmental Sustainability where necessary;
- environmental requirements and controls have been fulfilled upon completion of projects.

D) Contract Manager/Supervisor

Responsible for the on-site supervision of contractors; and ensuring that contractors operate in conformance with the environmental requirements contained within University or Institution wide and FDD Operating Procedures and Work Instructions; and in compliance with legislation that applies to their activities.

Where required, or necessary, copies of operational control records, incident reports and other relevant documentation are provided to the Head of Environmental Sustainability.

E) All Staff and Students (permanent, temporary, visiting and contracting)

Responsible for:

- compliance with all EMS and relevant FDD Operating Procedures and Work Instructions;
- providing copies of environmental records as required by relevant System and Operational Control Procedures;
- general good housekeeping, waste management, energy efficiency, pollution prevention and materials/substance control practices;
- feedback on environmental incidents and non-compliance with environmental procedures and requirements; and facilitating EMS audits.

EMS oversight and organisational structure

The Director of Estates and Campus Services has an operational oversight of the EMS

Resources

Resources for effective environmental management include personnel, technology and capital/revenue expenditure.

Resources required for environmental management are assigned through the normal University business management approach as part of a planned programme of development, implementation and improvement of the EMS; operational control of significant environmental issues; and monitoring of environmental performance.

The application of resources to environmental management and control is tracked through the University's normal equipment, personnel and accounting mechanisms.

All University staff undergo an annual Personal Development Review by their line management against the requirements of their job grade. Staff are selected for tasks by comparison of their competencies, training and experience against the skills and competencies needed for the task. Key competencies required by jobs and tasks can be found in the relevant procedures and the training needs matrix. Where tasks are not assigned to a particular job function an evaluation of competencies is undertaken prior to assignment of the task.

Staff assigned tasks with environmental or EMS requirements are provided appropriate training and awareness raising to ensure that they are competent to undertake the tasks assigned to them.

Resources are input to the FDD training functions to ensure that relevant environmental issues are integrated into normal training activities for each relevant FDD.

Interface with other University Management Systems

The Environmental Management System forms one part of the overall structure of management of the University and its Institutions; it interfaces with various formal and informal management systems on site. These are outlined in [Annex 5](#). In order that environmental issues should be part of routine business management, wherever possible the EMS is integrated into existing management structures such as those for procurement, contracting, and human resource management. To avoid duplication, the EMS documentation will signpost to Procedures, Work Instructions, documentation and other reference material incorporated within other Institution systems.

Unless specifically identified within the EMS Index, documents that form part of other Institution management systems are managed and controlled under the requirements of those systems.

14 Training, Awareness and Competence

Responsibility

The Head of Environmental Sustainability or delegate is responsible for –

- Identifying the personnel and/or roles that involve critical tasks and ensuring training needs are identified and met.
- Initiating an annual training needs analysis, identification and co-ordination of learning provision, and recording of learning events undertaken.

In delivering these responsibilities, s/he may liaise with and/or assign elements of this to other appropriate Departments (e.g. HR, and line management of FDDs).

The Head of Environmental Sustainability or delegate will conduct an annual review of employee's environmental training needs. The results will be feedback to Responsible People for dissemination to Line Managers. The training needs of individual employees will be reviewed as part of employees annual Personal Development Reviews.

The Contract Manager is responsible for ensuring that contractors (and other third parties working on behalf of the University) are provided with the appropriate information, procedures and awareness related to Critical Tasks to which they are assigned.

Procedure - Training Requirements

All employees

New employees will undertake an appropriate environmental induction training as part of the health and safety training in their first 6 months of employment. Employees who undertake

Critical Tasks will be provided with additional training to ensure their competence and understanding of:

- requirements of the environmental policy, strategies and management system
- requirements of relevant Operating Procedures and Work Instructions associated with significant aspects of their activities (including for emergency preparedness and response)
- individual roles and responsibilities for environmental control and performance
- consequences of non-conformance with requirements
- reporting of non-conformances and "near miss" situations

The training requirements of staff for Critical Tasks will be disseminated to Line Managers from Responsible People as outlined in section 4. The EMS Standard Operating Procedures (SOPs) and Work Instructions (WIs) associated with these critical aspects are available under [Operational control procedures](#) and [work instructions](#).

Contractors

Where contractors undertake critical tasks, the Contract Manager will identify the OPs/WIs that must be complied with and will ensure that the contractor has an up-to-date copy of relevant documents and has indicated their understanding of the requirements as per the Contractors handbook.

The Contract Manager will require the contractor to ensure that contractor staff, working on the University's Headington Campus, Harcourt Hill Campus and Wheatley Campus, are competent to undertake critical tasks assigned to them.

Relevant Student Representatives

Relevant student representatives can be provided with optional sustainability training by the sustainability team when staff members responsible for the students' training arrange it with the team.

Training Needs Analysis

An initial training needs analysis will be undertaken during the probationary period of new employees. Line managers will review the requirements of critical tasks against each employee's job requirements, declared competencies and performance evaluation and will identify skills/performance gaps/weaknesses providing feedback to the HR Department as part of the PDR.

On an annual basis, the Head of Environmental Sustainability (or delegate) will review the Training Matrix to evaluate the different/changing roles of employees, in order that the Responsible People can disseminate the new training requirements to Line Managers, to implement within employees annual PDRs.

When training requirements are identified they are recorded in the Training Programme Outline for the Current Period ([EN004D2](#)).

Tracking Employee Competence and Training

The completion of the induction training will be confirmed by the receipt of attendance sign in sheets.

Where training has been completed it is the responsibility of the employee's line manager to assess their compliance, with advice from the sustainability team, as required. Where deviations from requirements are identified, line managers must instigate corrective actions through guidance, 1:1s and other management techniques in line with guidance from HR.

15 Communications

This procedure applies to all external communications to interested parties related to the items below, regardless of their source:

- The environmental management system and its individual elements
- Environmental management performance
- Environmental management control
- Emergency planning and preparedness

This procedure also applies to internal communications to interested parties which may relate to:

- Environmental management performance
- Environmental management control
- Feedback on environmental issues and performance
- The requirements of the Environmental Management System; and
- Employee responsibilities in connection with above.

Responsibility

External Communications

The Head of Environmental Sustainability (or delegate) is responsible for advising on communications arising from outside Oxford Brookes University which impact upon the performance of the Environmental Management System. A formalised [Communications Plan](#) is currently in place. Dependent upon the nature of the communication and the type of stakeholder, responses to external communications will be made in liaison with relevant responsible people, the Community Engagement and Social Responsibility Team or FDD representatives.

The current process for external communication, includes the following:

- Annual Sustainability Report.

- Sustainability Website (updated / reviewed at least annually)
- Social Media
- Sustainability@Brookes email – advertised through the website.
- External environmental networking groups – Oxford Good Food, Oxford Green Week, Green & Blue Oxford, Low Carbon Oxford.
- FOI requests – on request.

The Social Responsibility and Community Engagement Manager, the Accommodation Bureau and Brookes Sports are responsible for recording external complaints received.

