

KING'S COLLEGE LONDON
ENVIRONMENTAL MANAGEMENT SYSTEM



Title: **ENVIRONMENTAL & ENERGY MANAGEMENT AUDITS**

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Approved By:

1.0 PURPOSE:

- 1.1 To determine whether the College's Environmental Management System (EMS) and Energy Management System (EnMS) conform to planned arrangements for environmental & energy management, including the requirements of EcoCampus and BS EN 16001:2009.

2.0 SCOPE:

- 2.1 This procedure applies to all clauses of the College's EMS and EnMS.

3.0 DEFINITIONS:

- 3.1 **Competence:** EMS/EnMS audits should only be carried out by competent persons. To this end the College requires such staff to meet the following criteria:
- Possess an appropriate auditing certificate.
 - Have sufficient knowledge and understanding of the area being audited.
 - Be independent of the area being audited.
- 3.2 **Non-conformance:** reported via the auditor when the objective evidence of an auditor reveals that activities are:
- not in compliance with the relevant components of the EMS/ EnMS,
 - the EMS/ EnMS are not being implemented effectively, or,
 - the EMS/EnMS as implemented do not comply with the requirements of the respective standards.
- 3.3 **Responsible parties:**
The relevant School/ Directorate/ area managers who are being audited. The responsible parties must cooperate with any auditors and this procedure.

4.0 PROCEDURE:

- 4.1 Annual Audit Schedule will be established by the:
- Energy & Environment Manager (E&EM) to ensure that all clauses of the College's EMS are audited.
 - Energy Officer (EO) to ensure that all clauses of the College's EnMS are audited.
- 4.2 For internal audits, the intervals between auditing a particular area or element will vary between one year and three years dependent on the significance of the associated environmental and/or energy aspects, as well as previous audit findings and non-conformities.
- 4.3 An internal audit will be undertaken in the following manner:
- The E&EM/ EO will identify the areas/elements that require auditing.
 - At least two weeks before the planned audit competent individual(s) will be assigned to the audit by the E&EM/EO. The E&EM/EO will ensure that auditors are committed to delivering the report before an agreed deadline (within two weeks of completion of the audit) prior to appointment.
 - The auditor will be responsible for planning, preparing and undertaking the audit in accordance with his/her training and the requirements of this procedure and the relevant standards.
 - During the planning stage the results of previous audits and non-conformities will be used to determine the audit scope, this will be discussed and agreed with the E&EM/EO.
 - The auditor will inform the responsible parties of the intention to undertake an audit and discuss the audit scope as necessary. He/she will agree the scope in writing along with a date for the audit..
 - The auditor will meet with the responsible parties at the end of the audit to relay findings and to give an opportunity for factual errors to be corrected.
 - The auditor will submit a written audit report to the responsible parties and to the College Safety Officer, the E&EM and the EO.
- 4.4 External Audits will be arranged on a periodic basis with the appointed external auditors to an agreed programme, this will be included within the Audit Schedule.
- 4.5 It is the responsibility of the E&EM/ EO to ensure that accredited external auditors has been appointed under contract and to ensure that external audits are conducted at a frequency appropriate to the maintenance of the EcoCampus and BS EN 16001 standards.
- 4.6 The findings of all EMS audits will be reported to the Sustainability & Environmental Management Working Group on a quarterly basis by the E&EM. EnMS audits will be reported annually as part of the Management Review.

4.7 Internal Audit Reports

- 4.7.1 The results of the audit will be summarised in an Internal Audit Report (see Appendix A). The E&EM/EO will maintain sequential records of all audits undertaken.

For example, the first audits for both the EMS and EnMS will be referenced as follows:

Environmental Management System audits = AUD.EMS.001

Energy Management System audits = AUD.EnMS.001

- 4.7.2 A signed copy of the audit report will be kept by the E&EM/EO.

4.8 Audit Findings Grades

- 4.8.1 **“A” Major Non Conformance** – identifies a major non-compliance with regulatory or internal standards, presents a potential interruption of the College’s ability to operate, or represents a significant risk to human health or the environment. When the assignment of an “A” level observation is confirmed, the information will be communicated to the respective responsible parties and the Director of Estates and Facilities. Interim corrective actions should be taken immediately and communicated by the responsible parties to the E&EM/EO, College Safety Officer and the Director of Estates and Facilities.

Examples of this level include: bulk storage of dangerous substances without secondary containment that could discharge directly into a river, a major permit violation or failure to submit required CRC documentation.

- 4.8.2 **“B” Minor Non Conformance** – identifies a minor non-compliance with regulatory or internal standards, or represents a minor risk to human health or the environment.

Examples of this level include: not fully implementing a required plan, not being able to demonstrate compliance (unless required by permit) with a regulatory limit with no evidence that the limit is being exceeded, inspections not being completed for <10% of required frequency, the absence of spill protection for laboratory size containers, cracks in secondary containment, documentation not up to date.

A number of non conformances identified against one element of the relevant standard can represent a systematic failure or significant deficiency of the system and a major NC shall be issued.

If audit actions completion dates are further extended more than twice a major NC shall be raised.

- 4.8.3 **“O” Observation** – identifies an issue that requires attention to improve the operation of the EMS and/ or EnMS and that if left un-addressed is likely to lead to a non-conformance during future audits, an example of good environmental practice that deserves recognition or a flag for re-visit at the next audit.

4.9 **Action Plans**

- 4.9.1 For EMS audits the responsible parties of the audited area/ department must prepare an Audit Action Plan (See Appendix B) which must be reviewed and agreed with the E&EM within three weeks of receiving an audit report, to ensure that the responses effectively address the issues noted in the audit and provide sufficient detail of planned actions.
- 4.9.2 For EnMS audits the EO will agree any audit actions and resolution dates with responsible parties and enter these, along with details of the respective NC's and observations, on to EnMSF04 within three weeks of receiving an audit report.
- 4.9.3 Each Audit Action Plan and each item on EnMS04 will include reasonable expected completion dates for all actions.
- 4.9.4 Once the audit actions have been agreed, any change to an Audit Action Plan and/or EnMSF04 requires approval in writing by the respective responsible parties and the E&EM/EO. Details of any changes and their approval must be retained.
- 4.9.5 The responsible parties will ensure that any audit actions are completed against the agreed completion dates.

4.10 **Audit Documentation and Retention**

4.10.1 Audit Documentation

As part of standard audit procedures auditors will review a sample of appropriate policies, procedures, permits, reports, records and programmes based upon risk and potential outcome if there is a non compliance. Copies of documents which act as references upon which an audit observation is based, or against which an observation of the auditor is contrasted, will be retained by the auditor. These will become part of the working papers and notes developed by the auditor.

Where such documentation is lengthy the document may be referenced, noting its title, date, page number, revision number/date, etc., instead.

If any requested documentation is not presented to the auditors within 24 hours of the request the auditors will identify that the respective documentation could not be found within a suitable time, and an observation or non conformance may be generated against documentation control.

CHANGES TO THE PROCEDURE

VERSION	REASON FOR THE CHANGE	DATE
1	New Procedure	July 2010
2	Procedure updated to include auditing of the Energy Management System	October 2010
3	Responsibilities incorporated into 'procedures', and 'moderate' non-compliance grade removed.	January 2011
4	References removed. Responsibility for retention of audit reports changed to E&EM/EO. Definitions reduced. Audit action plans should be agreed with E&EM/EO, Audit Action Plan template added.	June 2011
5	Included responsibility of E&EM/EO for ensuring audit reports are provided by agreed delivery dates and repeat observation classification removed.	July 2011