

# Competence management system

Requirements with guidance for use

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# Competence Management System: Requirements

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# Foreword

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## Presentational conventions

The provisions of this standard are presented in roman (i.e. upright type). Requirements are expressed in sentences in which the principal auxiliary verb is 'shall'.

Commentary, explanation and general informative text is presented in italic type, and does not constitute a requirement. The word 'should' is used to express recommendations.

## Contractual and legal considerations

This publication does not purport to include all the necessary provisions of a contract. Users are responsible for its correct application.

**Conformance to this standard cannot confer immunity from legal obligations.**

## Introduction

Many activities that can cause pollution are prohibited unless authorised by an environmental permit. When either the competent authority or a local authority issues an environmental permit, they are allowing that activity to be carried out with certain conditions. Environmental permits can cover water and air pollution, radioactive contamination, waste management and other environmental hazards. The environmental permit includes a condition that the operator shall manage and operate the activities using sufficient competent persons and resources.

The Competence Management System is a scheme that is recognised and approved by Defra and the Welsh Government as a method of demonstrating technical competence of permitted sites where that operator shall comply with the requirements of an approved competence scheme.

The overall aim of this Standard is to comply with the environmental permit and to support environmental protection and protect human health from the process. The competence of people at each level in the organization whose work affects this protection is essential. A competence management system will enable operators to demonstrate that they have the 'technical competence' required to satisfy regulatory requirements and comply with the environmental permit.

This Standard specifies requirements for a competence management system to enable an organization to develop and implement a policy and objectives which take into account legal requirements and compliance of the environmental permit. It is intended to apply to all types and sizes of organization that have an environmental permit. The success of the system depends on commitment from all levels and functions of the organization. A system of this kind enables an organization to develop a technical competence policy, establish objectives and process to achieve the policy commitments, take action as needed to maintain performance and compliance of the environmental permit.

This Standard does not include requirements specific to other management systems, such as those for quality, environment, health and safety, financial or risk management, though its elements can be aligned or integrated with those of other management systems. It is possible for an organization to adapt its existing management system(s) in order to establish a competence management system that conforms to the requirements of this Standard. It is pointed out, however, that the application of various elements of the management system might differ depending on the intended purpose and the interested parties involved.

The level of detail and complexity of the competence management system, the extent of documentation and the resources devoted to it depend on a number of factors, such as the conditions of the environmental permit, the scope of the system, the size of the organization and the nature of its activities. This may be the case in particular for small and medium-sized enterprises.

# 1 Scope

This Standard specifies the requirements of a Competence Management System that will enable an organization to demonstrate the competence required to satisfy regulatory requirements of holding an environmental permit.

This Standard is applicable to any organization that chooses to:

- a) Establish, implement, maintain and continually improve a competence management system
- b) Assure itself of its conformity with its technical competence policy and meeting the requirements of the environmental permit
- c) Demonstrate competence by conforming to this Standard for those activities required by environmental permitting regulations

All requirements of this standard are intended to be congruent with an environmental management system.\*

## 2 Terms, definitions and abbreviations

For the purposes of this Standard, the following terms, definitions and abbreviations apply.

### 2.1 Audit

Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.

NOTE 1 An audit can be an internal audit (first party) or an external audit (second party or third party), and it can be a combined audit (combining two or more disciplines).

NOTE 2 'Audit evidence' and 'audit criteria' are defined in BS EN ISO 19011:2011.

### 2.2 Competence

Ability to apply knowledge and skills to achieve intended results.

### 2.3 Competence Management System

Part of an organization's (2.17) management system (2.12) used to develop and implement its technical competence policy and manage its competence (2.2).

NOTE 1 A management system is a set of interrelated elements used to establish policy and objectives and to achieve those objectives.

NOTE 2 A management system includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources.

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\* A requirement of all Environmental Permits in England, Wales, Scotland and Northern Ireland is for licensed activities to have an environmental management system.

## 2.4 Conformity

Fulfilment of a requirement.

## 2.5 Correction

Action to eliminate a detected non-conformity.

## 2.6 Corrective Action

Action to eliminate the cause of a non-conformity and to prevent recurrence.