Internal Communications

FDD line management and Responsible People are responsible in the first instance for encouraging, initiating, handling and responding to internal communications from staff, in particular in relation to the Environmental Management System. Where further information or clarification is required this will be obtained from the Head of Environmental Sustainability

The Head of Environmental Sustainability and delegates are responsible for handling communications with FDD line management co-ordinating the dissemination of key information down to line management and employees / responsible people.

Procedure – External Communications

Requests for information from external stakeholders will be forwarded to the Head of Environmental Sustainability via email. Hard copy requests will be sent to the Environmental Sustainability Team, John Payne Building, Gipsy Lane Site, Oxford Brookes University, Oxford, OX3 0BP.

Where practical, requests will be evaluated by the Environmental Sustainability Team within 5 working days and where approved information will be provided and/or action taken; where declined an appropriate response will be made to the originator. External requests for information will be evaluated on a case by case basis to determine if staff members outside of the Sustainability Team need to be involved in responding to the originator.

Freedom of Information or Environmental Information Regulations requests will be responded to within the deadline specified by the regulation or request.

Complaints received from members of the local community to the University are managed through the complaints procedure that can be found online. The number and nature of complaints received by the Directorate of Marketing and Communications are reported in the annual Community Engagement Reports.

Dissemination of information

The University's sustainability performance will be reported on in the form of an annual sustainability report that is publically available on the website. This report will include where possible information for relevant "Interested Parties".

The environmental policy, strategies and annual action plans will be made available to third parties via the University [Sustainability website](#). The Head of Environmental Sustainability will determine if other information should be disseminated to external stakeholders on a case by case basis.

Responding to Internal communications

Responsible People will encourage employees to communicate and provide feedback about Environmental management performance; Environmental management control; feedback on environmental issues and performance; the requirements of the Environmental Management System. Where line management is not able to respond adequately to communications from employees, the communication will be directed to the Head of Environmental Sustainability (or delegate).

The Head of Environmental Sustainability (or delegate) will evaluate the communication and provide the appropriate information or response.

Where communication to the Head of Environmental Sustainability (or delegate) is received directly from employees, the Head of Environmental Sustainability (or delegate) will liaise with the employee and/or relevant FDD line management/ Responsible Person, where necessary, to determine the appropriate response and means of communication with the employee(s) concerned.

Disseminating Information

The Head of Environmental Sustainability (or delegate) shall ensure the provision of appropriate and up-to-date information. This information will include:

- The Environmental Policy
- Objectives and targets - Strategies & Action plans
- Critical aspects - appropriate interested parties within the FDD's
- Environmental performance - Annual EMS report, Sustainability report, Action plans.
- Requirements of control procedures – on a FDD appropriate scale
- Feedback from monitoring and measurement, management systems audits and management review – to appropriate management representatives within each FDD.

In addition to verbal/written information disseminated through line management; information will be communicated by the Environment Sustainability Team to employees via appropriate communications tools, including:

- Sustainability website (www.brookes.ac.uk/sustainability/)
- The staff online newsletters
- Mail forums including – envforum@brookes.ac.uk,
- Relevant pages on the University Intranet Web and Twitter

- Internal newsletters and/or leaflets
- Notice boards, On-Campus TV screens, and stalls located in public areas
- Reports to Management
- Social Media
- Team briefings and campaigns
- Key contacts lists

As required, the Head of Environmental Sustainability will notify critical information affecting control of the EMS and/or University performance to management (at University, Campus or FDD level as appropriate).

Communication of Requirements

Key legal and other requirements will be communicated to responsible people via email communication or training updates where relevant.

Availability of EMS Documentation

Key EMS documentation such as relevant procedures, work instructions and Reference Documentation will be made available to internal and external stakeholders. Once these documents have been approved for external publication they shall be placed on the resources pages of the Sustainability Team Website www.brookes.ac.uk/sustainability/environmental-management/ as well as the EMS folder in the Google drive (which is shared with the appropriate persons). Controlled documents will be publically available in a read only format in compliance with [System Documentation](#).

Communications to relevant interested parties.

Where possible the annual sustainability report will be used to fulfil the requirements of relevant interested parties information needs. Where specific reports are required on data sets they will be supplied in the required format to the relevant interested parties.

Communication in the case of emergency situations

Communications on the management of an emergency or accident will be directed by the requirements of the Major Incident Plan (MIP). The Environmental Sustainability Team will provide advice if it is requested by the staff members managing the emergency.

16 Documentation and Document Control

This procedure describes the activities involved in the preparation, revision and control of documents related to the University Environmental Management System (EMS), to ensure that they are up to date and readily accessible to the people who need to refer to them.

Responsibility

Persons responsible for the various actions required by this procedure are identified in Section 6 below. FDD managers on the core distribution list are responsible for ensuring that their employees are aware of any new or amended documents that may affect them.

The IT Department is responsible for ensuring that appropriate regular archive and backup of electronic documents is carried out in accordance with their control procedures. All staff are responsible for the proper completion and storage of records under their origination, in accordance with this procedure and the relevant EMS procedure to which the record relates.

Procedure

The EMS and its Documentation

The Head of Environmental Sustainability has overall responsibility for the development and control of the EMS. The System and its development strategy will be subject to periodic review in accordance with procedure [21 – Management Review](#). At present the system consists of the following documents:

- The Environmental Policy, Strategies and Action Plans
- The Environment Manual
- EMS Operational Control Procedures & Work Instructions

Unless listed in the EMS Document Index, related operational control procedures at FDD level are part of local work instructions or other organisational management systems/processes and will fall within their document control procedures.

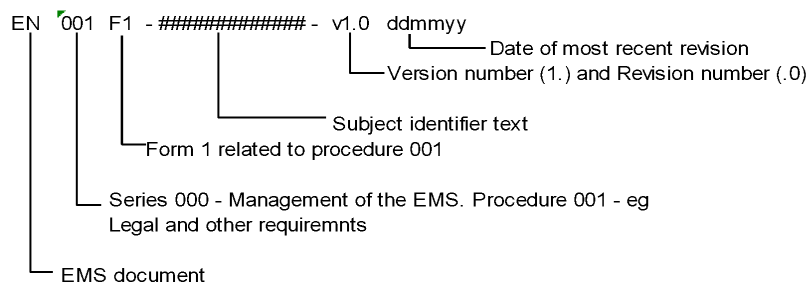
Control and issue of MSD

All MSD are stored in the EMS Folder on the Google drive. System procurements, work instructions, documents and forms are stored in the EMS Folder. Hardcopies of documents are uncontrolled. Once approved for use, operational procedures, work instructions and documents will be available in pdf format on the resource section of the [sustainability website](#).

The Head of Environmental Sustainability (or delegate) is responsible for ensuring that the Document Index is maintained up-to-date and that the up-to-date pdf copies of relevant documents are published on the resource section of the [sustainability website](#).

Each procedure and its associated documentation will be labelled with, and filed under, a unique file reference number and file name. Each file name consists of a 7-8 character Reference Number, text identifier, version numbering and date, in the following combination:

- Two characters – EN – indicating an EMS document
- Three numbers – XXX – indicating the document series; the same number is used for all documentation related to an individual procedure
- Two or three specific figures – SP or OP indicate system or operational control procedures; W1, W2 etc indicate Work Instructions; F1, F2 etc indicate associated Forms/Templates; and D1, D2 etc for associated reference documents.



