



## Environmental Management System - Internal Audit Report

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|---|-------------------------------------|
| <b>Scope of Audit:</b> Arts University Bournemouth      |                                     |
| <b>Audit Date:</b> 05/09/2019                           |                                     |
| <b>Auditors:</b> Alex Hobbins                           |                                     |
| <b>EcoCampus Requirements</b>                           | <b>Clause Audited</b>               |
| <i>Bronze Phase -Planning</i>                           |                                     |
| 1.1 Leadership & Commitment                             | <input checked="" type="checkbox"/> |
| 1.2 Context of the Institution                          | <input checked="" type="checkbox"/> |
| <i>Silver Phase - Implementing</i>                      |                                     |
| 2.1 Compliance Obligations                              | <input checked="" type="checkbox"/> |
| 2.2 Environmental Aspects                               | <input checked="" type="checkbox"/> |
| 2.3 Planning Action                                     | <input checked="" type="checkbox"/> |
| 2.4 Environmental Objectives                            |                                     |
| 2.5 Environmental Policy                                | <input checked="" type="checkbox"/> |
| <i>Gold Phase - Operating</i>                           |                                     |
| 3.1 Institutional Roles, Responsibilities & Authorities | <input checked="" type="checkbox"/> |
| 3.2 Competence & Awareness                              | <input checked="" type="checkbox"/> |
| 3.3 Communication                                       | <input checked="" type="checkbox"/> |
| 3.4 Documented Information                              | <input checked="" type="checkbox"/> |
| 3.5 Operational Planning & Control                      | <input checked="" type="checkbox"/> |
| 3.6 Emergency Preparedness & Response                   | <input checked="" type="checkbox"/> |
| <i>Platinum Phase – Checking &amp; Correcting</i>       |                                     |
| 4.1 Monitoring, Measuring, Analysis & Evaluation        | <input checked="" type="checkbox"/> |
| 4.2 Evaluation of Compliance                            | <input checked="" type="checkbox"/> |
| 4.3 Non-Conformity & Corrective Action                  | <input checked="" type="checkbox"/> |
| 4.4 Internal Audit                                      | <input checked="" type="checkbox"/> |
| 4.5 Management Review                                   | <input checked="" type="checkbox"/> |



## Internal Audit Report Form - Executive Summary

### Audit Outcome:

**Major N/Cs:**

**Minor N/Cs:** 3

**Opportunities for improvement:** 6

### Comments of the assessment team:

An internal audit of the Arts University Bournemouth's (AUB) environmental management system (EMS) was conducted to determine the extent to which it conforms with the requirements of ISO14001:2015. The EMS is led by Campus Services who work closely with other departments and the Environment Committee.

The system provides an effective level of control of environmental risk at AUB. The organisation's context is well defined, leadership has been effectively demonstrated and commitment levels are evident. This is reflected in the Sustainability Plan and through operational control of risk areas.

The audit involved a review of all system processes and documentation and a tour of the photography department. Evidence is clearly available to demonstrate that the key requirements of the standard are being achieved including identification of environmental risks and opportunities associated with environmental aspects, fulfilment of compliance obligations; setting of objectives to achieve continual improvement and enhance performance; operational control of risks to protect the environment and prevent pollution.

**Signature:**

**Title:** EcoCampus Project Manager

**Date:**



## Internal Audit Report Form – Audit Findings Summary

| Ref No   | Clause No | Details of non-conformances or OFIs raised  | Type      |
|----------|-----------|---|-----------|
| OFI 1    | 2.1       | The EMS index should be updated to state that the Compliance Obligations Register is updated at least annually.   | OFI       |
| OFI 2    | 2.1       | The compliance obligations register should be updated to include:<br>- The 2016 Environmental Permitting Regulations rather than the 2012 regulations;<br>- Mandatory sector requirements such as the HESA EMR returns, as listed within the Log of Interested Parties. | OFI       |
| OFI 3    | 2.2       | The process for assessing significance should be documented within the EMS Index.   | OFI       |
| Min NC 1 | 2.2       | After reviewing the aspects register it was noted that some of the aspects have not been highlighted as having a compliance risk where they should.   | Minor N/C |
| OFI 4    | 2.3       | The SCSO should ensure that the actions identified within the aspects register to address risks and opportunities are up to date.   | OFI       |
| OFI 5    | 3.2       | The SCSO should ensure that a date for spill training with technicians is set prior to the ISO14001 certification audit.  | OFI       |
| MIN NC 2 | 4.3       | Although the university has addressed non-conformities raised throughout EcoCampus audits, there is no register of nonconformities and associated corrective actions.   | Minor N/C |
| OFI 6    | 4.3       | The non-conformities and OFI's raised during internal and external audits should be added to the register of non-conformities including details of corrective actions having been implemented and checked for effectiveness.  | OFI       |
| MIN NC 3 | 4.4       | The university has not developed an audit program as required by the clause 4.4 or ISO14001:2015 clause 9.2.2.  | Minor N/C |

