

# Annual Environmental Management System Report (2021/22)

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## 1. Introduction:

Oxford Brookes University (OBU) is accredited to the internationally recognised Environmental Management System (EMS) standard ISO14001. Scope includes our Oxford-based campuses and Brookes managed halls of residence. This standard provides us with a framework to protect the environment and respond to changing environmental conditions in balance with socio-economic needs.

The intended outcomes of an EMS include protecting and enhancing our environmental performance, fulfilment of compliance obligations, achieving financial/operational benefits and communicating performance to build long-term success. Ownership of the EMS sits with the Environmental Sustainability Team (EST) within Estates and Campus Services. It is a requirement of the standard that senior management shall review our EMS at planned intervals (annually) to ensure its suitability, adequacy and effectiveness. This report provides an annual management review, considering all the aspects outlined in the ISO14001 standard requirements, it will be made externally available via our sustainability website.

## 2. Key Issues:

### 2.1 External Audit / Review reporting:

#### **Action status from previous management reviews.**

No actions were proposed from the previous formal VCG management review held on 08/11/21.

#### **Action status from the external ISO14001 audit (2021)**

We are on a 3-year recertification cycle (due in 2023), with annual surveillance audits, our external auditors are NQA Certification Ltd.

An external audit was completed in September 2021. The main findings of this audit scored OBU as an overall 'satisfactory' with continued certification recommended. No major or minor non-conformances were raised for the third year running. There were only three 'opportunities for improvement' raised, all the previous years' audit findings have been closed out.

Opportunities for Improvement were raised in the following areas:

1. *OBU may find it beneficial to be more specific with SMART objectives and perhaps improve their penetration down the line of middle managers, technicians, and personnel* - This is

being addressed moving forwards with sustainability ‘dashboards’ any new/updated strategies and the new compliance officer will address penetration moving forward.

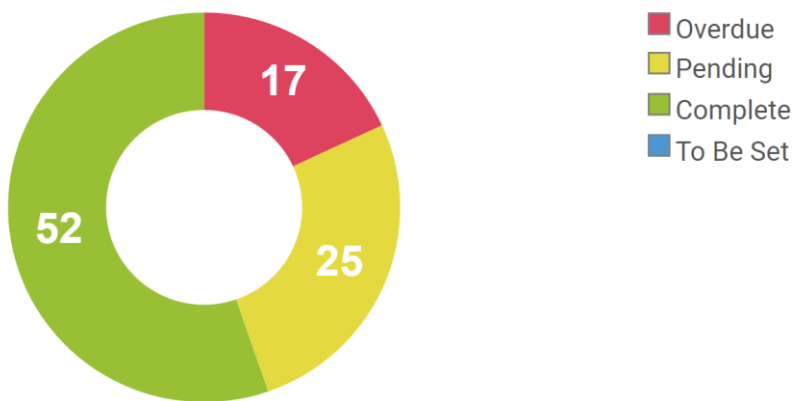
2. *It may be beneficial to manage compliance with the F-Gas Policy by ensuring all vendors, suppliers, and contractors are made aware of this new Policy* - This has been progressed through procurement.

3. *OBU may find it beneficial to report more effectively all source complaints and better scrutinise justifiable complaints* - New measures are now in place, a new online complaints form has been established. The internal processes have been reviewed to ensure ‘complaints’ are processed more efficiently, all complaints are explored and reported.

**Annual internal non-conformities/observations analysis**

The Environmental Sustainability Team completes annual EMS internal reviews across campuses, and our Brookes-managed halls of residence, this normally commences at the start of the calendar year. The new Environmental Compliance Officer was recruited in April 2022, therefore the audit programme commenced in May 2022. All internal audits will be completed by the end of this academic year.

In the last academic year, 9 minor non-conformities were identified, five of which are overdue, three of which are pending, but in progress, and one has been completed. We have had 41 observations / recommendations, of which 12 have been completed, there are 12 overdue actions and all remaining actions are pending and will be actively progressed in semester one. This is an overall increase in pending and overdue actions, which can be attributed to onsite audits recommencing and current workloads post-pandemic. The new Environmental Compliance Officer will be actively progressing these actions in semester one. The remaining pending/completed actions recorded relate to renewal reminders for current environmental permits, licences and consents, the Legislation Update Service system emails ‘owners’ a reminder in advance of any expiry date to ensure against non-renewal. Moving forward an annual dashboard will be completed, to provide an annual comparison and trend analysis.