- Certain documents may be year related and copies will be filed with the year number in brackets after the file name as outlined in section 6.
- Every page of each document will be labelled with the document number and title, and electronic filing reference as outlined in 6.1.6. The current format is used in the header of this document.
- The Owner of an MSD will be the most logical person to be responsible for a control procedure.

Storage and maintenance of records

All records will be stored in a systematic manner, indexed where possible, so that they can be readily identified and retrieved when needed. [11 – System Documentation](#) identifies the method of reference numbering for electronic filing of EMS system documents.

Electronic records will be regularly backed-up. Where IT system changes may affect the accessibility of stored/ archived electronic records, the planning for any IT changes will take account of relevant activities/ equipment required to ensure that archives can be easily recovered.

Retention and disposal of records

All records will be clearly dated to enable the retrieval of the most update records, and disposal of obsolete records.

Records will be kept for the specific period indicated at the end of each operational procedure or work instruction. Where a time period AND a lifetime is given, the retention period is the longer time.

At the end of the retention period, EMS related records will only be disposed of after consultation with the Head of Environmental Sustainability who will determine whether it is necessary to extend the retention period. The new retention period will be marked on the record concerned, along with the reason for the extension.

Preparation, amendment, review and abandonment of MSD

All suggestions for systems modifications, updates and MSD to be abandoned as obsolete will be directed to the Head of Environmental Sustainability (or delegate), who will assign document numbers and co-ordinate the document preparation, review and withdrawal process.

All MSD will be reviewed at least once every two years. The Head of Environmental Sustainability (or delegate) will technically review documents before final approval. Once

updated the revised MSD is stored in the Approved Storage Location. The Head of Environmental Sustainability (or delegate) will determine whether an obsolete copy of MSD will be archive for future reference.

17 System Control

Interfaces with other University Management Systems

Checks of the update status of linked documents will be carried out bi-annually by the Head of Environmental Sustainability (or Delegate).

The System Environmental Manual

The Manual is a controlled document containing the policy and overview of the management and control of the University's environmental performance and the system procedures. The Head of Environmental Sustainability (or Delegate) is responsible for ensuring that the Manual is reviewed at least once per year.

The EMS System and Operational Control Procedures

Each series of documents will consist of some or all of the following –

- **Procedure** – a written statement describing the standards, actions, responsibilities and documentation associated with a particular management activity, which may be supported by some of the following types of documentation;
- **Work Instructions** – a more detailed instruction as to how to undertake a specific task identified within a procedure;
- **Form** – a form which must be used by employees to record compulsory actions;
- **Document** – documents resulting from EMS management which are used as ongoing reference for planning, implementation, development and monitoring of the system.

Control of environmental records

Environmental records are properly maintained to serve as objective evidence of the implementation of, and conformance with, the ISO14001 Environmental Management System requirements.

Obligatory records are identified at the end of each EMS Operational Control Procedure contained within the EMSD, and are controlled in accordance with Procedure [11 – System Documentation](#).

18 Monitoring and Measurement of performance

Purpose

This procedure describes the actions and responsibilities associated with monitoring, measurement and reporting of key parameters associated with activities and operations of the University Environmental Management Systems, in order that its performance in relation to significant aspects can be adequately tracked and reported to key stakeholders and regulatory compliance assured.

Scope

This procedure covers the monitoring and measurement of the following key criteria:

Criteria	Measurement Parameter
Estate Management Records (EMR)	Energy and Carbon: <ul style="list-style-type: none"> • Energy consumption (by fuel type, res, non-res) • CO2 emissions (by fuel type, res, non-res) • Scope 3 CO2 emissions from water and waste • Scope 3 CO2 emissions from staff/student commuting and air travel, and business travel • Energy generated on site (CHP and PV) Water: <ul style="list-style-type: none"> • Water consumption (res, non-res) • Rainwater harvesting • Effluent Waste generated: <ul style="list-style-type: none"> • Residual, Recycling, Food waste, Hazardous, WEEE & clinical waste. Transport: <ul style="list-style-type: none"> • car parking spaces • cycle spaces • travel plan FTE Staff Nos: <ul style="list-style-type: none"> • Environment
Other statistics	EMS Accreditation Fairtrade accreditation
Achievement of O&T and MPs	Results of progress monitoring
Operational Control (including legal compliance)	Results of internal and external audits Data in relation to waste, water etc (anything not included above under the stats) Monitoring of complaints etc Monitoring of non-compliance procedure processes
Emergencies and incidents	No of incidents/accidents No of "near misses"

Responsibility

The Head of Finance collates the environmental management statistics and HESA Estates Management Statistics Report. The Sustainable Transport Strategy Lead is responsible for collecting and analysis of transport data. The Decarbonisation Strategy Lead is responsible for collection and reporting of energy and carbon related data.

The Head of Environmental Sustainability is responsible for the overall monitoring programme and for collecting and collating data, as outlined in the procedure below, from the responsible persons, before evaluating and reporting it to the nominated dissemination routes as outlined in Section 6.

Procedure

Defining the required monitoring and reporting

The Head of Environmental Sustainability or delegate will periodically review the monitoring and measurement programme to determine whether additional monitoring is required. Where additional monitoring is identified the Head of Environmental Sustainability (or delegate) will co-ordinate the necessary action and will update this procedure to reflect any changes.

The current programme, its status and success, and any major planned changes will be reported within the formal Management Review for approval.

Estates Management Statistics

Estates Management Statistics are required annually by HESA (in full). The approach to monitoring and reporting is defined on the HESA website (currently) –

http://www.hesa.ac.uk/index.php?option=com_collns&task=show_colln&Itemid=232&c=C10042&s=10&wvy=any&wvs=1&isme=1

The methodology for how Environmental Management System and HESA Estates Management Statistics Report data is collected, the timing of collection, the process of verification, how it is passed to the Finance & Business Manager, and, subsequently verified are outlined in the [EN010W1](#) Preparation of EMS and HESA Statistical Reports

Primary data for Environmental Management Statistics –

A) Energy and Carbon

The energy and carbon primary data is collected by the Energy and Carbon Reduction Manager from direct reading of metres on site and contacting suppliers. The results are passed to the Finance Director.

B) Waste Management

The following waste primary data is received by the Head of Environmental Sustainability or delegate from the relevant waste contractor:

- Landfill
- Recycling

- Incineration
- Anaerobic Digestion

C) **Water**

The following water primary data is collected by the Head of Environmental Sustainability or delegate from contacting suppliers. The results are passed to the Finance Director.

D) **Transportation**

General transportation use associated with the University is monitored via the biannual survey which is managed by the Transport Team. This aims to identify and assess the different methods used on University business and to commute to the University.

Other Performance Statistics

Achievement of O&T and MPs

Progress and achievement is monitored via the procedure [9 – Objectives and target system procedure](#)

Achievement of Compliance and Operational Control

Compliance and operational control is monitored via the compliance evaluation, internal and external audit processes, in accordance with procedures [20 – Internal EMS Audits](#), [23 – Emergency Preparedness and Response](#) and [19 – Incident Investigation, non-conformance, corrective and preventive action](#).