## 2.7 Document

Information and its supporting medium

NOTE 1 Documented information can be in any format and media and from any source.

NOTE 2 Documented information can refer to:

- the management system, including related processes
- information created in order for the organization to operate (documentation)

## 2.8 Effectiveness

Extent to which planned activities are realized and planned results achieved.

## 2.9 Environmental Permit

Permit granted by the regulator allowing the operation of a regulated facility subject to certain conditions.

NOTE 1 Wherever the term 'environmental permit' occurs, it can also mean 'waste management licence' and should be taken to refer to any equivalent document fulfilling an equivalent purpose.

NOTE 2 Companies carrying out activities that could potentially cause emissions to air, land or water may need to hold an environmental permit. The permit specifies conditions with which an operator must comply. Operators must pay an annual charge for their environmental permit.

NOTE 3 Operators are required to obtain an environmental permit for some facilities or to register exemptions for certain waste activities. These give rise to the requirement of on-going supervision by regulators. The purpose of a permit is to:

- protect the environment and human health
- deliver permitting and compliance effectively and efficiently in a way that provides increased clarity and minimises the administrative burden on both the regulator and the operators of facilities
- encourage regulators to promote best practice in the operation of regulated facilities
- continue to fully implement European legislation



## 2.10 Human Health

Human health should be considered in the context of the regime being regulated, so for this Standard it refers to impacts to human health from environmental pollution, noise, odour or other statutory nuisances.

## 2.11 Improvement

Process of enhancing the competence management system in order to achieve improvements in overall performance consistent with the organization's technical competence policy.

## 2.12 Management System

Set of interrelated or interacting elements of an organization to establish policies and objectives and processes to achieve those objectives.

NOTE 1 A management system can address a single discipline or several disciplines.

NOTE 2 The system elements include the organization's structure, roles and responsibilities, planning, operation, etc.

NOTE 3 The scope of a management system may include the whole of the organization, specific and identified functions of the organization, specific and identified sections of the organization, or one or more functions across a group of organizations.

[SOURCE: BS ISO 14001:2004]

## 2.13 Measurement

Process to determine a value.

## 2.14 Monitoring

Determining the status of a system, a process or an activity.

NOTE To determine the status there may be a need to check, supervise or critically observe.

## 2.15 Non-Conformity

Non-fulfilment of a requirement.

## 2.16 Objective

Result to be achieved:

NOTE 1 An objective can be strategic, tactical, or operational.

NOTE 2 Objectives can relate to different disciplines (such as financial, health and safety, and environmental goals) and can apply at different levels (such as strategic, organization-wide, project, product and process (2.22)).

NOTE 3 An objective can be expressed in other ways, e.g. as an intended outcome, a purpose, an operational criterion, as an IMS objective or by the use of other words with similar meaning (e.g. aim, goal, or target).

NOTE 4 In the context of an IMS, IMS objectives are set by the organization, consistent with the IMS policy, to achieve specific results.

### **2.17 Organization**

Person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives.

NOTE The concept of organization includes, but is not limited to sole-trader, company, corporation, firm, enterprise, authority, partnership, charity or institution, or part or combination thereof, whether incorporated or not, public or private.

### **2.18 Outsource (verb)**

Make an arrangement where an external organization performs part of an organization's function or process.

NOTE An external organization is outside the scope of the management system, although the outsourced function or process is within the scope.

### **2.19 Performance**

Measurable result.

### **2.20 Policy**

Intentions and direction of an organization as formally expressed by its top management.

### **2.21 Procedure**

Specified way to carry out an activity or a process.

### **2.22 Process**

Set of interrelated or interacting activities which transforms inputs into outputs.

### **2.23 Record**

Document (2.8) stating results achieved or providing evidence of activities performed.

### **2.24 Requirement**

Need or expectation that is stated, generally implied, legal or obligatory.

NOTE 1 'Generally implied' means that it is custom or common practice for the organization and interested parties that the need or expectation under consideration is implied.

NOTE 2 A specified requirement is one that is stated, for example, in documented information.

### **2.25 Risk**

Effect of uncertainty on objectives.