**Closure of Findings from EcoCampus Gold Audit AUB – 03 on the 10/04/2019:**

| <b>Clause No</b> | <b>Details of Non-Conformances (NCs) or Opportunities for Improvement (OFIs) raised.</b>  | <b>Status</b> |
|------------------|---|---------------|
| OFI 1            | <i>The roles and responsibilities register does not list the roles and responsibilities for key operational staff such as cleaners, technicians and security. The register should be updated to reflect the operational staff.</i>  | <b>Closed</b> |
| Evidence         | The roles and responsibilities register has been updated and includes:<br>- Churchills (cleaning contractors) – Responsible for emptying bins plus cleaning up non-haz spills.<br>- Technical operations managers – responsible for ensuring technicians are able to deal with haz chemicals, spills and encouraging sustainability.<br>- Technician demonstrators – deal with haz chemicals, spills and encouraging sustainability.<br>- Security team – ensuring waste compounds are locked and aware of spill procedure. |               |
| OFI 2            | <i>The SCSO should review the content of the Environmental Awareness training module on Praxis to determine whether it is up to date and relevant to the current practice at the university.</i>  | <b>Closed</b> |
| Evidence         | The SCSO has been unable to access the Environmental Awareness module of the Praxis course, however, environmental awareness is completed through the university environmental induction conducted by the SCSO.   |               |
| OFI 3            | <i>The SCSO should determine whether Churchill's staff have been training on dealing with external spills of hazardous substances.</i>  | <b>Closed</b> |
| Evidence         | Training records viewed for Churchills staff include:<br>- COSHH toolbox talks covering the basics of COSHH, risk assessment processes, storage and labelling of chemicals.<br>- Environmental awareness toolbox talk covering general issues such as energy, water, waste, spillages, control measures and procuring efficient products. Also explains what staff should do to manage waste, water, chemicals, spillages, energy, CO2 (travel) etc.  |               |
| OFI 4            | <i>The university should consider how to communicate about its environmental performance and achievements to staff and students.</i>  | <b>Closed</b> |
| Evidence         | The university sustainability web pages have recently been updated and include a comprehensive range of information, including information about its environmental performance.   |               |
| OFI 5            | <i>The Environment Committee acts as the management review for the EMS however, the meetings do not fully satisfy the requirements of Platinum clause 4.5. The university should consider adding agenda items to the Management review committee meeting. The EcoCampus Management Review Agenda template is recommended.</i>   | <b>Closed</b> |
| Evidence         | Minutes from the environment committee meeting on the 31 <sup>st</sup> May 2019 confirm that the meeting to be held in October 2019 will include agenda items required by the clause.   |               |

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|----------|---|---------------|
| OFI 6    | <i>The university should determine how environmental requirements, stipulated in contracts are monitored and managed once contracts have been awarded.</i>  | <b>Closed</b> |
| Evidence | The SCSO explained how contractor requirements are managed through:<br><ul style="list-style-type: none"> <li>- quarterly waste contractor meetings – SCAG</li> <li>- meetings with the bus company at Bournemouth University</li> <li>- Catering operational meeting – raised actions on coffee cup recycling &amp; surcharge for cups.</li> <li>- Contractor meetings with Churchills and the HOCS.</li> <li>- Construction contractor meetings – environmental specifications managed through BREEAM achievements.</li> </ul>  |               |
| OFI 7    | <i>The SCSO should consider developing an operational control procedure(s) to summarise how key environmental risk areas are controlled. Areas include waste/hazardous waste, energy, control of hazardous substances, and air-conditioning/refrigeration maintenance. The document should explain:</i><br><ul style="list-style-type: none"> <li>- who is responsible for each area;</li> <li>- physical control measures such as bins, cabinets or bunds;</li> <li>- how compliance is achieved with reference to applicable records such as waste transfer notes or air-conditioning maintenance records;</li> <li>- how data is managed and used to monitor environmental performance.</li> </ul> | <b>Closed</b> |
| Evidence | Written operational control have been developed for areas of environmental risk including waste, energy water, emissions, construction and contractor control.  |               |
| OFI 8    | <i>The ‘Guide for chemical spill response planning’ should be updated to explain how contaminated spill kit and hazardous materials should be disposed of as hazardous waste.</i>   | <b>Closed</b> |
| Evidence | The Guide for Spill response planning has been updated recently and covers the steps taken to address spillages including bagging up, labelling and disposing of contaminated materials as hazardous waste.   |               |
| OFI 9    | <i>The SCSO should conduct and document an environmental risk assessment of the areas and routes where hazardous substances are stored and transported and identify where hazardous substances would end up if a spill occurs.</i>  | <b>Closed</b> |
| Evidence | The SCSO recently conducted risk assessments for spillages from transportation of chemicals from the campus and workshops to the waste compound. The assessment indicated that there is a very low risk of spillage due to the limited chemical use, short distance to travel and use of suitable containers on site.   |               |
| OFI 10   | <i>A spill kit is located within the hazardous waste compound. In the event of a spillage the campus services team will be notified, however staff including cleaners and technicians have no had formal spill response training.</i>   | <b>Open</b>   |
| Evidence | Spill training was scheduled with technicians for the week of the 26 <sup>th</sup> Aug however this was postponed as the SCSO and technicians agreed that transportable spill kits would be purchased for individual areas, and training would commence once these were   |               |