Where complaints are made that relate to operational control, these are also taken into account by the Head of Environmental Sustainability (or delegate).

Emergencies and Incidents

Emergencies and incidents are monitored via incident reports issued in accordance with procedure [23 – Emergency preparedness & response](#). The incidents are reported via the form [OBUHSN-11app2](#).

Accounting and analysis of environmental performance data

All environmental management and performance data is reviewed and approved by the Head of Environmental Sustainability (or delegate) before use in decision making, development of Objectives and Targets and/or information reporting etc.

Data Validation

A new 'Utilities Data Validation Procedure' [EN0014SP](#) has been completed in draft, this requires finalising with the completion of the new water supplier onboarding. The procedure describes the actions and responsibilities associated with data validation procedures for Gas, Electricity, Oil, Water and Waste.

Reporting of environmental performance

Data on the Institutional environmental performance is reported by the Head of Environmental Sustainability (or delegate) to:

- ECS' Senior Leadership Team (SLT).
- The Vice Chancellor's Group (Annual EMS report).
- Estate Management Statistics Report to HESA.
- Stakeholders via the annual Sustainability Report.

Reporting of Abnormal incidents

Abnormal incidents in relation to operational control, O&Ts, MPs and operational performance will be monitored and reported.

The Head of Environmental Sustainability (or delegate) will evaluate reports arising from 6.3.2 and 6.3.4 and will determine the need to report incident(s) to the proper authorities. The Head of Environmental Sustainability (or delegate) will also invoke procedure [19 – Incident Investigation, non-conformance, corrective action \(CA\) and preventive action](#) (PA) where appropriate.

Where normal or routine monitoring data identifies that legal limits are (or are about to be) exceeded, the Head of Environmental Sustainability (or delegate) may invoke procedure [19 – Incident Investigation, non-conformance, corrective and preventive action](#) where appropriate.

Non-conformances and corrective actions

Where monitoring indicates that performance is outside legal limits, that a problem is occurring or that performance targets are not being met, the Head of Environmental Sustainability (or delegate) will liaise with the Management Representative and Senior Management and will initiate Non-conformance action in accordance with procedure [19 – Incident Investigation, non-conformance, corrective and preventive action](#).

19 Incident Investigation, non-conformance, corrective and preventive action

The procedure applies to all non-conformances (actual or potential) with the requirements of the Environmental Management System (EMS). This includes:

- Legal requirements;
- Compliance obligations to interested parties.
- Environmental policy and objectives;
- EMS system procedures;
- Campus wide and Faculty/Department level operating procedures; and

- Local procedures identified in EN006D1 – that are linked to the application of the EMS (if they are not already subject to the NC, CA&PA requirements of another management system).

Responsibility

All staff are responsible for the identification and reporting of non-conformances whether actual or reasonably foreseeable. NCs will be reported to the appropriate Responsible People who will initiate this non-conformance procedure in the event of an actual non-conformance.

The Responsible People performing the activity which results in non-conformance is responsible for:

- reporting non-conformances to the Head of Environmental Sustainability (or delegate) and ensuring their investigation;
- ensuring appropriate CA&PA is undertaken.

The Head of Environmental Sustainability (or delegate) is responsible for:

- coordinating the investigation and reporting of non-conformances, including the identification of the cause of the non-conformity.
- monitoring the implementation of CA & PA's;
- adapting the environmental management system to include the preventative actions if necessary.

Procedure

Types of non-conformance identification

There are three main types of non-conformance identification:

- Routine surveillance & feedback
- Analysis of environmental performance
- Internal Audit

The requirements of the internal audits are outlined in Procedure [20 – Internal EMS Audits](#).

Reporting of non-conformances

Non-conformances identified as a result of an internal audit, external audit or incident reporting, and subsequent actions taken will be recorded on the LUS Register. Each action recorded on the LUS Register will use the following headings: 'non-conformance' or recommendation; 'cause'; 'corrective action' and 'preventative action'.

Non-conformances identified during audits will be reported to the Auditee and their Manager/Director/relevant responsible person, who will initiate action in accordance with this procedure.

Potential non-conformances or recommendations reported to line management will be evaluated by the relevant Responsible People who will, in consultation with the Environmental Compliance Officer, determine whether preventive action is required.

Where the Head of Environmental Sustainability (or delegate) considers that a critical non-conformance has been identified, she will notify the relevant Responsible People.

Investigation of non-conformances

The relevant Responsible People will take immediate action to ensure:

- any activity or incident that may cause an environmental impact as a result of the non-conformance is STOPPED, where practicable;
- compliance is restored; and
- environmental damage is mitigated.

The Responsible People will delegate agreed CA&PA to the appropriate person, along with a target date for completion. CA&PA will be appropriate to the magnitude of the problem(s) incurred and the consequent environmental impact(s). It will be designed to:

- correct the root cause of the non-conformance;
- prevent recurrence

The Responsible People will confirm the agreed CA&PA by email or phone to the Environmental Compliance Officer. In the event that the Head of Environmental Sustainability considers the actions taken to be inadequate s/he has the authority to require further CA&PA and to ensure it is carried out to his/her satisfaction

Implementing corrective and preventive action

The Responsible People will notify completion of CA&PA to the Head of Environmental Sustainability (or delegate), who will confirm completion of the CA&PA, if necessary by conducting a follow up inspection. Upon confirmation the Head of Environmental Sustainability (or delegate) will note the action taken in LUS Register for that year, using the agreed format. Actions not completed in accordance with the agreed schedule, requiring the additional grace period, or continued non-conformance will be reported to the appropriate Responsible Person for that FDD.

Preventive action identified that needs to be incorporated within an environmental management programme will be notified to the Head of Environmental Sustainability who will evaluate the need and proceed in accordance with procedure [Objectives and target systems procedure](#). Action requiring changes to system or operating procedures will be notified to the Head of Environmental Sustainability and custodian of the relevant procedure who will initiate

a review and amendment of the relevant procedure in accordance with procedure [System Documentation](#).

Monitoring of NCs and implementation of CA&PA

The Environmental Compliance Officer will log reported NCs, their resulting actions and deadlines on the LUS register. The Environmental Compliance Officer will monitor the progress of implementing CA&PA by liaison with the appropriate Responsible People. If completion of the CA&PA has not been notified to the Environmental Compliance Officer within 5 days of the agreed deadline the Head of Environmental Sustainability will remind the Head of FDD and will note this action in the non-conformance Register

Closing out and following up the NC&CPA

Upon confirmation of the completion of CA&PA, the Environmental Compliance Officer will close out the NC&CPA report by entering the completion date on the non-conformance Register. The Environmental Compliance Officer will follow up closed out NC&CPA and evidence within the LUS Register where appropriate, all NC&CPA's will be formally reviewed within 12 months of close out to ensure that CA&PA have been effective.

20 Internal EMS Audits

The Head of Environmental Sustainability will establish a three year plan to objectively evaluate the adequacy of, and conformance of the system with the requirements of the System Control Procedures as well as with the requirements of ISO14001. Audits are conducted by trained Environmental Auditors who are independent of the FDD(s) and Activities being examined.