[SOURCE: BS ISO 31000:2009]

NOTE 1 An effect is a deviation from the expected – positive or negative.

NOTE 2 Uncertainty is the state, even partial, of deficiency of information related to, understanding or knowledge of, an event, its consequence, or likelihood.

NOTE 3 Risk is often characterised by reference to potential events (ISO Guide 73:2009, **3.5.1.3**) and consequences (ISO Guide 73:2009, **3.6.1.3**), or a combination of these.

NOTE 4 Risk is often expressed in terms of a combination of the consequences of an event (including changes in circumstances) and the associated likelihood (ISO Guide 73:2009, **3.6.1.1**) of occurrence.

NOTE 5 Objectives can have different aspects (such as financial, health and safety, and environmental goals) and can apply at different levels (such as strategic, organization-wide, project, product and process (taken from BS ISO 31000:2009, definition **2.1**, Note 2).

## **2.26 Stakeholder**

Person or organization that can affect, be affected by, or perceive themselves to be affected by a decision or activity

## **2.27 Technical Competence**

Requirement that operators holding environmental permits are competent to deal with the environmental risks associated with their activities.

NOTE All operators should be technically competent to operate their facility and be capable of demonstrating their competence on an on-going basis. They should know: how to operate the equipment; how to comply with the law and government policies, and; how to minimise risk and the impact on people and the environment. That requires knowing where sensitive sites which may be affected are located (e.g. watercourses, housing, schools, nature conservation sites, local wildlife and heritage sites) and the pathways by which the emissions could reach them.

This can be demonstrated by conformance to an approved industry scheme: the competence management system is such an approved scheme.

## **2.28 Top Management**

Person or group of people who directs and controls an organization at the highest level.

NOTE 1 Top management has the power to delegate authority and provide resources within the organization.

NOTE 2 If the scope of the management system covers only part of an organization then top management refers to those who direct and control that part of the organization.

NOTE 3 Performance can relate either to quantitative or qualitative findings.

NOTE 4 Performance can relate to the management of activities, processes, products (including services), systems or organizations.

## 3 Competence Management System Requirements

### 3.1 General requirements

The organization shall establish, document, implement, maintain and continually improve a competence management system in accordance with the provisions of this Standard and determine how it will fulfil these requirements.

The organization shall define and document the scope of its competence management system.

### 3.2 Technical Competence Policy

Top management shall define the organization's technical competence policy and ensure that, within the defined scope of its competence management system it:

- a) Is appropriate to the nature and scale of its environmental permitted activities
- b) Includes a commitment to comply with the requirements of the environmental permit, maintain competence and improve the competence management system
- c) Provides the framework for setting and reviewing competence related objectives and targets
- d) Is documented, implemented and maintained
- e) Is communicated to all persons working for or on behalf of the organization
- f) Is available to relevant parties
- g) Is reviewed periodically to ensure that it remains relevant and appropriate to the organization

The organization shall ensure a systematic approach to identifying, demonstrating and maintaining competence that ensures compliance with requirements as detailed in the environmental permit for a site(s) and/or activities.

Top management shall communicate to all levels and functions of the organization the importance of the competence management system.

## 3.3 Planning

### 3.3.1 Design and Planning

Top management shall ensure that:

- a) The organization identifies the competences required to maintain compliance with the environmental permit and achieve competence management system objectives and targets
- b) The organization defines the process for assigning competences required for each role to demonstrate compliance with the environmental permit and achieve competence objectives
- c) The organization identifies the means of providing evidence of competence
- d) The organization defines the measures against which competence can be managed

### 3.3.2 Legal and other Requirements

The organization shall establish, implement and maintain a procedure to:

- a) Identify and have access to the applicable legal requirements and other requirements to which the organization subscribes in relation to activities it operates under an environmental permit
- b) Determine how these legal and other requirements apply to its competence requirements and ensure they are taken into consideration when establishing, implementing and maintaining the competence management system
- c) Communicate the relevant legal and other requirements to persons working for, or on behalf of, the organization

### 3.3.3 Objectives, Targets and Programme(s)

The organization shall establish, implement and maintain documented competence objectives and targets, at relevant functions and levels within the organization. The objectives shall be measurable and consistent with the technical competence policy.

