3.0 EMSP Compliance Checks

1.0 Purpose

Regulatory compliance and good environmental performance are fundamental requirements of an EMS. This procedure will ensure periodic compliance with identified legal and regulatory requirements, manage a schedule of compliance checks and document and manage any non-compliance reports for the scope of the EMS.

2.0 Scope

This document covers all Aspects and Impacts activities and Legal and ‘Other’ requirements of the EMS to set the method by which the EMS will be internally audited. To incorporate review of relevant documents to ensure correct records are maintained, and that relevant EMS documents are controlled correctly.

3.0 Responsibility

It is the responsibility of the Sustainability Manager for Waste and EMS to:

- Ensure the schedule of Compliance Checks is followed and all associated documentation controlled.
- Ensure a suitably trained and/or informed individual(s) shall conduct compliance checks. An independent/neutral individual to the department/area will be chosen to conduct checks wherever possible.
- The Procedure, Schedule, Template and Report are reviewed for relevance and updated in accordance with the environmental aspects at least annually or with relevant changes in legislation, other requirements or University activities.
- Non-conformance reports are followed up with agreed timescales.
- Where required ensure Operational Controls / Procedures and Monitoring requirements are put in place to ensure ongoing compliance.
- Report to the ‘Responsible Person’ as defined in the Legal Register any areas of non-compliance that are defined as ‘major’.
4.0 Documents

4.1 Compliance Checks Schedule
A Compliance Checks Schedule defines the frequency of compliance checks for identified areas. The above schedule is subject to periodic review.

4.2 Compliance Checks Template and Report
A Compliance Checks Template and Report is used to structure the areas of compliance that will be audited during Compliance Checks. This template does not cover every area but acts as a prompt for the audits.

The template and Report will be drawn from the University’s Legal and ‘Other’ Requirements and associated Aspects and Impacts register.

Findings shall be entered as ‘satisfactory’ (no action required), ‘minor non-conformance’ (no action required, but issue will be noted, and if remains outstanding at next audit, will automatically become a major non-conformance); and ‘major non-conformance’ (Effectively, a ‘fail’)

Following Compliance Checks the Template and Report is issued detailing any areas of non compliance and agreed timescales for action. This ‘report’ will also highlight any areas where Operational Controls / Procedures are required.

The ‘report’ will recommend corrective actions for non compliances.

Documents
Compliance Checks Schedule
Compliance Checks Template and Report

Changes to the procedure

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<thead>
<tr>
<th>Version</th>
<th>Reason for Change</th>
<th>Date</th>
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<tbody>
<tr>
<td>2</td>
<td>Change to procedure to reflect merging of Compliance Checks Template and Report</td>
<td>August 2011</td>
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