Audit findings are evaluated and, where necessary, followed up by the designated action owners. Where action requires changes to environmental management or control, such changes are implemented by amendment to the relevant System & Operational Control Procedures and Work Instructions, in accordance with Procedure [22 – Operational Control of critical aspects](#). The relevant document custodian is responsible for amendments under the co-ordination of the Head of Environmental Sustainability (or delegate).

Internal Environmental Audits are organised and conducted in accordance with Procedure [22- Internal EMS Audits](#).

Responsibility

The Head of Environmental Sustainability (or delegate) is responsible for –

- preparing and implementing the programme of EMS audits and defining the scope of audits;
- assigning auditors, appropriate to the aspect, procedure or site under audit;
- reviewing and accepting audit reports made by the auditor; and verifications of implementation of agreed actions made by FDD management;
- where appropriate, coordinating improvements to the EMS that result from audit reports;

- assisting with the resolution of disagreements or delays during audits;
- reporting the results of audits to SLT and VCG;

The Lead Auditor is responsible for –

- organising, preparing, conducting and reporting audit;
- coordinating the activities of the audit team, where relevant;
- identifying and requesting any additional documents and information that may be required;
- identifying any relevant legislation or regulation that should be checked (if required as part of the audit);
- reviewing previous audit reports and ensuring familiarisation with the audit criteria;
- reviewing, agreeing and documenting issues for action.

The Key Auditee is responsible for –

- making available all relevant documents, records and personnel;
- providing objective evidence of conformance to the relevant procedures;
- ensuring that agreed corrective actions are implemented within the agreed deadline.

The Responsible People within FDD are responsible for –

- facilitating audits being undertaken within their functional unit;
- checking and closing out agreed actions once they have been completed.

Procedure

The Audit Cycle

The system and operational control procedures connected with the EMS will be audited at least once every three years. Relevant local operational control procedures will be audited by selection of an aspect and inspection of its control by each relevant FDD. These audits will cover a random selection of the local control procedures/instructions for that aspect. The local control of significant aspects will be audited for each relevant FDD at least once every three years.

The Head of Environmental Sustainability (or delegate) will use their judgement to determine whether an EMS element, procedure or critical aspect will be audited more frequently. This will be based upon the nature and importance of the aspect or activity to be audited, as well as its nature, scale and complexity. Where the Head of Environmental Sustainability (or delegate) considers that a problem may be occurring, s/he may programme additional audits of any procedure, aspect or activity.

Responsible People and their line management may request additional audits of their unit's activities whenever they consider that an audit would be of benefit. Requests for audits should be sent to the Environmental Compliance Officer. Taking account of audit reports, any amendments to the EMS and relevant plans for the University/Campus, the Head of Environmental Sustainability (or delegate) will review and, where necessary, update the audit cycle on an annual basis.

To complement the internal audit programmes, the Head of Environmental Sustainability (or delegate) may commission an external third party audit of all or any of the EMS procedures, documents, or significant aspects. The Head of Environmental Sustainability (or delegate), in consultation with the Management Representative will determine the scope of such an external audit and where appropriate this may replace a scheduled internal audit.

Audit programmes

In establishing the audit programme the Head of Environmental Sustainability (or delegate) will ensure the following:

- only approved auditors will be designated to conduct audits;
- cross functional auditing will be carried out to ensure audit independence; auditors are capable of being objective and impartial.

The audit programme will be documented in EN011D1.

Internal auditor training

All internal auditors will be competent to conduct management system audits and will be selected by the Head of Environmental Sustainability (or delegate). Approved auditors may be employees, students and/or third parties.

Internal auditors will be assessed to determine that they have the necessary knowledge, experience and competence need to conduct a EMS audit. Training courses will be provided to those individuals that require it as part of their continual professional development

Only staff and other environmental professionals that have attended a full EMS Internal Auditors course, or have satisfactory experience and training of auditing, will be approved as Internal Auditors

Audit planning, Conducting and Follow up

Planning, conducting, follow up and reporting of the audit will be carried out in accordance with work instruction EN011W1.

Completion, review and registration of audits

Upon receipt of the first draft audit report, the Head of Environmental Sustainability (or delegate) will review the issues and agreed actions and will resolve any unsatisfactory aspects with the auditor. If the Head of Environmental Sustainability (or delegate) considers that further action is required s/he will meet with the relevant personal³ to discuss the audit results

³ This may include lead auditor, key auditee and/or relevant line managers

and actions. Once the Head of Environmental Sustainability (or delegate) is satisfied with the report s/he will send the original copy to the relevant Responsible People to chase up and close out the agreed actions by signing off the report.

Once the audit is completed, the audit will be filed by the Head of Environmental Sustainability (or delegate). The Environmental Compliance Officer will chase, from the relevant Responsible People audit reports that are still outstanding prior to end of the financial year.

Reporting audit results

The Head of Environmental Sustainability (or delegate) will report the results of audits to designated management representatives on a periodic basis, any major problems occurring will be reported to the Management Representative immediately in order that appropriate action can be taken.

As part of the ongoing review of the effectiveness of the EMS, the Head of Environmental Sustainability (or delegate) and the Management Representative will analyse the non-conformances identified during internal audits and produce a report for discussion with the Responsible People in charge of the FFD in question. This will include identification of areas of the University's activities requiring preventative actions to be taken in order to avoid recurrence of problems.

21 Management Review

Procedure

The Senior Leadership Team (SLT) followed by the Vice Chancellor's Group (VCG) will formally review the University's environmental and EMS performance on a periodic basis, at least once per year and normally after completion of internal and external audits. This meeting will also review the environmental policy and consider any new objectives proposed by the Head of Environmental Sustainability.

Information and actions to be considered

The environmental performance of the Campus will be reported on a periodic basis in accordance with [Monitoring and Measurement of Performance](#). An overall annual performance report will be provided to the Management Review meeting.

In addition, information will be reported on:

- progress in implementing actions determined in previous management reviews;
- progress with achievement of objectives and targets;
- progress with implementation of environmental programmes;
- review of significant environmental aspects;
- summary of changing circumstances (including legal obligations) that affect the Campus
- proposed amendments to objectives and targets

- summary results of internal audits undertaken (both systems and compliance);
- the results of surveillance audits by the external system auditors
- analysis of non-conformances identified and status of corrective and preventive actions, as well as any improvement opportunities identified;
- relevant communications from stakeholders

SLT / VCG will consider the performance of the EMS in the light of the results being reported, any changes that may have occurred on Campus, or at the University, and feedback from internal or external sources. In the event that the EMS is deemed to be operating ineffectively appropriate action will be determined and implemented. In particular, priority for action will be given to areas of non-conformance with the Campus procedures for operational control.

Review of policy and objectives

A detailed review and revision of the environmental policy and objectives will be undertaken where the following are considered to have occurred:

- new significant environmental aspects and impacts arise that substantially affect the direction provided by the policy;
- changes in the organisation (activities, services and structure), any applicable government or other policies, and any applicable technology, that may influence the direction of the Campus and therefore the policy, objectives and targets; and
- new or changed legislation and other requirements of interested parties

Revisions of the environmental policy will be consulted on by SLT and approved by the VCG. The policy will be signed by the Vice Chancellor. The review of the Environmental Policy must be completed on at least an Annual Basis.

Revision of objectives and targets will be undertaken in accordance with [9 - Objectives and targets system procedure](#).

Output of the Management Review

The management review meeting will be documented. In particular, areas of concern and actions identified will be noted. Required actions will be assigned to appropriate personnel and their implementation monitored by the Head of Environmental Sustainability (or delegate).

Observations, conclusions and recommendations arising from the ongoing management review will be communicated to all relevant employees for action.

Head of Environmental Sustainability's System Review

Periodic review

The Head of Environmental Sustainability (or delegate) will maintain an ongoing process of EMS review to ensure that the system is up to date and functioning. The Environmental Compliance Officer will periodically undertake an analysis of the identified non-conformances to

spot trends and clusters which require attention or which may indicate “near miss” type occurrences that should be addressed.

Integration of feedback

Feedback from internal audits, third party surveillance audits and non-conformance reports & analysis will be integrated into system elements.

22 Operational Control of critical aspects

Responsibility

The Head of Environmental Sustainability (or delegate) and Responsible People are responsible for ensuring that the requirements of this procedure are met.

Procedure

Scope of Operational Controls

The significant aspects/threats will be defined in accordance with the [Environmental Aspects System Procedure](#). These will be reviewed at least annually by the Head of Environmental Sustainability (or delegate).

In preparing controls for the University significant aspects/threats, the following will be considered -

- Process/ project planning, design and construction
- Maintenance and engineering (including Faculty delivery of relevant academic programmes)
- Materials storage, handling, use and transport
- Energy and resources consumption
- Waste production, management and disposal
- Purchase of goods and services from external suppliers and contractors

New projects, process changes and planned maintenance will be evaluated in accordance with the Environmental Policy, the Sustainable Design Criteria for New and Refurbished Buildings and the Sustainable & Ethical Procurement Policy. Where consulted the Environmental Sustainability team will give guidance on appropriate sustainability criteria required.

Procurement of hazardous materials will be evaluated in accordance with guidance from the Health & Safety Officer or delegate. COSHH training will be provided by the H&S Officer to staff members that have been identified as requiring it by their line manages. COSHH registers will be held by the FDD that are using the chemicals and audited periodically by the H&S Officer or delegate.

Source identification

In line with the Head of Environmental Sustainability's review of the University significant aspects and impacts, the FDDs or Responsible People will identify the source(s), in their area of responsibility, of aspects/threats that are ranked Medium, High or Top priority. Where a previous identification exercise has been conducted the FDDs will review this and identify any additional sources that might have arisen as a result of changes in the activities of the relevant FDD; or the identification of a new significant aspect by the Head of Environmental Sustainability's implementation of [Environmental Aspects System Procedure](#).

Source information will take account of 6.1.2 and will consider activities under normal, abnormal and reasonably foreseeable emergency situations

Operational Control

For each source identified under 6.2, the Head of Environmental Sustainability or delegate, will review with the FDD to determine –

- Whether there is an existing written operational control procedure.
- Whether the existing procedure is adequate for the required level of control.
- If there is no written operational control procedure, whether it is practicable to control the source and aspect through this means.

Where control is practicable through written procedures etc., a custodian will be nominated by the Authorised Person and they will, with advice from the Head of Environmental Sustainability or delegate, co-ordinate the preparation of a written control procedure in accordance with the requirements; and taking account of the requirements outlined below –

Written operational control procedures will describe how the identified sources and critical tasks will be controlled. This will include the followi–g -

- Acceptance/operating criteria and/or parameters
- The method of monitoring the acceptance criteria (as appropriate); and
- Instruction regarding action and reporting in abnormal or emergency situations (where this is not already covered under the University procedures related to incidents or emergency response)

Where appropriate to the task under control, operational control procedures will be at a University/Campus wide level. Where more focused and detailed operating parameters need to be defined for local control, FDDs may implement local operational control procedures in line with Campus wide procedures; such local procedures will be referenced from the EMS Document Index but may be incorporated within the FDD Management System if in existence.

Where it is considered not practicable to control the source of an aspect/threat ranked Medium, High or Top priority, the reason for this will be documented.

Review of Operational Control

The custodian of the operational control procedures will review the document in line with the advice of the University Records Manager.

23 Emergency Preparedness and Response

Responsibility

The Head of Environmental Sustainability (or delegate) is responsible for ensuring that this procedure is implemented.

Heads of FDDs are responsible for conducting risk assessments within their areas of operational and/or academic responsibility and will ensure that appropriate local emergency response procedures are implemented where there is not an applicable University/Campus wide response procedure. Where this is the case the Head of Environmental Sustainability can be consulted.

Procedure

Scenario generation and response planning

Emergency response training will be delivered to ensure appropriate environmental management responses to accidents and emergency situations; including, where practicable, prevention and/or mitigation of identified environmental impacts including (this list is not exhaustive) –

- Control of accidental or fugitive releases to land, air and water
- Minimising quantities of noxious or polluting materials leaving the University
- Minimising damage to environmental control/ abatement equipment
- Where practicable, rapid cessation of the environmental impact occurrence
- Clean up, decontamination and appropriate disposal of waste materials
- Environmental risk assessments for specific risk are available

Where appropriate, response training will be integrated with the MIP; where this is not applicable, separate training will be prepared.

Major Incident Plan

It is the responsibility of the MIRG to review and update the MIP. The Head of Environmental Sustainability can act as a consultee to the process and submit, where appropriate, information related to potential environmental impacts associated with Major Incidents to the MIRG for consideration during updates of the MIP.

The Head of Environmental Sustainability (or delegate) is responsible for ensuring that an up to date local copy of the MIP is maintained within ECS. The Head of Environmental Sustainability (or delegate) is responsible for ensuring that testing of the MIP takes account of any environmental protection and response requirements that might be applicable; and where the MIP test is not adequate for EMS purposes will ensure that appropriate testing is done in line with the Training and testing of ERPs section below.

Reporting Incidents, Accidents and Emergencies that have environmental consequences

Where the incident etc. occurring causes a major environmental impact or results in a breach of legal requirements applicable to the University, the form [OBUHSN-11app2](#) (this incident report is currently under review - Mar 2022) will be completed and returned to the H&S team and the Head of Environmental Sustainability or delegate for evaluation and follow-up.

Training and testing of Business Continuity Plans

Training will be available to relevant employees in actions for relevant environmental emergency plans and procedures. Each FDD is responsible for producing its own Business Continuity Plan assessing risks in response to any major incidents. Where practicable, and applicable, exercises in relation to the environmental element of emergency, contingency and disaster recovery plans will be undertaken in accordance with the MIP programme.

Where not practicable or applicable, the Head of Environmental Sustainability will liaise with Heads of FDD to ensure that EMS related emergency response plans and procedures are periodically tested across all relevant FDDs.