When establishing and reviewing its objectives and targets, an organization shall take into account the legal and other requirements to which it subscribes. It shall also consider its technological options, its financial, operational and business requirements and the views of relevant interested parties.

The organization shall establish, implement and maintain a programme(s) for achieving its objectives and targets. Programme(s) shall include

- a) Designation of responsibility for achieving objectives and targets at relevant functions and levels of the organization, and
- b) the means and time-frame by which they are to be achieved.

## 3.4 Implementation and Operation

### 3.4.1 Roles, Responsibilities, Authority and Resources

Top management shall ensure the availability of resources required to establish, implement and maintain the competence management system. Roles, responsibilities, authorities and resources shall be defined, documented and communicated in order to ensure effective competence management.

Top management shall appoint a specific management representative(s) who, irrespective of other responsibilities, shall have the defined role, responsibilities and authority to:

- a) Ensure a competence management system is established, implemented and maintained in accordance with this Standard
- b) Report to top management on the performance of the competence management system

### 3.4.2 Competence Management System Operation

The organization shall ensure that person(s) performing tasks for it or on its behalf that can impact on the requirements of the environmental permit are competent and shall retain associated records.

The organization shall identify training needs associated with its competence management system. It shall provide training or take other action to meet these needs, and shall retain associated records.

The organization shall establish, document, implement and maintain a procedure to make persons working for it or on its behalf aware of:

- a) the importance of conformity with the technical competence policy and procedures and with the requirements of the competence management system,
- b) their roles and responsibilities in achieving conformity with the requirements of the competence management system, and
- c) the potential consequences of departure from specified procedures.

The organization shall determine the actions required to achieve conformance with the requirements of this standard and compliance with the environmental permit.

### 3.4.3 Communication

With regards to its environmental permit and requirements of the competence management system, the organization shall establish, implement and maintain a procedure for:

- a) Internal communication among the various levels and functions of the organization.
- b) Receiving, documenting and responding to relevant communications from stakeholders
- c) Communicating with contractors and other visitors to the site, and
- d) Communicating with the relevant regulator on the status of its competence management system

### 3.4.4 Documentation

The competence management system documentation shall include:

- a) The technical competence policy, objectives and targets;
- b) A description of the scope of the competence management system;
- c) Documents, including records, required by this competence management system Standard, and
- d) Documents, determined by the organization to be necessary to ensure the effective planning, operation and control of competences that relate to the management of its environmental permit requirements.

### 3.4.5 Document Control

Documents required by the competence management system shall be controlled. Records are a special type of document and shall be controlled in accordance with the requirements given in 3.5.2

The organization shall establish, implement and maintain a document control procedure(s) to:

- a) Approve documents for adequacy prior to issue
- b) Review and update as necessary and re-approve documents
- c) Ensure that changes and the current revision status of documents are identified
- d) Ensure that relevant versions of applicable documents are available at point of use
- e) Ensure that documents remain legible and readily identifiable

- f) Ensure that documents of external origin determined by the organization to be necessary for the planning and operation of the competence management system are identified and their distribution controlled, and
- g) Prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose

## 3.5 Checking

### 3.5.1 Performance Monitoring and Measurement

The organization shall establish, document, implement, communicate and maintain procedure(s) to monitor the effectiveness of the competence management system on a regular basis.

The procedure(s) shall include the monitoring of performance, applicable controls and conformity with the organization's objective and targets.

The procedure(s) shall provide for:

- a) Both qualitative and quantitative measures, appropriate to the needs of the organization
- b) Monitoring of the extent to which the organization's competence management system objectives are met;
- c) Monitoring of the extent to which the requirements of the environmental permit have been met;
- d) Proactive measures of competence that monitor compliance with legal and other requirements and conformance to operational criteria;
- e) Reactive measures of performance that monitors incidents and breaches and other historical evidence of deficient competence management system performance;
- f) Recording of data and results of monitoring and measurement sufficient to facilitate subsequent corrective and preventive action analysis.