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|          | obtained. Spill kits are to be provided for the post room, photography department, workshops and haz waste store. An email, sent by the SCSO to the technicians on the 3 <sup>rd</sup> Sept 2019, confirmed the purchase of the spill kits and plan to re-schedule spill training. |             |
| OFI 11   | <i>To satisfy the requirements of ISO 14001, emergency response procedures should be tested periodically. The university should consider conducting a mock spill as part of spill response training.</i>   | <b>Open</b> |
| Evidence | The testing of emergency procedures is to be conducted as part of the spill training discussed in section 3.2.   |             |



## Internal Audit Report Form – Audit Trace Record Form

| Clause No | Audit Findings and Comments   | Type |
|-----------|---|------|
| I.1       | <p><b>Leadership and commitment</b></p> <p><u>Document(s) audited:</u><br/>Governance for Environmental Sustainability<br/>Minutes from Environmental Committee meeting 31/05/2019</p> <p><u>Comments:</u><br/>The document ‘Governance for Environmental Sustainability’ describes the university’s management structure and a separate reporting structure for the EMS. Discussions held with the Senior Campus Services Officer (SCSO) confirm that the Environment Committee consists of 3x members of senior management, academics, faculty managers, and representatives from procurement, IT and the SU. Senior management representatives are the University Secretary, the Head of Campus Services (HOCS) and the Head of Digital Services, who all sit on the university leadership team (ULT). The Environment Committee meets three times a year. Minutes from the Environment Committee from the 31<sup>st</sup> May 2019 confirms topics discussed including the EcoCampus Gold award, an update of the sustainability plan and actions to improve environmental communications.<br/>Senior Management Commitment was further assessed by interview of the Head of Campus Services during the Silver and Gold phase EcoCampus audits.<br/><br/>Evidence viewed confirms senior management commitment for the EMS.</p> |      |
| I.2       | <p><b>Context of the institution</b></p> <p><u>Document(s) audited:</u><br/>Governance for Environmental Sustainability<br/>PESTLE analysis<br/>Log of interested parties<br/>EMS Index</p> <p><u>Comments:</u></p>   |      |

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|                   | <p>Environmental risks and opportunities have been determined through a PESTLE analysis. The SCSO completed the analysis in 2018 which was presented to the Environmental Committee for review. Minutes from the committee meeting on the 15.02.18 confirm that the committee noted the PESTLE analysis which sets out risks and opportunities against a range of factors. The analysis includes an action plan which indicates how the university intends to address the risks and opportunities where possible.</p> <p>The log of interested parties lists interested parties such as students, staff, funding bodies, contractors (Churchill (cleaners), Mitie (Security), Suez (Waste contractor), Chartwell (catering)), regulators and NGO's. Parties have been assessed within a risk matrix which considers the 'level of interest' and 'influence from the university' and stipulates how they should be managed under 4x categories: 'Keep Satisfied', 'Manage Closely' 'Monitor', 'Keep Informed'.</p> <p>The scope of EMS is documented with the EMS Index and the document 'Governance for Environmental Sustainability'. The scope covers:<br/> <i>"All AUB buildings used for educational and residential purposes. This will be inclusive of buildings owned and leased, directly managed by third party on the AUB's behalf. The scope does not include residential buildings that are owned and managed by a third party."</i></p> <p>Evidence viewed confirms that the university has determined the risk and opportunities associated with its context, identified interested parties and set the EMS scope.</p> |              |
| <p><b>2.1</b></p> | <p><b>Compliance Obligations</b></p> <p><u>Document(s) audited:</u><br/> Compliance Obligations Register</p> <p><u>Comments:</u><br/> The Compliance Obligations register was last updated in October 2018. The register uses the EcoCampus template to list legal requirements by category such as emissions, energy, waste and water. The process for keeping up to date with legal requirements is documented within the EMS Index. It was noted that the frequency in which the compliance obligations register is to be updated is not documented within the index. The register describes the legislative requirements and includes further information relating to responsibilities and licences.</p> <p><b>The EMS index should be updated to state that the Compliance Obligations Register is updated at least annually.</b></p>   | <p>OFI I</p> |



