
 City of Dallas	Document Number:	COD-EMS-PRO-013	Revision Number:	6
	Approved By:	OEQ Managing Director	Effective Date:	2/3/2020
	Description of Last Change:	Updated formatting, corrected grammatical errors, amended training requirements for auditors, and updated this procedure to meet ISO 14001:2015 requirements.		
Document Title:	EMS Internal Audits <small>ISO 14001:2015 9.1, 9.2</small>			

1. **PURPOSE:** This document describes the procedure for planning, performing, and documenting periodic internal Environmental Management System (EMS) audits of the City of Dallas (City) EMS program.
2. **SCOPE:** This procedure applies to all City employees engaged in City related work activities conducted within the EMS fence line.
3. **ENVIRONMENTAL:** Utilization of Environmental Management Systems, as appropriate for our operations, to provide a framework for systematically reviewing and reducing our environmental footprint.
4. **DEFINITIONS:**
 - 4.1 **Internal Audit** – systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the EMS audit criteria set by the City is fulfilled.
 - 4.2 **Audit Tool** – a checklist, guide, or other document developed or compiled to assist the EMS audit team in obtaining and evaluating objective evidence consistent with the scope of an audit. Audit tools are not controlled. Any audit tools used in a specific audit are part of the audit record and are maintained and archived within the audit records.
 - 4.3 **EMS Auditor** – a qualified and trained individual who is authorized to perform specific EMS audit functions under the direction of a lead EMS auditor.
 - 4.4 **ISO Headquarters (HQ):** The administrative body for the City’s Environmental Management System to oversee and maintain the effectiveness of the corporate certification.
 - 4.5 **Lead EMS Auditor** – a qualified and trained individual, who is authorized to plan, organize, and direct EMS audits of City of Dallas departments and facilities.
 - 4.6 **Audit Team** – the team of auditors assigned to a particular audit.
 - 4.7 **Finding** – a determination made as a result of a review of evidence. May include conformities, nonconformities, opportunities for improvement, observations and strengths.
 - 4.8 **Non-Conformity** – non-fulfillment of an ISO14001 requirement, compliance obligation or departmental or System Procedure or stated criteria.
 - 4.9 **Opportunity for Improvement (OFI)-** an opportunity to enhance performance where no actual nonconformity exists.
 - 4.10 **Conformity-** fulfillment of an ISO14001 requirement, compliance obligation or departmental or System Procedure or stated criteria.

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4.11 **Evidence-** policies, procedures, manuals, inspection checklists, operating logs, annual reports, and other documents and records; observations of practices, equipment, and facilities; and interviews with personnel, management, or contractors that objectively demonstrate conformance with the EMS criteria.

4.12 **Top Management:** The City Manager (or designee), Assistant City Managers, and executive staff, or combination thereof, who provide resources and coordinate, direct, or control departments falling within the EMS. Pursuant to Dallas City Charter Ch. VI, Sec. 2(14), the City Manager may designate any of the Assistant City Managers to perform any of the powers and duties imposed on the City Manager.

5. **RESPONSIBILITY & AUTHORITY:**

5.1 **Top Management** is responsible for providing direction and committing resources for preventing and resolving nonconformities

5.2 **Department Directors** are responsible for participating in and supporting the audit program and providing personnel to serve as internal EMS auditors as needed.

5.3 **Managing Director of the Office of Environmental Quality & Sustainability (EQS)** is responsible for:

5.3.1 Approving the EQS audit plan.

5.3.2 If necessary, resolving any disputed findings resulting from internal departmental audits.

5.3.3 Periodically updating top management regarding the status of the internal audit program.

5.4 **The Office of Environmental Quality & Sustainability (EQS)** is responsible for developing, administering, and maintaining the EMS audit program including:

5.4.1 Maintaining relevant documents and records.

5.4.2 Assigning and communicating roles and responsibilities to auditors.

5.4.3 Planning and directing EMS internal audits.

5.4.4 Selecting and supervising EMS internal auditors.

5.4.5 Preparing audit plans, creating audit tools, and completing audit entries in the City's ISO data management system.


5.4.6 Verifying completed corrective actions resulting from audit findings.

5.4.7 Evaluating audit trends to be included in EMS Top Management Reviews.


5.4.8 Designating the EMS Lead Auditors.

5.4.9 Providing training for EMS internal audit team members.

5.4.10 Preparing and reporting auditing findings and nonconformities to appropriate City staff and to the Managing Director of EQS.