The organization shall document the performance of persons working for it or on its behalf that interact with the competence management system.

The organization shall maintain knowledge and understanding of its status of compliance with its environmental permit.

### 3.5.2 Control of records

The organization shall establish and maintain records as necessary to demonstrate conformity to the requirements of its competence management system and of the results achieved.



The organization shall establish, implement and maintain a procedure(s) for the identification, storage, protection, retrieval, retention and disposal of records.

Records shall be and remain legible, identifiable and traceable.

### 3.5.3 Internal Audit

The organization shall ensure that internal audits of the competence management system are conducted at planned intervals to:

- a) determine whether the competence management system conforms to the organization's technical competence policy and objectives
- b) determine that the competence management system is effectively implemented and maintained in line with this Standard

Audit programme(s) shall be planned, established, implemented and maintained by the organization, based on the risk associated with the organization's activities in relation to competence, and the results of previous audits.

Audit procedure(s) shall be established, implemented and maintained that address:

- a) the responsibilities, competences and requirements for planning and conducting audits, reporting results and retaining associated records, and
- b) the determination of audit criteria, scope, frequency and methods

### 3.5.4 Non-Conformity, Corrective Action and Preventive Action

The organization shall establish, implement and maintain a procedure for dealing with actual and potential non-conformity (ies) and for taking corrective and preventive action.

The procedure(s) shall define requirements for:

- a) identifying and correcting non-conformity(ies) and taking action(s) to mitigate their impacts
- b) investigating non-conformity(ies), determining the cause(s) and underlying competence deficiencies and other factors and taking action to avoid recurrence
- c) identifying the need for corrective actions
- d) identifying opportunities for preventive action
- e) recording and communicating the results of corrective action(s) and preventive action(s) taken
- f) determining underlying competence deficiencies and other factors that might be causing or contributing to the occurrence of non-conformity(ies), and
- g) reviewing the effectiveness of corrective action(s) and preventive action(s) taken

### 3.5.5 Management Review

Top management shall review the organization's competence management system at planned intervals to ensure its continuing suitability, adequacy and effectiveness in meeting the requirements to maintain competence.

Reviews shall include assessing opportunities for system improvement and the need for changes to the competence management system, including the technical competence policy and objectives and targets. Records of these management reviews shall be retained.

Inputs to management reviews shall include:

- a) the results of internal audits
- b) communication from stakeholders
- c) the performance of the organization with regards to compliance with its environmental permit
- d) the extent to which objectives and targets have been met
- e) the status of corrective and preventive actions including those resulting from non-conformity(ies)
- f) follow-up actions from previous management reviews
- g) changing circumstances, that could impact on the competence requirements
- h) recommendations for improvement

The output from management reviews shall include any decisions and actions related to changes to the technical competence policy, objectives, targets and any other elements of the competence management system.

**Annex A**  
**(Informative)**  
**Guidance on the use of this Standard**

**A.1 General Requirements**

The additional text given in this annex is strictly informative and is intended to prevent misinterpretation of the requirements contained in Clause 3 of this Standard. While this information addresses and is consistent with the requirements of Clause 3, it is not intended to add to, subtract from, or in any way modify these requirements.

The implementation of a competence management system specified by this Standard is intended to result in the demonstration of technical competence and compliance with the environmental permit. It is a condition of an environmental permit that the operator shall manage and operate the activities using sufficient technical competent persons and resources. This Standard is based on the premise that the organization will periodically review and evaluate its competence management system to identify opportunities for improvement and their implementation. The rate, extent and timescale of this continual improvement process are determined by the organizations compliance with the environmental permit.

