

Environmental Management System

Evaluation of Compliance
EN012SP

1 Purpose

This procedure outlines the actions and responsibilities involved in formally checking that the University EMS is complying with the legal and other requirements that apply to its activities.

This procedure supplements EN011SP – Internal Audits, which covers audits of the Management System and the quality control of audits and auditor competence. The planning, co-ordination and quality control aspects of procedure EN011SP apply to this procedure also.

2 Scope

The Scope of the Environmental Management System certification includes the Wheatley, the Harcourt Hill and Headington Campus, as well as our Brookes owned Halls of Residence. 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.

This procedure applies to all the University activities, products and services in every FDD in the Scope of the EMS that is affected by items that are listed in the Legal Register (regardless of whether that activity is deemed significant under the aspects assessment)

3 References

- EN001D1 – On-line Legal Register.
- EN011SP – Internal Management Systems Audits.
- EN013SP – Non-conformity, corrective and preventive action.
- EN011D1 – EMS Audit Three Year Cycle.

4 Definitions

Employee	All persons who are employed full time, part time or temporarily on Campus, including both direct employees, and outside Contractors
FDD	Faculties/ Directorates/ Departments
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 Environmental Sustainability Manager.
Stakeholder	All persons with legitimate interest in the performance of the Campus, including but not exclusive to: employees, students and other customers, neighbours, regulators, grant-making bodies, non-governmental organisations and the media.

5 Responsibility

- 5.1** In addition to the responsibilities outlined in procedure EN011SP; the Environmental Sustainability Manager 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 the Senior Leadership Team;
 - Where necessary, timely reporting of any legal non-compliances to the appropriate Regulator;
 - Where necessary, ensuring that relevant procedures are updated inline with revised legal requirements or the findings of compliance evaluations.
- 5.2** The responsibilities of the Auditor, key auditee and faculty/Department line management are defined in procedure EN011SP.

6 Procedure

6.1 The Compliance Evaluation Cycle

- 6.1.1** All elements of legal requirements will be evaluated once per year for each relevant FDD.
- 6.1.2** 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.
- 6.1.3** Responsible people and line management may request evaluations of their areas of responsibility whenever they consider that an evaluation would be of benefit.
- 6.1.4** Taking account of evaluation reports, any amendments to legal and other requirements and the operational plans for the Campus, the Environmental Sustainability Manager will review and, where necessary, update the audit cycle on an annual basis and will use this to plan a more detailed evaluation programme for every relevant Faculty/Department.
- 6.1.5** The Environmental Sustainability Manager 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 Environmental Sustainability Manager, in consultation with the Management Representative, will determine the scope of such an external evaluation.
- 6.1.6** The compliance evaluation cycle is outlined in EN011D1 – EMS Audit Three Year Cycle which gives frequencies audits. Compliance evaluations are carried out at the same time as the health and safety compliance audits of FDD’s

6.2 Preparing compliance evaluations programmes, assigning auditors and scope

- 6.2.1** 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

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

- A technical advisor, where requested.

6.2.2 The evaluation programme will be notified to the relevant Responsible Person, 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.

6.2.3 The Environmental Sustainability Manager will notify auditors of their programmed evaluations and due dates and will monitor their completion.

6.2.4 The evaluation programme will be documented in EN011D1 – EMS Audit Three Year Cycle.

6.3 Guidance on requirements

6.3.1 The Environmental Sustainability Manager 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 procedure EN001SP.

6.4 Auditor Competence

6.4.1 The requirements of procedure EN011SP will apply

6.5 Planning, conduct and reporting of compliance audits

6.5.1 The requirement of procedure EN011SP will apply as relevant to legal compliance auditing (i.e. clauses not of relevance will be ignored).

6.5.2 Where compliance with legal or other 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.

6.5.3 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 Environmental Services Manager first in order to agree the approach.

6.6 Reporting legal non-compliances

6.6.1 Where the compliance evaluation finds non-compliances, these will be reported in accordance with procedure EN013SP - Non-compliance, corrective and preventive action.

7 Impacts and actions required in relation to Non-Conformance

7.1 Failure to apply this procedure may result in:

- a failure to conduct compliance evaluations may result in the Campus not spotting a (potential) non-compliance situation that could be rectified before the risk of regulatory action arises; also an inability to demonstrate compliance as required by certification to ISO14001. When formally certified to ISO14001(2015), this might affect the Campus’ ability to retain certification.
- failure to comply with this procedure may be identified in a number of different ways – both formal and informal - but will be addressed using procedure EN013SP - Nonconformity, corrective action & preventive action.

8 Records and Related Documents

Ref No.	Title	Storage custodian	Retention Period
	Audit checklists (completed) and audit work papers	Environmental Sustainability Manager	
EN011D1	EMS Audit Three Year Cycle	Environmental Sustainability Manager	

9 Custodian and Review Panel

The author of this procedure is: Environmental Sustainability Manager
 The owner of this procedures is: Environmental Sustainability Manager
 This procedure was reviewed by: Environmental Sustainability Assistant

10 Change history

Version 1.0	New procedure issued 21/06/12
Version 2.0	New procedure issued 03/06/13
Version 3.0	New procedure issued 16/04/14
Version 4.0	New procedure issued 30/06/18
Version 5.0	New procedure issued 01/09/19