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- 5.5 **EMS Manager** is responsible for:
 - 5.5.1 Managing the City's EMS program.
 - 5.5.2 Reporting the performance indicators selected for the audit program to City top management.
 - 5.5.3 First level resolution of any disputed findings resulting from internal audits.
- 5.6 **Senior Lead Auditor** is responsible for:
 - 5.6.1 Planning audits
 - 5.6.2 The overall performance of the audit program.
 - 5.6.3 Issuing or delegating authority to issue nonconformances as recommended by Lead Auditors.
 - 5.6.4 Day-to-day management of the audit program.
- 5.7 **EMS Lead Auditors** are responsible for the following:
 - 5.7.1 Planning audits along with Senior Lead Auditor.
 - 5.7.2 Serving as the principal contact to the audited entity during the audit phase of the EMS internal audits.
 - 5.7.3 Conducting or participating in audit opening and closing meetings.
 - 5.7.4 Guiding the audit team during the audit phase of the EMS internal audits.
 - 5.7.5 Consolidating audit findings received from the audit team.
 - 5.7.6 Determining audit findings and entering the results into the City's ISO data management system.
- 5.8 **Audit Team Members** are responsible for the following:
 - 5.8.1 Supporting the EMS lead auditor including assisting in documenting opening and closing meetings.
 - 5.8.2 Participating in audits through site investigations, document review, and interviews.
 - 5.8.3 Assisting in determination of audit findings.
- 5.9 **Environmental Management Representatives (EMRs)** are responsible for the following:
 - 5.9.1 Participating in audits conducted at their department.
 - 5.9.2 Coordinating with department managers to ensure auditor access to evidence and personnel within the audit scope.
 - 5.9.3 Reviewing EMS audit findings and determining corrective actions when required.

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5.9.4 Responding to and implementing corrective actions in accordance with COD-EMS-PRO 012 Non-Conformity and Corrective Action Procedure.

5.9.5 Tracking corrective actions and reporting implementation efforts to appropriate managers, supervisors, directors and EQS.

5.10 **Managers/Supervisors** are responsible for the following:

5.10.1 Providing appropriate resources, work space, necessary documentation, and access to personnel performing duties within the scope of the audit to support EMS audits.

5.10.2 Participating in audits within their scope of work.

5.10.3 Supervising the timely completion of corrective actions.

5.11 **Department personnel/staff** are responsible for fully cooperating with internal auditors during the auditing process.

6. **PROCEDURE:**

6.1 Determination of Audit frequency:

6.1.1 EMS and HQ internal audits are completed annually for all departments within the scope of the EMS.

6.1.2 EMS and HQ audits are conducted to review and determine if each element of the EMS is functioning as expected each year.

6.1.3 Audit frequency may be increased at the direction of the Managing Director of EQS or when specifically requested by the City Manager's Office.

6.2 Audit Program Objective

6.2.1 Audits are conducted to:

6.2.1.1 Determine whether the EMS conforms to the criteria of the ISO14001 standard and the City of Dallas EMS procedures.


6.2.1.2 Determine if the EMS has been properly implemented and maintained.

6.2.1.3 Determine if the EMS is effectively achieving planned results.

6.2.1.4 Provide information on the implementation and performance of the EMS to management.

6.3 EQS (Senior Lead Auditor, EMS Manager, Managing Director) shall ensure that internal audits, including HQ audits, are conducted at planned intervals by developing an annual audit plan.

6.3.1 The Senior Lead Auditor in EQS shall coordinate every year with internal EMS auditors in other EMS departments to conduct the HQ internal audit annually prior to the external audit every year.

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6.4 Selection of Auditors:

6.4.1 To assure the objectivity and impartiality of the audit process, auditors cannot audit their own processes or process over which they have responsibility.

6.4.2 Competency to perform audits is based on appropriate education, training, or experience. EQS will utilize four grades of auditors when conducting internal EMS audits: Auditor-in-Training, Auditor, Lead Auditor, and Senior Lead Auditor. The auditor grades and their associated qualification requirements are listed in Table 1.