This Standard requires an organization to:

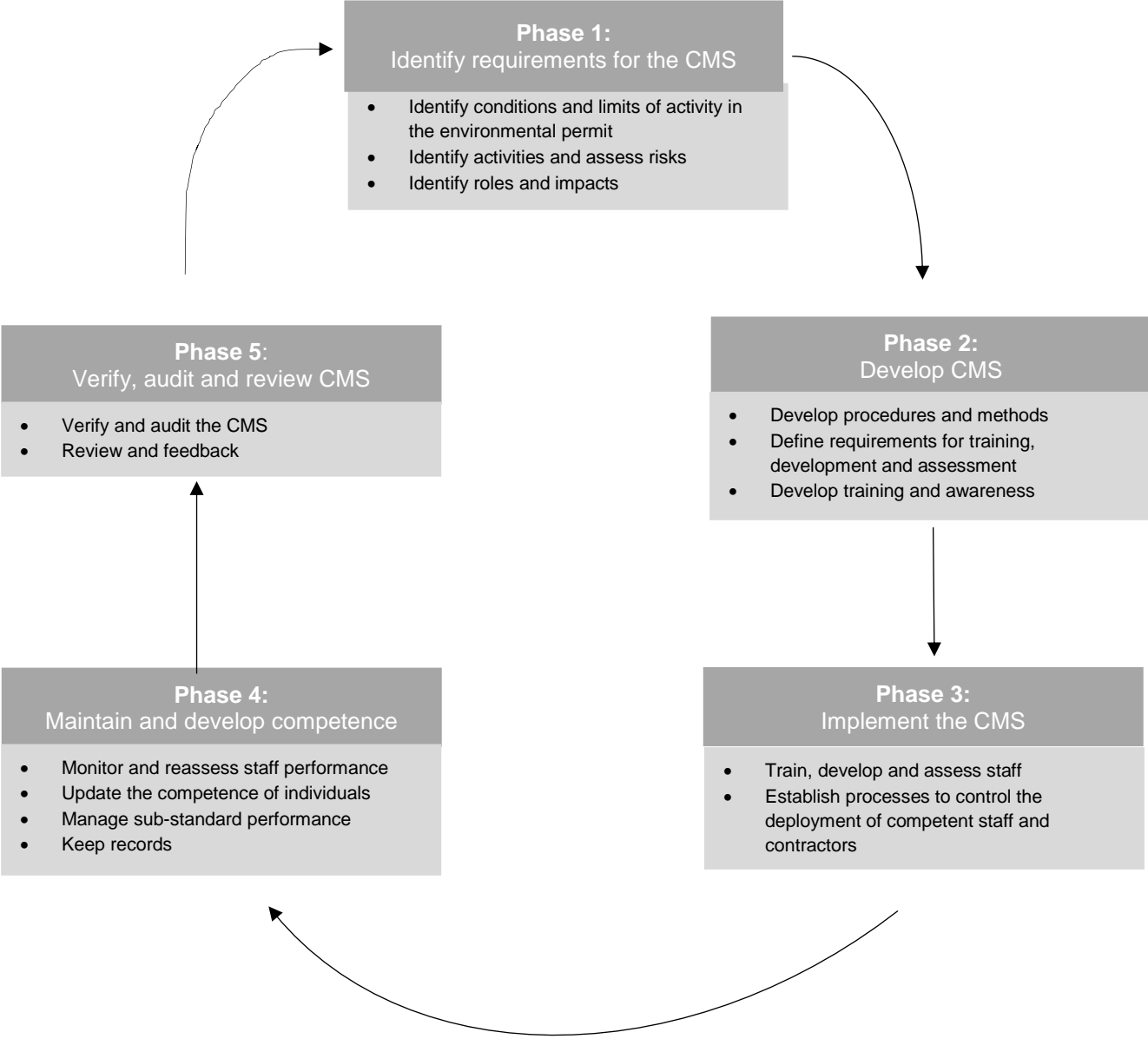
- a) establish an appropriate technical competence policy
- b) identify the conditions and limits of activities of the environmental permit and how they interact with the existing operation
- c) identify the competences required to ensure compliance with the environmental permit
- d) identify applicable legal and other requirements to which the organization subscribes
- e) identify priorities and set appropriate competence objectives and targets
- f) facilitate the design and planning, control, monitoring, preventative and corrective actions, auditing and review activities to ensure that both the policy is complied with and the competence management system remains appropriate

An organization without an existing competence management system should, initially, establish its conditions and limits of activities established in the environmental permit by means of a review. The aim of this review should be to consider all the requirements of the environmental permit and the operation performed, including those associated with normal operating conditions, abnormal conditions including start-up and shut-down, and emergency situations and accidents, as a basis for establishing the competence management system.