**2.2 Legal Compliance:**

A full legal review was carried out in August this year in line with our requirements and our new on-line Legislation Update Service (LUS). The following table outlines our current status:

Legislation	Status	Notes
Pollution	FC	Ongoing compliance through pollution prevention, internal auditing, emergency response procedures & training (BCPs require updating). There was one pollution incident to surface

Legislation	Status	Notes
		water created by a 3rd party contractor, this was fully investigated and has been closed out.
Air	FC	Ongoing compliance, new F-Gas policy in place.
Water	FC	Ongoing compliance with pollution control and Water Industry Act. Clive Booth leak resolved. Surface water pollution incident attributed to a third party contractor reported, incident resolved and closed with the Environment Agency.
Waste	FC	Ongoing compliance.
Energy	FC	Ongoing Compliance, Energy Performance of Buildings Directive Annual update of DEC certificates complete.
Hazards	NFC	COSHH assessments require updates within some directorates.
Planning & Wildlife	FC	Ongoing compliance. One incident of hedge trimming during the nesting season was reported, staff were informed and training provided.
Nuisance	FC	Nuisance complaints are recorded separately within Faculties & Directorates.

FC = Fully Compliant; NFC = Not Fully Compliant (but in progress); NC = Not compliant (potential risk)

## Legislation Changes and ‘on the horizon’ changes

A core pledge of the UK Government's [25 Year Environment Plan](#) (2018) is to protect our natural world and leave it in a healthier state for the next generation. The [Environment Act](#), which became law in 2021, acts as the UK's new framework of environmental protection. Once the UK left the EU, rules on nature protection, water quality, clean air and other environmental protections that originally came from Brussels were at risk, this Act is intended to fill the gap. Through the Act, the UK Government intends to clean up the country's air, restore natural habitats, increase biodiversity, reduce waste and make better use of our resources. An overview of our legislative frameworks has been outlined below:

**Biodiversity** - The 2021 Environment Act requires a new, historic, legally binding target to halt the UK decline in species abundance by 2030. Planning regulation requirements in areas such as ‘biodiversity net gain’ have already been legislated, an overview of legislative changes can be found in the [Biodiversity Action Plan](#) annual report.

**Waste** - The Act covers four main sections for waste management; waste and resource efficiency, producer responsibility, resource efficiency, managing waste and waste enforcement and regulation. An overview of legislative changes can be found in the [Waste Action Plan](#) annual report.

**Water** - The Act brings together measures to strengthen and update the existing regulatory and long-term planning framework for water, helping to reduce environmental risks. The measures in

the Bill address eight stewardship elements for water; an overview of legislative changes can be found in the [Water Action Plan](#) annual report.

**Energy/Carbon** - There have been no significant changes in energy & carbon related legislation other than the introduction of revised Part L which deals with Energy and Carbon, and a new Approved Document Part O which deals with overheating. These documents represent revised minimum standards, which we will be compliant with as a matter of course during capital project works and also due to the more strenuous specifications we must deliver as a part of the Oxford Local Plan for 2036.

**Air quality** - The Environment Act aims to deliver cleaner air for all by setting targets on air quality, including for fine particulate matter, the most damaging pollutant to human health. Councils and other relevant public bodies will be required to work together more closely to tackle local air quality issues. The government will also be required to regularly update its National Air Quality Strategy.

These changes will be driven by new legally binding environmental targets, and enforced by a new, independent Office for Environmental Protection (OEP) which will hold government and public bodies to account on their environmental obligations.

### **3. Environmental policy, objective & target reporting.**

Continual improvement is embedded throughout our environmental policy, strategies and action plans. Our performance for the last financial year has been analysed, assessed and evaluated. Recommendations and performance reporting against our objectives and targets are as follows:

#### **Environmental Policy:**

No changes required at this stage, however, this will require an update to reflect the new policies/strategies around biodiversity, Engagement, Ethical Finance, Education and Research (due spring 2023)

#### **Environmental Strategies:**

Outlining our key vision, drivers and objectives for our significant environmental aspects.

Water, Waste and Sustainable Procurement strategies – require no specific changes at this stage.

Energy & Carbon Reduction Strategy - interim strategy signed off by VCG 25/10/21.

Travel Strategy - currently under review (due April 23)

Biodiversity Strategy - in draft (VCG approval required via separate paper)

New Sustainable Engagement Strategy - in draft (VCG approval required via a separate paper)

Our environmental policy and strategies require annual sign off by the Vice-Chancellor.

#### **Action Plans:**

Each strategy is underpinned with specific targets, our performance has been measured and evaluated against agreed timeframes, with assigned ownership.