Review of Emergency Response Procedures and Plans

The MIP will be reviewed in line with the MIRG annual programme. Other EMS related emergency response plans and procedures will be reviewed and updated under the following circumstances –

- Every three years;
- When there is a significant change in an activity or process that might generate additional emergency scenarios;
- When a significant accident or emergency incident has occurred (that does not fall under the MIP) and that was not envisaged within the previous emergency planning process, or to incorporate lessons learnt as a result of the incident; or
- Where appropriate, to incorporate the results of testing exercise.

[Spill Response](#) procedures will be put in place and training to all relevant personnel will take place at least every 2 years.

24 Annex 1 –Campus Layout Plans

Headington Campus

Gispy Lane:

<https://radar.brookes.ac.uk/radar/file/cddcd699-ceda-6ec1-16b1-aeac02307e0f/1/GipsyLane-usm.pdf>

Headington Hill:

<https://radar.brookes.ac.uk/radar/file/cddcd699-ceda-6ec1-16b1-aeac02307e0f/1/headhill-usm.pdf>

Marston Road:

<https://radar.brookes.ac.uk/radar/file/cddcd699-ceda-6ec1-16b1-aeac02307e0f/1/marstonroad-usm.pdf>

Wheatley Campus

<https://radar.brookes.ac.uk/radar/file/cddcd699-ceda-6ec1-16b1-aeac02307e0f/1/Wheatley-usm.pdf>

Harcourt Hill

<https://radar.brookes.ac.uk/radar/file/cddcd699-ceda-6ec1-16b1-aeac02307e0f/1/Wheatley-usm.pdf>

25 Annex–2 - University Organisational Diagram

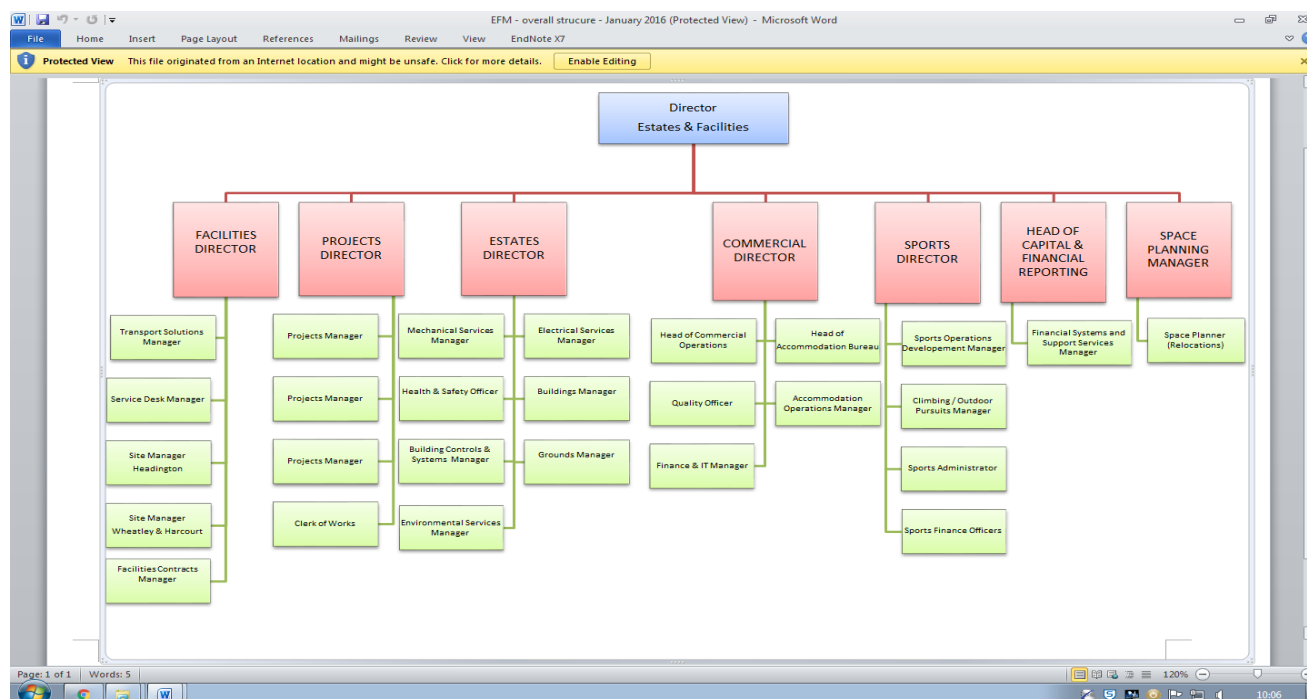
Board of Governors
Membership of the board of governors can be found at: https://www.brookes.ac.uk/about-brookes/structure-and-governance/board-of-governors/
Senior Management Team (Vice Chancellor’s Group) Membership of the VCG can be found at: https://www.brookes.ac.uk/about-brookes/structure-and-governance/vice-chancellors-group/
Directorate List <i>Academic and Student Affairs</i> <i>Marketing & Communications</i> <i>Estates and Campus Services</i> <i>Finance and Legal Services (including Procurement)</i> <i>People Directorate (including Health & Safety; training etc)</i> <i>Learning Resources</i> <i>IT Systems Management & Support</i> <i>Research Services and Business Development</i>

26 Annex 3 – Faculty Structure

The faculty and department structure can be found at:

<http://www.brookes.ac.uk/about-brookes/faculties-and-departments/>. [OxB EN002D1 Aspects Register](#) contains a full list of buildings and which Faculties (Schools), Directorates or Departments operate out of them.

27 Annex 4 – Organisation Structure of Directorate of Estates and Campus Services



28 Annex 5 – EMSD Index and filing structure

The current EMSD index is listed in document – [EN006D1](#).

29 Annex 6 Relevant Interested Parties

Interested Parties	Needs	Reporting requirements	Compliance Obligations
Students/ including prospective students and alumni	80% of students nationally want their institution to become more sustainable.	Annual EMS Report, Sustainability Report, Communications plan - website regular updates, social media; environmental events & campaigns; involvement with the SU environmental forum; support for sustainability related projects / dissertations; individual response to questions; lectures.	Embed EMS / sustainability objectives with University Strategy (2035). Deliver aspirations of the 'Sustainability Steering Group' Engage, communicate and report.
Students Union	Pressure to meet the needs of the students. Collaborative approach to ensure the students needs and requests are delivered to enhance the student experience.	Annual EMS Report, Sustainability Report, Communications plan - website regular updates, social media; environmental events & campaigns; involvement with the SU environmental forum; support for sustainability related projects / dissertations; individual response to questions; lectures.	Annual review Environmental Policy NUS Green Impact support & training. Organise & chair Environmental Forum meetings. Communications plan.
Staff	Many staff wish to work for a sustainable institution.	Annual EMS Report, Sustainability Report, Communications plan - website regular updates, social media; environmental events & campaigns; regular updates through a variety of media, such as the ENVforum, sustainability email, onstream and individual response to questions and internal training events.	Embed EMS / sustainability objectives with University Strategy (2035). Deliver aspirations of the 'Sustainability Steering Group' Engage, communicate and report. Green Impact delivery, support and training

VCG group	The VCG is the primary executive body of the University, with responsibility for developing and implementing University strategy.	Annual EMS Report and Sustainability Report. Sign-off of any new strategies or policy updates.	Annual EMS Report, Sustainability Report,
Board of Governors	The Board of Governors is responsible for determining the overall mission and setting the educational character of the University. It approved the University's eight key objectives, the academic plan, and core strategies. The Board is also responsible for monitoring the performance of the University.	Annual Sustainability Report and sustainability performance overview.	n/a
Local community	Local residents, residents associations and interested groups wish to understand the sustainability of the organisation. In particular they are interested in measures put into place to reduce impacts from transport to site, noise from students and waste management from students.	Annual Sustainability report, Community engagement reports shared with local residents at residents meetings. Active engagement through the Community Engagement Team	Residence meetings (3xpa). Annual community engagement report. Complaints database.