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|     | <p>It was noted that the legal register referred to legislation that has been updated and did not include other requirements such as mandatory sector reporting of environmental data.</p> <p><b>The compliance obligations register should be updated to include:</b></p> <ul style="list-style-type: none"> <li>- <b>The 2016 Environmental Permitting Regulations rather than the 2012 regulations;</b></li> <li>- <b>Mandatory sector requirements such as the HESA EMR returns, as listed within the Log of Interested Parties.</b></li> </ul>  | OFI 2                          |
| 2.2 | <p><b>Environmental Aspects</b></p> <p><u>Document(s) audited:</u><br/>Environmental Aspects Register<br/>EMS Index</p> <p><u>Comments:</u><br/>The environmental aspects register was last updated by the SCSO in October 2018. The register uses the EcoCampus template to identify aspect areas, aspects and their associated impacts. Aspects are assessed for significance by allocating scores against 'severity of impact' and 'frequency/likelihood of occurrence' to give a 'significance' score. In addition, aspects that have an associated compliance risk are automatically highlighted. The EMS Index explains how aspects are identified however does not stipulate the methodology for assessing their significance.</p> <p><b>The process for assessing significance should be documented within the EMS Index.</b></p> <p>Aspects were reviewed for consistency with the methodology.<br/><b>After reviewing the aspects register it was noted that some of the aspects have not been highlighted as having a compliance risk where they should.</b><br/>The aspects that should be reviewed to show the associated compliance risk are:</p> <ul style="list-style-type: none"> <li>- A14 Use of refrigerants</li> <li>- A10 Use and storage of chemicals</li> <li>- A22 noise and vibration</li> <li>- A23 to 27 waste management.</li> </ul> <p>The register includes a 'life cycle analysis' which describes the actions to address the life cycle stages, where applicable, to each aspect. In addition, it was noted that the aspects identified relate to the life cycle stages of the university's activities including design of buildings, procurement of goods, transport, use of facilities &amp; resources and the treatment/disposal of waste.</p> | <p>OFI 3</p> <p>Minor NC 1</p> |

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|                   | <p>Risks and opportunities associated with aspects have been identified. Risks include breaches of legislation, increased costs, pollution and loss of biodiversity. Opportunities include improved efficiency, use of renewables/new technology and greater reuse/recycling.</p>  |              |
| <p><b>2.3</b></p> | <p><b>Planning Action</b></p> <p><u>Document(s) audited:</u><br/>EMS Index</p> <p><u>Comments:</u><br/>A list of actions has been developed to show how the university intends to address risks and opportunities associated with its environmental aspects. The SCSO indicated that the actions have not been updated since October 2018 and some of them have since been completed.<br/><b>The SCSO should ensure that the actions identified within the aspects register to address risks and opportunities are up to date.</b></p>   | <p>OFI 4</p> |
| <p><b>2.4</b></p> | <p><b>Environmental Objectives</b></p> <p><u>Document(s) audited:</u><br/>Environmental Objectives, KPI's and action planner<br/>Sustainability Plan 2015-20</p> <p><u>Comments:</u><br/>Environmental objectives are listed within the 'Environmental Objectives, KPI's and Action Planner. The objectives relating to emissions and waste originate from the Sustainability Plan 2015-20. Actions to address these targets are documented within the Carbon Management Plan. Discussion were held with the SCSO about progress towards objectives and targets relating to carbon, waste, water, transport and biodiversity.</p> <p><u>Carbon emissions</u><br/>The university has set an objective to reduce carbon emissions by 40% per head by 2020 against 2005/06 baseline to 0.336 TCO<sub>2</sub> per head. The SCSO provided data showing a 28% reduction in total emissions. A 'Sustainability Plan Progress report' presented to the environment committee shows that emission per head in 2017/18 were 0.227 per head, therefore the university is on track to achieve its target.<br/>Completed projects discussed include:<br/>- Lighting upgrade to LED<br/>- BMS upgrade<br/>- Pipework insulated.<br/>The university is also looking to replace boilers in the North building plant room.</p> |              |

Waste

The university has set a target to achieve a 40% recycling by 2020. The university is performing well above this rate with a current 59% recycling rate. A waste audit bin assessment was conducted to assess the composition of waste disposed of in 8x bins for general waste and recycling. The analysis shows that within general waste bins 14.3% was card and 15.6% were plastics both of which could be recycled.