Annex 1, overviews OBU's performance against the 2021/22 agreed 'high level' targets. The table also outlines our achievements/progress and the proposed targets for the next financial year. Targets marked in red have not been achieved, in yellow are partially achieved and green are achieved. Each target has a brief explanation underneath to clarify achievement status. Detailed aspect-specific action plans for energy, water, waste, biodiversity, travel and sustainable food outline our strategy, the national framework and the specific deliverables/actions within each target. These are reviewed and updated annually to report performance and make recommendations for continual improvement. These are available on request and will be made publicly available after sign-off with Estates and Campus Services through the Sustainability website.

#### **Operational Control Procedures:**

Have all been reviewed, updated where required and integrated into any existing internal systems.

#### **4. Needs & Expectations of Interested Parties:**

Societal expectations around the sustainability agenda have evolved over the last few years, there has been a dramatic shift in sustainability expectations, culminating from a greater understanding of the global climate and biodiversity crisis. The higher education sector is considered to be in a prime position to educate and upskill our student body and undertake the research and development required to meet this crisis. It is important that we recognise our wider impacts, embed positive sustainable change and empower our students to make positive changes for the next stage of their journey. A full review of our external/internal issues and the needs and expectations of interested parties was completed in the summer of 2022 and is reviewed on an ongoing basis.

#### **5. Risks and Opportunities:**

A full review of our environmental aspects (an element of an organisation's activities that interact with the environment) and the risks/opportunities associated with these specific aspects was completed with relevant stakeholders in the summer of 2022. These have been agreed and recorded in our Aspect Register. New aspects have been included, priority areas remain as our redevelopment programme (including the Oxford Campus Vision), energy and water use, waste production, biodiversity, transport, procurement, catering, sustainability engagement, education and learning.

The majority of these 'risks and opportunities' are being actively managed and progressed through our strategies and action plans, the following 'high level' risks require proactive management over the coming academic year.

**Sustainability Steering Group** - With the loss of Anne-Marie Kilday, Pro Vice-Chancellor Student Experience and University Community, this steering group requires a new VCG 'Sustainability Champion' and chair.

**Energy & Carbon Reduction Strategy** - The new Geoexchange heating system has reached practical completion, onboarding and optimisation will take place over the coming months. Key deliverables moving forward will include the delivery of a new Heat Decarbonisation Plan,

continued application for any decarbonisation funds, and the exploration of Power Purchase Agreements. Our wider Scope 3 assessment and the delivery of a long term strategy and roadmap to net zero, will be progressed when the DFE and the EAUC complete their analysis paper to ensure alignment with the HE sector. Resources are in place to progress these workstreams.

**Utility financial costs** – the University has [management policies and procedures](#) in place for the trading of both gas and electricity. Based upon these, our utility brokers deliver value and financial security by purchasing, in advance, c90% of the utilities we require (yielding approx £1 million in savings 21/22). However the amount of gas we can purchase is determined by the national grid, so a 90% hedged position (based on national grid volume) actually equates to a 71% hedge in reality. The remaining gas use must be purchased on the day of supply and is therefore exposed to financial volatility. This risk is potentially c£875k above the current gas budget for FY 22/23 once we account for the Government's [6-month long Energy Bills Support Package](#) as recently announced. Because we are in a comparatively good hedged position, in contrast to organisations having to purchase in the market today, the Energy Bills Support Package will not provide us with any financial cushioning on the c£875k risk as identified, it's just that the Energy Bills support package will limit our absolute exposure to this amount.

Because we are unable to hedge for our full demand a [gas demand reduction plan](#) has been developed. This aims to reduce gas use by some 15% over the heating season. Four [space heating measures](#) were approved by ECS SLT on 15th Sept for progression, they will not fully negate the financial impact. Over the coming months there will be a need to deliver further interventions, and also optimise operational performance via the recruitment of a new Assistant Energy Manager (who will focus on building performance).

There are significant challenges ahead and the outturn for FY22/23 is now likely to be at least c£2.6m for electricity and c£1.4m for gas. Existing budgets are £2,354k electric and £951k gas, so a predicted increase of c£250k electric, and c£450k (central) to c£875k (high) on gas. A concerted effort is required to put into place the resources and demand management programmes to mitigate these financial risks as utility prices are forecast to remain high for at least the next 2 years and we do not have significant financial protection after March 2023. Current projected budget for FY 23/24 is c£3.5m elec and c£2.4m gas (assuming no further support from government). We therefore have a window of opportunity to March 2023, perhaps Sept 2023 at the latest, to put into place measures to mitigate this risk. The Energy Management Advisory Group is being called to discuss approaches moving forward.

