



Environmental Corrective & Preventive Action Procedure

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Title	Environmental Corrective and Preventive Action Procedure				
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PURPOSE:

The purpose of this procedure is to ensure that any environmental observation, non-conformance or incident is addressed as soon as possible. It defines who has responsibility and authority for ensuring environmental observations, non-conformances or incidents are addressed and that appropriate corrective and preventive action is taken in line with the University's Environmental Management System.

SCOPE:

The procedure covers all environmental observations, non-conformances or incidents. It works alongside the Health & Safety Services Corrective and Preventive Action Procedure.

DEFINITIONS:

Environmental incident

An environmental incident as something that can cause damage to the natural environment which needs to be resolved in the immediate to short-term. It is different to an emergency which needs immediate resolution and is dealt with in our Emergency Response Preparedness Procedure.

Observation

An observation is evidence of a non-conformance which is not a systemic failure of the management system but nevertheless needs to be addressed and/or something that could impact on environmental performance.

Non- conformance

A non-conformance as a significant deviation from work standards, practices, procedures, regulations, management system performance etc. either in number of occurrences or in seriousness. A non-conformance can lead to an environmental incident if not addressed or have a cumulative environmental impact (e.g. contribution to climate change).

Individual observations that are not addressed within a given timescale can also be escalated to non-conformance.

Major Non-conformance

A major non-conformance is triggered by one of the following:

- A failure to take action on a significant non-conformance over an extended period that has a medium-high risk to environmental performance or risks a serious environmental incident if not resolved
- A non-conformance that is likely to lead to a serious environmental incident or significant impact on environmental performance if not addressed immediately
- A non-conformance that is likely to lead to reputational damage if not addressed immediately

Corrective and preventive action

Action taken to eliminate the cause of an identified environmental incident, non-conformance or other undesired situation.

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RESPONSIBILITIES:

Director of Facilities Management: will be informed of any major non-conformance via the Director of Sustainability Services and will ensure adequate resources are made available to resolve the non-conformance.

Director of Sustainability Services: will ensure that Environmental Incidents, Observations and Non-conformances are resolved within the appropriate timescale and will track performance in-between environmental review meetings via reporting the Sustainability Manager. Will oversee responses to major non-conformances to ensure resolution within agreed timescale.

Sustainability Manager supported by Sustainability Service and Health & Safety Service: will respond to any Environmental Incidents, Observations and Non-conformances and ensure that the procedure is followed and will track and report on progress quarterly to the Director of Sustainability Services and annually to the Management Review Group.

All staff and students: are responsible for reporting environmental incidents, adhoc observations and non-conformances.

Internal auditors: are responsible for reporting observations and non-conformances as a result of audits.

REGISTERING AN INCIDENT, OBSERVATION OR NON-CONFORMANCE

Any event that also has health and safety implications must follow the Health & Safety Services Corrective and Preventive Action Process.

Any person who becomes aware of an incident, observation or non-conformance shall record the details via the following methods:

- Via an e-mail sent to sustainability@leeds.ac.uk
- Via EQMS issues manager
- Via Sentinel for environmental incidents only

Any internal auditor who identifies a non-conformance shall report this via the auditing and issue manager modules as part of the University EQMS software.

The following information must be included when reporting:

- Origin or location of the incident, non-conformance or observation
- A description of the incident, non-conformance or observation
- Any immediate corrective action taken to resolve the incident, non-conformance or observation.
- If appropriate, recommendations for long-term preventative action that could prevent a repeat occurrence. This might mean new training or a change to procedures.

Receipt of the incident via EQMS, Sentinel or e-mail will be confirmed by the Sustainability Manager or Health & Safety Manager, and any e-mail correspondence or anything raised via auditing will be added to EQMS as a record.

CORRECTIVE AND PREVENTATIVE ACTION

EQMS will be used to record incidents, non-conformances and observations and the actions taken to avoid recurrence. Actions will be agreed with appropriate responsible parties and an appropriate timescale for implementation agreed, taking into account the level of seriousness of the incident, whether investment is required (accounting for business cases to be developed) and the complexity of resolving the issue.

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Once this has been agreed the actions will be signed off at an Officer/Management level for observations, non-conformances and low level environmental incidents and at a Head of School/Service level for high level environmental incidents.

For a major non-conformance, the Director of Facilities Management, Director of Sustainability Services and other relevant school/service senior management will be informed and appropriate action will be agreed to resolve the issue within a prompt timescale.

FOLLOW UP

The Sustainability Manager will check after the agreed time period that the actions have been implemented and that they are effective, or likely to be in the future at preventing a repeat of the incident, observation or non-conformance. If everything is satisfactory the issue will be signed off. If further actions need to be completed this must be agreed by relevant parties and a new re-view period agreed.

Issues will not be signed off until all suitable actions are in place and are proving to be effective or likely to be so in the future.

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Appendix 1: Examples of Environmental Incidents, Observations and Non-conformances

Environmental incident

- Accidental spillage of small quantities of chemicals
- The inadvertent loss of areas of biodiversity. E.g. inadvertent damage or loss to trees as part of building works.
- Small fires that have led to small scale contamination
- Skipping of furniture or equipment that should have been re-used.

Example observations

- Lighting left on out of hours.
- Air-conditioning running at the same time as heating.
- Over-ordering of chemicals.
- Loss of cycle storage due to building works

Non-conformance

- Contamination of skip with WEEE waste
- Non-certified Timber being used on site
- Procedure not being followed

Major Non-conformance

- Repeated low-level environmental incidents where root cause has not been resolved
- Serious non-conformances raised in audit, but not addressed after repeated requests (e.g. large storage of chemicals in non-bunded containment)
- Repeated non-conformance of significant operational procedure (e.g. building standards repeatedly ignored)

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