Sustainability Steering Group	To provide directional guidance on the University's sustainability aspirations to align with the new University Strategy (2035).	Annual EMS Report, Sustainability Report, Communications plan, external sustainability reporting frameworks, legislation and compliance.	<p>Provide directional guidance on the University's sustainability aspirations and their implementation University wide.</p> <p>Internal and external sustainability reporting frameworks</p> <p>Agree priority areas, potential resources required and ownership.</p> <p>Ensure our agreed sustainability aspirations are embedded across the University and captured in the new University Strategy.</p>
Energy Management Advisory Group	The purpose of the group is to provide good governance and risk supervision for the management, purchasing and reduction of energy and associated carbon emissions at the University.	Energy & carbon reduction strategy and action plan updates. Quarterly, utility spend and performance review of purchasing strategy with our brokers (if intervention is required an emergency meeting will be called). EMR statistics and reporting. Legislative and compliance reporting.	<p>Develop and review the performance of the University's utility contracts; Appraisal of legislative and political risks relating to energy and carbon emissions; Ensuring a strong strategic link between energy and carbon reduction initiatives and the University's estate investment plan; Scrutinising energy and carbon reduction initiatives at the University; Disseminating feedback on performance</p> <ul style="list-style-type: none"> Sharing ideas for new innovations and approaches (e.g. Financial assessment tools, procurement approaches, innovative funding mechanisms)
Travel Advisory Group	To inform and influence the development and implementation of fully integrated 'Sustainable Travel Strategy', contributing	Annual EMS Report, Travel Strategy, Communications plan, national/local transport policy legislation and policy	Identify and address the key issues that will enable the timely development of a long-term, forward thinking Travel Strategy & Action Plan.

	towards Oxford's Campus Vision		Agree targets to achieve national and regional net zero carbon obligations, transport connectivity and air quality emissions initiatives. Ensure targets are being delivered, monitored and embedded across the University.
Zero Carbon Oxford Partnership	Attendance of ZCOP Steering Group meetings and sprint group lead for transport	Attendance of the ZCOP Steering Group. Minutes of the meetings.	None specified
Workplace Parking Levy	Attendance of meetings	Active engagement, information sharing and informing the University's Travel Advisory Group in terms of emerging Sustainable Travel Strategy.	None specified
Local Transport Connectivity Plan	Attendance of meetings	Active engagement, information sharing and inform the University's Travel Advisory Group in terms of emerging transport policy	Work towards delivering a reduction in car use within Oxford in favour of sustainable travel, promote health communities and active travel, support resilient communities
Oxford City Park & Ride Working Group	Attendance of meetings	Contribute towards safeguarding Oxford P&Rs.	Not yet determined
Contractors / Consultants	Need to understand the Universities compliance obligations, policies, strategies, objectives/	Communicated through the procurement process, sustainable design checklists, contractor information pack and operational control procedures.	Communication of the Universities' compliance obligations, policies, strategies, objectives/ targets, procedures and contractual obligations.

	targets, procedures and contractual obligations.		
Suppliers	Need to understand the Universities compliance obligations, policies, strategies, objectives/ targets, procedures and contractual obligations.	Communicated through the procurement processes and operational control procedures.	Contract specific.
Environment Agency	Need to ensure legal compliance and a duty of care.	Various reports and documented Information requirements when requested.	Linked to all EA requirements in LUS compliance register.
Oxfordshire County Council and Oxford City Councils, Vale of White Horse and South Oxfordshire District Council	Town and Country Planning, Building regulation requirements; Local Plan and travel plan adherence.	Includes: - Environmental statements. - Planning applications - Transport surveys, assessments and Action plans.	Linked to all County/City and Local Authority, requirements in the LUS compliance register.
Higher Education Funding Council for England (HEFCE) and HESA.	Range of environmental monitoring data and statistics via HESA.	HESA EMS stats returns	Returning the Estates Mngt Statistics and Finance, student and staff records
DEFRA	Licences	Reports when required	Requirements in the LUS compliance register

Unison and UCU	General interest in the Universities performance	Annual Sustainability report	Sustainability Steering Group Committee attendance
NQA	Audit to ensure compliance with ISO14001 requirements.	All EMS documentation and annual reports.	Organise and manage annual audit
Fairtrade Foundation	University Fairtrade Status	Biannual Fairtrade Report	See Sustainable Food Action Plan
Sustainable Food Provision 1. Marine Stewardship Council 2. Sustainable restaurant awards	1. Maintain accreditation. 2. Maintain accreditation.	Ensure that the standards are still met.	See Sustainable Food Action Plan
Local and National Press	Interest in sustainability initiatives	On a case by case basis – refer to the Communications Plan	None specified
Conference Guests	Interest in sustainability initiatives	Reference to the Universities Sustainability Strategies, Action Plans and reports	None specified
EAUC	None it is our membership organisation	None identified	None specified

Landlords for campus ownership	To understand how we are managing the property and to meet the lease requirements.	Regular updates on management of the property and any changes	Adherence to the Lease requirements
Tenants	To understand how we are managing the property and to meet the lease requirements.	None identified	None specified
Partner Colleagues	Integration of some environmental initiatives	Reference to the Universities Sustainability Strategies, Action Plans and reports – delivered via internal staff comms.	None specified
Oxfordshire Social Enterprise Partner OBU's Social Entrepreneur Awards (OBSEA)	An informal partnership arrangement between OBU, University of Oxford and Student Hubs. We liaise with the Oxfordshire community of social entrepreneurs.	Active engagement and information sharing.	None specified
People and Planet University League	Achieve and report on the League's criteria.	Annual Sustainability report (and other publically available data) and HESA submissions.	None specified
Times Higher Education	Achieve and report on the ranking's criteria, based around the UN SDG's.	Currently not reporting.	None specified

Impact Rankings			
Good Food Oxford	Attendance of meetings	Active engagement and information sharing	None specified
Zero Carbon Oxford	Attendance of meetings	Members of the Steering Group, active engagement and information sharing	Alignment with Oxfords 2040 'net zero target, active partners in the ZCO Steering Group.
Oxford Green Week	Attendance of meetings	Active engagement and information sharing	None specified
Green & Blue Oxford Network	Attendance of meetings	Active engagement and information sharing.	None specified
Headington Action	Attendance of meetings	Active engagement and information sharing.	None specified
Oxfordshire Local nature partnership	To be determined	Initial consultation only at this stage	To be determined