**Biodiversity** - Our current Biodiversity Strategy requires updating to address UK biodiversity decline and emerging legislative requirements focused on the protection and enhancement of biodiversity across the university estate. The annual [Action Plan](#) has been delivered, we are seeking separate approval and sign off for a new [Biodiversity Strategy](#) (VCG). Sign off of a new [Project Brief](#) and funding for the delivery of 'landscape and ecology management plans' for Headington Hill & CBSV, in support of the Oxford Campus Vision and the establishment of a new 'Biodiversity Advisory Group' under the following proposed [Terms of Reference](#) have been approved by the ECS Senior Leadership Team.

**Sustainability Engagement:** this has been risk assessed and highlighted as an area in need of improvement for both staff and students. The Green Impact Programme was delivered in the last academic year with 9 staff teams taking part and five receiving 'bronze' award status. Students

are calling for a more coordinated approach to sustainability, better communication and proactive ways to engage and enhance their experience. In the spring of 2022, VCG requested the delivery of a business case proposal and a new sustainability engagement strategy and action plan. We are seeking a separate approval for a new [sustainability engagement strategy and action plan](#).

**Education for Sustainable Development (ESD)** - HE institutions are considered to have a responsibility to educate and upskill students to face the challenges of their generation. The latest NUS survey reported 91% of students want to see Education for Sustainable Development within their institution. VCG requested a business case exploring an ESD strategy in the spring of 2022, a new ESD Working Group was established by Anne-Marie Kilday in the spring of 2022, this remit now falls under Roger Dalrymple, the interim PVC for Education.

**Sustainable Research** - The Sustainable and Resilient Futures RIKE Network and Steering Group is well established. The new strategy has been agreed and the terms of reference signed off. The sustainability website has been updated to reflect these advancements.

**Sustainable Transport Strategy & Action Plan** – The University is currently addressing changing legislation, regional policy and societal expectations around the wider impacts on climate change and local air quality. It is essential we clearly define our medium/long term objectives and targets to meet these changes. An internal Travel Advisory Group has been established to aid this process. The draft strategy and action plan is due in April 2023.

**Sustainable Food** – Expectations around the ‘sustainable food’ agenda (such as single use plastics, disposable cups, sustainable palm oil and plant-based diets) have now made this aspect a ‘high priority’. It’s been a challenging few years for the hospitality sector and our catering supplier has failed to meet some of their commitments within the [‘Sustainable Food Action Plan’](#) which needs to be actively managed.

**Social Responsibility Strategy** - Social Responsibility and the delivery of the Sustainable Development Goals is a key requirement of the sustainability league tables and our investors Environmental Social Governance (ESG) requirements. There is currently no formal strategy or action plan in place at the University. VCG requested a business case for a new Social Responsibility Strategy, this has not been progressed to date and falls under the MRE Directorate, a new VCG owner should be assigned.

**Waste Management** – Our waste recycling figures demonstrated a significant decrease in recycling and a downward trend in recycling figures against our targets during the pandemic. The campus recycling rates stayed fairly consistent, residences showed a marked decrease from an upward trend at 47% (2019/20) to 32% (2020/21), we have increased to 35%, but this requires further active management.

**Redevelopment Programme & ‘Oxford Campus Vision’** - This is being delivered through our internal ECS ‘Sustainable Design Criteria’ document, the Method Grid project management tool and inclusion of the environmental sustainability team at key RIBA stages, ensuring sustainable outcomes are delivered in line with the Oxford Local Plan.

**Ethical Finance Policy** - A new externally facing ‘Ethical Investment Policy’ has been signed off and placed externally on the Sustainability website.

**Water management** - University wide water use has significantly reduced since the beginning of this calendar year, this can mainly be attributed to the redevelopment work at the Clive Booth Student Village and the resolution of a long term water leak on this site. This is still being actively managed to avoid recurrence and the promotion of water conservation management.

## **6. Adequacy of Resources:**

The current Environmental Sustainability team consists of four team members - the Head of environmental sustainability, a decarbonisation strategic lead, a sustainable transport and strategy lead and an environmental compliance officer. This is an exceptionally small sustainability team compared to the sector, our peers have an average head count of 8 persons, the People and Planet League tables a portion scores according to FTE students and staff, to improve our scores in this criteria we would need to have a headcount of 12 persons and a Sustainability champion at VCG level.

The new draft sustainability engagement strategy as outlined above will require resourcing to deliver. The proposal outlines the need for a new engagement officer role (£41kpa) and the allocation of the Green Impact Programme delivery resource (£10kpa). This will be subject to a separate report to VCG.

We are currently progressing the recruitment of a new assistant energy manager, recruitment has been difficult due to high demand in the sector, so we are now actively engaged in appointing a recruitment consultant. Currently Oxford Brookes only employs one FTE to manage both strategic and operational energy management issues, this needs to be re-evaluated in line with the current energy crisis.

## **7. Internal & External Communications:**

The 'sustainability' website was launched in 2018, it contains our Environmental Policy and outlines our objectives in delivering sustainable energy and carbon, buildings, waste, water, travel, food, procurement and environmental management. New icons and content pages have been added to the website this year, these include Research, Ethical Finance, Student and Staff Engagement. It would be beneficial to add a new icon of Education for Sustainable Development, once this workstream is being delivered.

The website hosts our annual sustainability report, an accessible short video on our performance, the annual EMS reports, strategies, action plans and operational control procedures. An annual sustainability report was not completed for this academic year, a new report for the last 2 academic years will be delivered by December 2022. Various internal and external communications around the sustainability agenda have been delivered through Staff News and the Student Union and we received some positive external press coverage around the delivery of our new Geothermal Heat Exchange project. Sustainability updates are also delivered through our sustainability@brookes twitter feeds and the environmental forum.

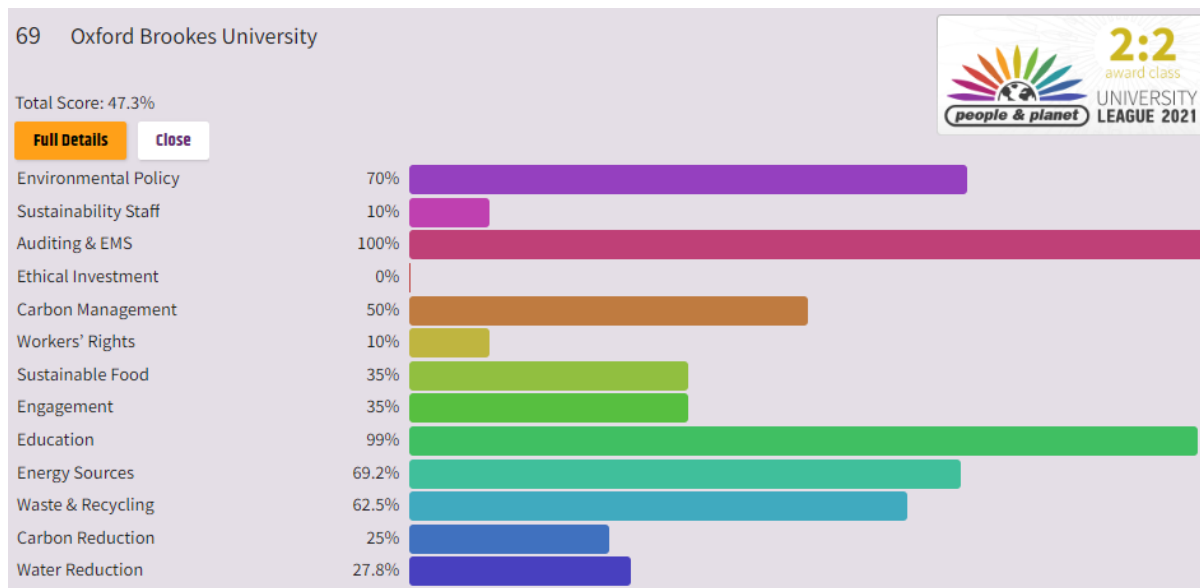
### **Table 1: Complaints and communications**



Communication	No	Overview:
FOI Requests	5	The other 5 requests related vehicle fleet, renewable energy, parking policy, energy suppliers and how to contact the Sustainability Team.
BROOKESbus	8	We are now only reporting justifiable complaints (2020/21 = 17).
Community Complaints	375	A full report on these complaints, the complaints process and an analysis of the data has been provided by Andrea Siret from the Community Engagement Team in her annual <a href="#">Community Engagement Report</a> (May 2022). This data set shows a decrease in the total number of complaints on 2021 at 536 and the numbers are slightly higher than pre-pandemic levels; where in 2020 and 2019 a total of 309 and 308 respectively. The majority of concerns raised are regarding excessive noise disturbance (230 of 375).

## 8. University Sustainability League Tables:

The People and Planet League (P&P) normally launch their University Sustainability League table annually, this league table ranks universities on their environmental and ethical performance. No reporting occurred in 2020 due to the pandemic. In 2021 we remained a 2:2 University and moved from 74th place to 69th place. An overview of our 2021 performance is outlined below:



A detailed breakdown can be accessed directly from the P&P [website](#). The 2022 League tables will be published in the autumn, we know we will have gained points for new strategies such as our ethical investment policy and the delivery of the Green Impact engagement programme. However, the criteria is evolving with the importance of the sustainability agenda and points gained are likely to be off-set by more stringent requirements such as the need for a framework for ESD and new categories of reporting such as careers and recruitment are not being actively progressed at present.

We reported under AUDE's Sustainability Leadership Scorecard (SLS) under sustainable operations, but remain to receive 'no score' as we are only reporting under 'sustainable operations.' The Sustainability Steering Group has recommended OBU align with SLS to start reporting under the wider sustainability reporting format, this requires progression for this academic year.

## 9. Conclusions:

We are delivering the majority of our accredited EMS across the 'sustainable operations' arm of the University and we can demonstrate continual improvement and reporting for the majority of our key aspects. We received no external audit non-conformances last year that require closing out and have progressed (where considered appropriate) the recommended opportunities for improvements from the last report. Our internal audit programme is considered to be suitable for our organisation, with non-conformances and recommendations recorded, reported and actively progressed within agreed timeframes, this is now being actively progressed by the new compliance officer, but is likely to result in an upturn of non-conformances for the first year post-pandemic. Our emergency response procedures and the completion of the new Business Continuity Plans require updating, these were placed on hold during the pandemic, but are now being actively progressed.

Legal compliance is effectively managed through our on-line Legislation Update Service, there are only minor areas of non-compliance (primarily COSHH) which are being actively progressed. Non-conformance around the F-gas and water regulations have now been addressed and we are fully compliant. The University's approach to environmental sustainability from a compliance perspective, would be considered appropriate to the size of our organisation. The Government's 25 year Environment Plan, and the new Environment Act legislative framework in combination with the UK's 2050 net zero target, will, however, require active management and resourcing moving forward.

Moving beyond compliance, as the urgency of the climate and biodiversity crisis gathers pace, the needs and expectations of our students, staff and key stakeholders are evolving, with the latest research from the NUS showing that students want their institutions to be doing more around the sustainability agenda. If the University wishes to keep in line with our peers within the sector, the following highlighted risks and opportunities should be addressed:

- **Leadership** - a 'Sustainability Champion' at VCG level and a new chair for the Sustainability Steering Group needs to be appointed after the loss of Anne-Marie Kilday.
- **Energy & Carbon** - The new decarbonisation strategy and the energy crisis will have a far reaching effect on our working practices moving forward. We are currently addressing resourcing levels created by recruitment difficulties to mitigate financial risk.
- **Biodiversity** - Approval for a new [Biodiversity Strategy](#) will be taken to VCG in a separate paper. Sign off of a underlying [Project Brief](#) for the delivery of 'landscape and ecology management plans' in support of the new strategy and the establishment of a new '[Biodiversity Advisory Group](#)' has been approved by the ECS senior leadership team.

- **Sustainability Engagement:** Approval for a new [sustainability engagement strategy and action plan](#) to enhance the student and staff experience will be addressed in a separate paper to VCG.
- **Education for Sustainable Development (ESD)** - Progression of an ESD framework and strategy, now that interim PVC Roger Dalrymple is in post, interfacing with the IDEAS model and the EST.
- **Social Responsibility Strategy** - There is currently no formal strategy or action plan in place at the University. We would recommend a new VCG owner is assigned.

The Sustainable Transport Strategy & Action Plan, the redevelopment programme and Oxford Campus Vision following workstreams are already being actively progressed and resourcing levels should be sufficient to meet these needs. However, the Sustainable Food, Waste and Water strategies and action plans, require active management to deliver our current targets and KPIs, these workstreams would also be supported by a new engagement officer role if approved.

### Author

Michele Morley - Head of Environmental Sustainability, Estates & Campus Services - 19/09/2022

Annex 1: [EMS Target Review](#)

This Annual EMS report will be reviewed annually by the Environmental Sustainability Team and signed off by the Vice Chancellor Group.

VCG sign off

Signature

Prof. Alistair Fitt  
Vice-Chancellor



Date 01/03/2023