Water

The objectives for water come under the emissions reduction objectives. It was noted that the university is in talks with Bournemouth water to install submetering with monitoring software.

Transport

The objectives associated with transport are captured by the carbon objectives. It was noted that the university has started to offset its emissions associated with transport.

Biodiversity

The university has a Biodiversity Action Plan, however this is used as a guide rather than operational plan with actions. The plan was completed in December 2016 and included a habitat survey with action plan. Some of the actions have been acted upon including installation of green roof. The SCSO intends to develop further actions as part of the Sustainability Plan review.

Sustainability plan 2015-20

The current Sustainability Plan expires at the end of 2020 and the SCSO explained that the Environmental Committee ran a separate meeting to discuss how the new targets for the revised plan would be developed. Four people have been identified to set the new targets and meetings are to be held to progress this further.

Objectives and targets have been set for key environmental risk areas and evidence was provided to show how these are being addressed.

2.5

**Environmental Policy**

Document(s) audited:  
AUB Environment Policy

Comments:

The university's Environmental Policy was reviewed and updated in January 2019 and signed by the Principal and Vice-Chancellor. The Policy meets the requirements of the ISO14001 standard in that it includes commitments to:

- the protection of the environment, including prevention of pollution
- fulfil its compliance obligations

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|                   | <p>- continual improvement of the environmental management system to enhance environmental performance.</p> <p>The policy is communicated through the university's website.</p>  |  |
| <p><b>3.1</b></p> | <p><b>Institutional Roles, Responsibilities and Authorities</b></p> <p><u>Document(s) audited:</u><br/>3.1.1 Institutional Roles, Responsibilities and Authorities Roles, Responsibilities &amp; Training Register</p> <p><u>Comments:</u><br/>Procedure 3.1.1 Roles, Responsibilities &amp; Authorities states that the SCSO and HOCS are responsible for determining responsibilities of staff relevant to the EMS. SCSO and HOCS responsibilities also include:</p> <ul style="list-style-type: none"> <li>- responsibility and authority for establishing, implementing and maintaining the EMS in accordance with the requirements of the Scheme.</li> <li>- responsibility for annually reporting on the performance of the EMS to the Environment Committee, as well as making recommendations for improvement.</li> </ul> <p>The 'Roles and responsibilities register' was assessed during the EcoCampus Gold audit. Roles of staff relevant to environmental management including senior management, management, academic and operational staff. The OFI below was raised during the Gold audit:<br/><i>"The roles and responsibilities register does not list the roles and responsibilities for key operational staff such as cleaners, technicians and security. The register should be updated to reflect the operational staff."</i></p> <p>The roles and responsibilities register has been updated to include:</p> <ul style="list-style-type: none"> <li>- Churchills (cleaning contractors) – Responsible for emptying bins plus cleaning up non-haz spills.</li> <li>- Technical operations managers – responsible for ensuring technicians are able to deal with haz chemicals, spills and encouraging sustainability.</li> <li>- Technician demonstrators – deal with haz chemicals, spills and encouraging sustainability.</li> <li>- Security team – ensuring waste compounds are locked and aware of spill procedure.</li> </ul> |  |
| <p><b>3.2</b></p> | <p><b>Competence and Awareness</b></p> <p><u>Document(s) audited:</u><br/>3.2 Competence and awareness Roles, Responsibilities &amp; Training Register</p> <p><u>Comments:</u></p>   |  |

Procedure '3.2.1 Competence and Awareness' explains the process for communicating responsibilities of roles to relevant individuals within the EMS. Training requirements are identified and documented within the Roles, Responsibilities and Training Register.

Completed training was assessed during the EcoCampus Gold audit. Evidence of training included the environmental induction and COSHH training for technicians and an online environmental awareness module hosted on the university's H&S training software called Praxis. The SCSO was unable to access the Environmental Awareness module of the Praxis course, however, environmental awareness is completed through the university environmental induction.

Spill training was scheduled with technicians for the week of the 26<sup>th</sup> Aug however this was postponed as the SCSO and technicians agreed that transportable spill kits would be purchased for individual areas, and training would commence once these were obtained. Spill kits are to be provided for the post room, photography department, workshops and haz waste store. An email, sent by the SCSO to the technicians on the 3<sup>rd</sup> Sept 2019, confirmed the purchase of the spill kits and plan to re-schedule spill training.

**The SCSO should ensure that a date for spill training with technicians is set prior to the ISO14001 certification audit.**

The contractor Churchills provide staff and cleaning services to the university. Training records for Churchills staff include:

- COSHH toolbox talks covering the basics of COSHH, risk assessment processes, storage and labelling of chemicals.
- Environmental awareness toolbox talk covering general issues such as energy, water, waste, spillages, control measures and procuring efficient products. Also explains what staff should do to manage waste, water, chemicals, spillages, energy, CO2 (travel) etc.

OFI 5

**3.3**

**Communication**

Document(s) audited:

3.3.1 Internal and External Communications  
 AUB website  
 Contractor induction process  
 Email evidence

Comments:

Procedure '3.3.1 Internal and External Communications' describe the communications channels, website and process for dealing with enquiries and complaints. The university sustainability web pages have recently been updated and include a comprehensive range of information, including information about its environmental performance, under the following headings:

- Environmental sustainability,
- Sustainable resource management

- Student engagement
- Energy, carbon and water
- Travel
- Governance, policies and plans
- Fairtrade & food
- Being sustainable on a student budget
- A green interview with James Jackson: Senior Campus Services Officer.

The main page of the website also includes the key environmental policy commitments. The site will be used to promote sustainability related stories through the 'Green News' section, some of which have been uploaded including celebrating the EcoCampus Gold award and planting 1000 trees at Upton Park. It was noted that the AUB student union have uploaded a document called 'Greenzine', which covers a range of issues such as plastics, meat, palm oil and shopping sustainably. The SCSO discussed the provision of a TV screen at the entrance of the Arts Bar, which will be used to display information on environmental performance including recycling rates.

The SCSO maintains a folder for environmental related communications. This included recent emails to technicians confirming the new spill procedure and completed risk assessment for spills. The SCSO explained how contractor requirements are managed through:

- quarterly waste contractor meetings – SCAG
- meetings with the bus company at Bournemouth University
- Catering operational meeting – raised actions on coffee cup recycling & surcharge for cups.
- Contractor meetings with Churchills and the HOCS.
- Construction contractor meetings – environmental specifications managed through BREEAM achievements.

Further evidence of communications was assessed in detail during the EcoCampus Gold audit.

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| <b>3.4</b> | <b>Documented Information</b>   |  |
|            | <p><u>Document(s) audited:</u><br/>3.4.1 Documented information<br/>EMS folder structure</p> <p><u>Comments:</u><br/>Procedure '3.4.1 Documented Information' states that the SCSO is responsible for maintaining the EMS document system. The EMS documents are stored on the EcoCampus EMS Documentation System. Procedures include details of the author, approver, review date and a separate table for version control. All procedures viewed included version control, the author and approver.</p> |  |
| <b>3.5</b> | <b>Operational Planning and Control</b>   |  |

Document(s) audited:

- 3.5.1 Operational Control
  - 3.5.2 Waste management
  - 3.5.3 Hazardous waste management
  - 3.5.4 Discharges to water
  - 3.5.5 Emissions to air
  - 3.5.6 Energy management
  - 3.5.7 Construction
  - 3.5.9 Contractor control
- Health & Safety Contractor Induction

Comments:

Discussion held with the SCSO about operational controls for areas of environmental risk including waste, energy, hazardous substances and emissions to air. It was noted that written operational controls have been developed for waste, energy water, emissions, construction and contractor control.

A tour of the photography department was conducted with a technician who explained the processes for managing hazardous substances from purchase to disposal. The process is as follows:

- Chemicals purchased are delivered directly to the chemical storeroom. The store has an inventory on the door which shows the hazardous properties. Only technicians have access to the store. Ilford RT rapid film developer Part A was stored in labelled bottles on shelving. The store provides separate areas for different chemical types including flammables and oxidising materials.
- Material safety data sheets (MSDSs) are obtained for all chemicals purchased which are used to develop risk assessments (RA). Copies of MSDS and RA viewed for Ilford RT rapid film developer Part A. It was noted that all RA's are currently under review prior to the start of the new term.
- Chemicals are transported to required areas, for use within the photography machinery and the dark room.
- Mixing instructions describe the process for mixing. Chemicals are mixed in the mixing room within a measuring tank with exhaust fume head. Once mixed chemicals are automatically fed into containers, reducing the risk of spillages. PPE is available. The mixing room also houses a sink.
- The department has 4x film processors. A Colenta C41 film processor was viewed in which Ilford RT rapid film developer is used. At the end of the process the developer is diluted and washed directly to drain. Equipment pipework is labelled with the relevant chemicals. It was noted that only very low concentrations of developer are disposed of via drain.
- Waste bleach and fixer are transferred into 25L labelled containers for disposal as hazardous waste. It was noted that the technicians

check the containers daily to ensure they do not overflow. The rate of flow is minimal, so the containers do not fill quickly.

- The dark room was viewed which has extractor fans and chemicals stored in labelled drums. Waste chemicals are stored in drums for collection.

- Waste collections are arranged by the technicians through J&G Environmental, and the SCSO stores copies of the consignment notes.

Small spillages are cleaned up using paper towels which are disposed of as hazardous waste. It was noted that the department is awaiting a spill kit.

The processes observed for control of hazardous substances appear effective and the technician was clearly knowledgeable of the process.

Discussions held with the SCSO on documented operational control procedures:

- 3.5.1 Operational Control
- 3.5.2 Waste management
- 3.5.3 Hazardous waste management
- 3.5.4 Discharges to water
- 3.5.5 Emissions to air
- 3.5.6 Energy management
- 3.5.7 Construction
- 3.5.9 Contractor control.

Procedure '3.5.1 Operational control' is a general procedure explaining responsibility for establishing and implementing operational controls which lies with the SCSO.

Procedure '3.5.2 Waste management' describes the process for managing non-hazardous waste and recycling. Responsibilities listed include the SCSO, waste porters, cleaners and all staff. It includes a process flow explaining where waste is generated, stored and disposed. Waste stream storage requirements are listed, and a waste inventory shows EWC codes, waste carriers' licences and expiry dates for individual waste streams. The procedure confirms the processes for waste storage, disposal and record keeping assessed during the EcoCampus Gold audit.

Procedure '3.5.3 Hazardous Waste Management' describes the responsibilities for the SCSO, technicians and waste porters. Waste streams listed are batteries, fluorescent tubes, chemicals and WEEE. The procedure explains all requirements for the control of hazardous waste including storage, disposal and record keeping. This adheres to the processes, including review of storage and consignment notes, assessed during the EcoCampus Gold audit.



Procedure '3.5.4 Discharges to water' indicates that the site does not have an environmental permit or consent to discharge therefore no evidence was viewed.

Procedure '3.5.5 Emissions to air' lists responsibilities including the Facilities Manager, campus services team, appointed air-conditioning maintenance contractor and workshop technicians. The procedure describes the air-conditioning/refrigeration maintenance through the contractor. The process explains how equipment maintenance is scheduled and monitored through the Effective software. Thresholds for leak testing are described. An asset register is managed by the SCSO which includes the type, quantity, Global warming potential and CO<sub>2</sub>e of F-gas stored within each piece of equipment. The procedure confirms the process for ensuring compliance with the F-Gas Regulations which was assessed during the EcoCampus Gold audit.

Procedure '3.5.6 Energy management process' lists responsibilities including the HOCS, SCSO and Senior Health and Safety Officer. The procedure explains BMS controls for heating & cooling, manual meter readings, energy monitoring processes and completion of DEC's. The procedure refers to the Carbon Management Plan (CMP) 2018 - 2021 which was discussed with the SCSO. Actions and potential projects discussed include:

- LED lighting - completed;
- Solar car ports – not completed;
- Vehicle replenishments – completed and electric vehicles purchased;
- Pipe insulation & BMS upgrade - completed
- Other projects considered include reducing cooling in server rooms, moving to laptops from desktops, installation of a CHP plant (not viable). The university is also considering the feasibility of ground source heat pumps.

Procedure '3.5.7 Construction' lists responsibilities including the HOCS, Project board and Project team (design, demolition and construction phases), SCSO, HOCS, Facilities Managers and BREEAM Assessor. The procedure outlines processes such as detailing specifications and invitations to tender.

**Procedure 3.5.7 Construction should be update to:**

- **include the university objective to achieve BREEAM very good on all new builds;**
- **remove the reference to setting sustainability targets for each project, as this is not conducted in practice.**

Procedure '3.5.9 Contractor control' lists responsibilities for controlling contractors. The SCSO explained contractor controls including risk assessments, method statements, permits to work and qualification requests. It was noted that qualification requests are not conducted for small contractors. The 'Contractor Health & Safety Site Induction' was viewed which includes the university's requirements for

OFI 6

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|                   | <p>COSHH, waste and environmental incidents. The induction also explains:</p> <ul style="list-style-type: none"> <li>- hazardous substances are not to be disposed of into drains</li> <li>- waste must be removed by contractors</li> <li>- who to contact in the event of a spillage.</li> </ul> <p>Operational controls were assessed further during the EcoCampus Gold audit where physical controls such as bunding and waste storage areas were observed.</p>  |  |
| <p><b>3.6</b></p> | <p><b>Emergency Preparedness and Response</b></p> <p><u>Document(s) audited:</u><br/> 3.6.1 Emergency preparedness and response<br/> Guide for chemical spill response planning</p> <p><u>Comments:</u><br/> Procedure 3.6.1 Emergency preparedness and response states that the SCSO and Senior Health and Safety Officer ensure risk assessments are reviewed and revised annually to identify all potential accident and emergency scenarios. The SCSO recently conducted risk assessments for spillages from transportation of chemicals from the campus and workshops to the waste compound. The assessment indicated that there is a very low risk of spillage due to the limited chemical use, short distance to travel and use of suitable containers on site.</p> <p>The ‘Guide for chemical spill response planning’ has been updated recently and covers the steps taken to address spillages including bagging up, labelling and disposing of contaminated materials as hazardous waste.<br/> Steps include<br/> – person transporting the chem is responsible except for post room delivery.</p> <ul style="list-style-type: none"> <li>- Make area safe, use first aid,</li> <li>- prevent further contamination – encircle drain,</li> <li>- clean up using pads in spill kit.</li> <li>- Place in bags, label and take to COSHH cabinet.</li> <li>- Report to SCSO.</li> </ul> <p>The testing of emergency procedures is to be conducted as part of the spill training discussed in section 3.2.</p> |  |
| <p><b>4.1</b></p> | <p><b>Monitoring, Measuring, Analysis and Evaluation</b></p> <p><u>Document(s) audited:</u><br/> 4.1.1 Monitoring, measuring, analysis and evaluation<br/> Annual report 2017/18</p> <p><u>Comments:</u></p>   |  |

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|                   | <p>Procedure 4.1.1 Monitoring, measuring, analysis and evaluation explains how the university monitors and reports environmental performance. The Annual report is completed by the SCSO and provides an overview of:</p> <ul style="list-style-type: none"> <li>- emissions from utility usage (elec, gas and water consumption)</li> <li>- waste produced and recycled.</li> <li>- Emissions staff and student commuting.</li> </ul> <p>The SCSO explained how data is gathered and analysed:</p> <ul style="list-style-type: none"> <li>- Energy data is gathered using invoices and some manual meter readings.</li> <li>- Water consumption is monitored through invoices.</li> <li>- Waste data is provided by the waste contractors.</li> <li>- Travel data on deliveries, vehicle use, flights and trains is provided by finance.</li> </ul> <p>Spreadsheets were viewed for waste, energy and travel data which the SCSO uses to monitor performance against targets. For example, data confirmed that the university is currently achieving a 59% recycling rate.</p> <p>Performance against objectives is discussed further in section 2.4 of this report.</p> |  |
| <p><b>4.2</b></p> | <p><b>Evaluation of Compliance</b></p> <p><u>Document(s) audited:</u><br/>EcoCampus Silver and Gold audits</p> <hr/> <p><u>Comments:</u><br/>Evaluation of compliance was conducted as part of the EcoCampus Silver and Gold audits. Legal requirements relating to the following areas were assessed:</p> <ul style="list-style-type: none"> <li>- Waste</li> <li>- Energy</li> <li>- COSHH</li> <li>- F-Gas.</li> </ul>   |  |
| <p><b>4.3</b></p> | <p><b>Nonconformity and Corrective Action</b></p> <p><u>Document(s) audited:</u><br/>4.3 Nonconformity and Corrective Action<br/>Incident report form</p> <hr/> <p><u>Comments:</u><br/>Incidents are to be reported to the SCSO using the Environmental Incident report form. The form has three sections:</p> <ul style="list-style-type: none"> <li>- Part A - incident details, date, time, description</li> <li>- Part B - Corrective action, person responsible, date</li> <li>- Part C - Incident closed out, signature.</li> </ul> <p>No incidents have been reported through the EMS to date.</p>  |  |

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|     | <p><b>Although the university has addressed non-conformities raised throughout EcoCampus audits, there is no register of nonconformities and associated corrective actions. The non-conformities and OFI's raised during internal and external audits should be added to the register of non-conformities including details of corrective actions having been implemented and checked for effectiveness.</b></p>                     | <p>Minor NC 2</p> <p>OFI 6</p> |
| 4.4 | <p><b>Internal Audit</b></p> <p><u>Document(s) audited:</u><br/> 4.4.1 Internal audit<br/> AUB Silver Audit Report – AUB-02<br/> AUB Gold Audit Report – AUB-03</p>  | MIN NC 3                       |
|     | <p><u>Comments:</u><br/> This audit is the first internal audit of the EMS, however two further EcoCampus audits have been conducted.<br/> <b>The university has not developed an audit program as required by the clause 4.4 or ISO14001:2015 clause 9.2.2.</b></p>   |                                |
| 4.5 | <p><b>Management Review</b></p> <p><u>Document(s) audited:</u><br/> Minutes from Environmental Committee meeting 31/05/2019</p>  |                                |
|     | <p><u>Comments:</u></p> <p>The management review is to be conducted by the Environment Committee. Minutes from the environment committee meeting on the 31<sup>st</sup> May 2019 confirm that the meeting to be held in October 2019 will include agenda items required by the clause.<br/> The current environment committee agenda cover carbon management including an update of performance against the sustainability plan.</p> |                                |