Table 1: Grades and Qualifications for Internal EMS auditors

Grade	Minimum Class Spec	Required Environmental Work Experience	Required Audit Experience	Required Certifications	Required Audit Training
Auditor-in-Training	Environmental Coordinator-H or hold equivalent qualifications	One year	none		none
Auditor	Environmental Coordinator-H or hold equivalent qualifications	One year	20 audit days as part of an audit team. The twenty audit days must include at least 4 complete audits.		Must complete a 5-day Exemplar Global-certified EMS Lead Auditor class within 6 months of assignment
Lead Auditor	Environmental Coordinator II-I or hold equivalent qualifications	Two years	Must have completed 35 audit days, with at least 7 complete audits, as part of an audit team. Must have completed at least 15 days and 3 complete audits leading the audit team or as a solo auditor.	Must be a Certified Environmental Scientist (CES), Registered Environmental Manager (REM), or hold equivalent credentials. Must hold Exemplar Global certification grade "Environmental Auditor "or higher.	Must have completed a 5-day Exemplar Global-certified EMS Lead Auditor class
Senior Lead Auditor	Must be an Environmental Coordinator III-K or hold equivalent qualifications	Four years	Must have completed 35 audit days, with at least 7 complete audits, as part of an audit team. Must have completed at least 15 days and 3 complete audits leading the audit team or as	Must be a Registered Environmental Manager (REM) or hold equivalent credentials. Must hold Exemplar Global certification grade "Principal Environmental Auditor "or higher	Must have completed a 5-day Exemplar Global-certified EMS Lead Auditor class

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Grade	Minimum Class Spec	Required Environmental Work Experience	Required Audit Experience	Required Certifications	Required Audit Training
			a solo auditor.		

6.5 Conduct of Audits

6.5.1 To assure the objectivity and impartiality of the audit process:

6.5.1.1 Nonconformities must be based on evidence. All nonconformities shall be entered into City's ISO data management system in accordance with COD-EMS-PRO 012 Non-Conformity and Corrective Action Procedure before the audit is closed.

6.5.1.2 Records of the audit shall indicate evidence of conformity with the audit criteria.

6.5.1.3 Records shall indicate what was audited, who was interviewed (by job description), and what documents and records were reviewed.

6.5.2 Audit activities may include documentation review, site tour, staff interviews, and observation of activities performed.

6.5.3 Internal EMS audits may include an opening meeting and a closing meeting.


6.5.3.1 The closing meeting shall include reporting preliminary audit results to the representatives of the audited department.

6.6 Audit plans must consider:

6.6.1 The environmental importance of the operations concerned. Consideration should be given to significant aspects, compliance obligations, and objectives and targets.

6.6.2 The results of the previous audits including nonconformities and corrective actions.

6.6.3 The size, locations, and organization of the department being audited.

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6.7 Determination of audit criteria

6.7.1 Evidence developed by the departments to demonstrate conformance with ISO14001 standard, City of Dallas EMS procedures, and the departments' compliance obligations will be reviewed.

6.7.2 **MANDATORY REVIEW OF HISTORICAL FINDINGS:** Every EMS audit will include an evaluation of the audited department's conformance with ISO 14001 element 10.2 "Nonconformity and corrective action".

6.7.3 Audit records should indicate what evidence was collected for each of the audited criteria.

6.8 Determination of Audit scope

6.8.1 The audit scope defines the boundary of the audit. The audit scope generally includes a description of the physical locations, organizational units, activities and processes, as well as the time period covered.

6.8.1.1 Tentative scope will be determined in the annual audit plan.

6.8.1.2 Audit records shall indicate the actual scope of the audit.

6.9 Determination of Audit methods

6.9.1 Audit conformance and audit findings will be determined using sampling.

6.9.1.1 Sampling should be representative of the scope of the audit.

6.9.1.2 Audit records will indicate the actual information sampled.


6.9.2 Methods of evidence collection include staff interviews, observation of activities, and documentation and record review.

6.9.3 Audit records will document the methods used including any forms or audit tools developed in support of the audit process.

6.9.4 **MANDATORY REVIEW OF HISTORICAL FINDINGS:** Every EMS audit will include a review of the audit findings from previous audits:

6.9.4.1 Particular attention must be paid to the findings issued in the EMS audit from the previous fiscal year.

6.9.4.2 Open findings from the previous audit must be audited.

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6.9.4.3 Older findings are to be sampled at the discretion of the lead auditor.

6.10 Records for internal EMS audits shall be retained in accordance with COD documents and records management procedures.

6.11 Communication of audit results to management:

6.11.1 Preliminary findings will be communicated to the EMR as part of the closing of the audit.

6.11.2 Audit findings will be communicated electronically to the EMR using the City's ISO data management system.

7. References:

- 7.1. OEQ-EMS-008 Documents and Records Management Procedure
- 7.2. OEQ-EMS-012 Non-Conformity and Corrective Action Procedure
- 7.3. OEQ-EMS-011 Monitoring and Measurement Procedure

8. RECORDS: