

1 Purpose

This procedure outlines the mechanism for identification, reporting and investigation of non-conformance; taking action to mitigate any environmental impacts caused, and for initiating required corrective and preventive actions.

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.

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

- Legal requirements;
- Environmental policy and objectives;
- EMS system procedures;
- Campus wide and Faculty/Department level operating procedures; and
- Local procedures identified in EN006D1 - Register of linked operational procedures – that are linked to the application of the EMS.

3 References

- EN006SP – EMS Documentation
- EN010SP – Monitoring, measurement and Reporting
- EN012SP – Evaluation of Compliance
- EN011SP – EMS Internal Audits

4 Definitions

CA&PA	Corrective Action & Preventive Action
Corrective action	Action taken to address an existing non-conformance, and to eliminate its cause(s) in order to prevent its recurrence.
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
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 (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
NC&CPA	Non-conformance, Corrective or Preventive Action
Preventive action	Action taken to eliminate the causes of a potential non-conformance in order to prevent its occurrence.
Responsible People	Key managers and communicators within FDD and student accommodation responsible for disseminating information to 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** 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.
- 5.2** The Responsible People performing the activity which results in non-conformance is responsible for:
- reporting non-conformances to the Environmental Sustainability Manager (or delegate) and ensuring their investigation;
 - ensuring appropriate CA&PA is undertaken.
- 5.3** The Environmental Sustainability Assistant is responsible for:
- coordinating the investigation and reporting of non-conformances
 - monitoring the implementation of CA&PAs;
 - co-ordinating development of preventive actions that require incorporation into the environmental management programme.

6 Procedure

6.1 Types of non-conformance identification

6.1.1 There are three main types of non-conformance identification:

- a) Routine surveillance & feedback
- b) Analysis of environmental performance
- c) Internal Audit

6.1.2 The requirements of Type (c) are outlined in Procedure EN011SP - EMS Internal Audit.

6.2 Reporting of non-conformances

6.2.1 Non-conformances identified as a result of an internal audit, external audit or incident reporting will be recorded on EN013F2.

6.2.2 The progress of the actions taken will be recorded and reported on in EN013F2.

6.2.3 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.

6.2.4 The Environmental Sustainability Manager or delegate will assign a unique date /FDD & Responsible Person to reports of the Non-conformances & Observations.

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

6.2.6 Where the Environmental Sustainability Assistant considers that a critical non-conformance has been identified, he/she will notify the relevant Responsible People.

6.3 Investigation of non-conformances

6.3.1 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.

6.3.2 The Responsible People will delegate agreed CA&PA to the appropriate person, along with a target date for completion.

6.3.3 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

6.3.4 The Responsible People will confirm the agreed CA&PA by email or phone to the Environmental Sustainability Manager.

6.3.5 In the event that the Environmental Sustainability Manager 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

6.4 Implementing corrective and preventive action

6.4.1 The Responsible People will ensure that CA&PA is completed within three months of the notification of the non-conformance. Where it is not possible to meet this deadline the Head of FDD will agree a schedule with the Environmental Sustainability Assistant.

6.4.2 The Responsible People will notify completion of CA&PA to the Environmental Sustainability Manager who will confirm completion of the CA&PA, if necessary by

conducting a follow up inspection. Upon confirmation the Environmental Sustainability Assistant will note the action taken in EN013F2 for that year.

- 6.4.3** If the Environmental Sustainability Assistant is unable to confirm completion of the CA&PA within the agreed schedule, a further agreed grace period (agreed in advance) will be given for completion to be achieved, this will be noted in the EN013F2.
- 6.4.4** Action not completed in accordance with the agreed schedule, requiring the additional grace period, or continued non-conformance will be reported to appropriate Responsible Person for that FDD.
- 6.4.5** Preventive action identified that needs to be incorporated within an environmental management programme will be notified to the Environmental Sustainability Manager who will evaluate the need and proceed in accordance with procedure EN003SP – Objectives and targets.
- 6.4.6** Action requiring changes to system or operating procedures will be notified to the Environmental Sustainability Manager and custodian of the relevant procedure who will initiate a review and amendment of the relevant procedure in accordance with procedure EN006SP – EMS Documentation.

6.5 Monitoring of NCs and implementation of CA&PA

- 6.5.1** The Environmental Sustainability Assistant will log reported NCs, their resulting actions and deadlines on the form EN013F2.
- 6.5.2** The Environmental Sustainability Assistant 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 Sustainability Manager within 5 days of the agreed deadline the Environmental Sustainability Assistant will remind the responsible person and will note this action in the EN013F2.

6.6 Closing out and following up the NC&CPA

- 6.6.1** Upon confirmation of the completion of CA&PA, the Environmental Sustainability Assistant will close out the NC&CPA report by entering the completion date on the EN013F2.
- 6.6.2** The Environmental Sustainability Assistant or delegate will follow up close out NC&CPA with 2 months of close out to ensure that CA&PA have been effective.

7 Impacts and actions required in relation to Non-Conformance

7.1 Failure to apply this procedure may result in:

- a failure to properly monitor the function of the EMS and its application, spot potential issues before they arise; and/or investigate and properly correct issues that have occurred. 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 - non-conformity, corrective and preventive action.

8 Records and Related Documents

Ref No.	Title	Storage custodian	Retention Period
EN013F2	Internal, External, Non-conformance and Spills	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 21/06/2012
Version 2.0 New procedure issued 02/08/2013
Version 3.0 New procedure issued 18/04/2014
Version 4.0 New procedure issued 30/06/2018
Version 5.0 New procedure issued 01/09/2019