An organization has the flexibility to define the scope and environmental permit to which this Standard applies and may choose to implement it with respect to the entire organization or to specific sites and/or activities of the organization as long as the entire environmental permit is incorporated.

This Standard, like most management systems involves a continual process of identifying, developing, implementing, maintaining and verifying. The competence management system can be viewed as a cycle defined by 14 principles (bullet points) linked in five phases, as shown in figure 1. A principle is defined as a key step to be taken as part of a competence management system.

**Figure 1**



## **A.2 Technical Competence Policy**

The technical competence policy is the driver for implementing an organization's competence management system so that it can comply with the requirements of the environmental permit, maintain competence and improve the competence management system. This policy should therefore reflect the commitment of top management to comply with the environmental permit and with applicable legal requirements and other requirements. The technical competence policy forms the basis upon which the organization sets its objectives and targets. The technical competence policy should be sufficiently clear to be able to be understood by internal and external interested parties, and should be periodically reviewed and revised to reflect changing conditions and information. The scope of the policy should be clearly identifiable and appropriate to the nature and scale of the activities covered by the environmental permit.

The technical competence policy should be communicated to all persons who work for, or on behalf of, the organization, including contractors working at an organization's site. Communication can be in alternative forms to the policy statement itself, such as rules, directives, and procedures, and may therefore only include pertinent sections of the policy.

## **A.3 Planning**

### **A.3.1 Design and Planning**

Clause 3.3.1 is intended to provide a process for an organization to identify conditions and limits of activities in the environmental permit and to develop a competence management system so that appropriate competence is identified, developed, implemented and maintained at all times. This process should consider normal and abnormal operating conditions, shut-down and start-up conditions (where appropriate), as well as reasonably foreseeable emergency situations.

### **A.3.2 Legal and other Requirements**

The organization needs to identify the legal requirements that are applicable to the compliance of its environmental permit. These may include:

- national and international legal requirements
- local government legal departments
- departmental legal requirements

Examples of other requirements to which the organization may subscribe include, if applicable:

- regulatory guidance
- agreement with public authorities
- agreements with customers
- non-regulatory guidelines
- requirements of trade associations
- voluntary principles or codes of practice
- corporate/company requirements

The determination of how legal and other requirements apply to an organization's compliance of the environmental permit is usually accomplished in the process of identifying these requirements. It may

not be necessary, therefore, to have a separate or additional procedure in order to make this determination.

### **A.3.3 Objectives and Targets**

The objectives and targets should be specific, measurable wherever practicable and consistent with the technical competence policy. They should include a commitment to ensuring continuing competence and compliance to the environmental permit.

When considering its technological options, an organization should consider the use of best available techniques where economically viable, cost-effective and judged appropriate. The organization's objectives and targets should include timescales, necessary resources and personnel responsible for implementation.

## **A.4 Implementation and Operation**

### **A.4.1 Roles, Responsibilities, Authority and Resources**

The successful implementation of a competence management system calls for commitment from all relevant persons working for the organization or on its behalf.

This commitment should begin at the highest level of management. Accordingly, top management should establish the organization's technical competence policy and ensure that the competence management system is implemented and maintained. As part of this commitment, top management should designate a specific management representative(s) with defined responsibility and authority for implementing the competence management system. In large or complex organizations, there may be more than one designated representative. In small or medium-sized businesses, these responsibilities may be undertaken by one individual. Management should also ensure that appropriate resources, such as organizational infrastructure, are provided to ensure that the environmental permit is complied with.

Top management should also ensure the availability of resources required to establish and maintain the competence management system. It is also important that the key competence management system roles and responsibilities are well defined and communicated to relevant parties working for or on behalf of the organization.

### **A.4.2 Competence Management System Operation**

The organization should identify the awareness, knowledge, understanding and skills needed by any person with the responsibility and authority to perform tasks that may have an impact on the compliance of the environmental permit.

This Standard requires that:

- a) those persons whose work could impact on the compliance of the environmental permit are competent to perform the tasks to which they are assigned,
- b) training needs are identified and actions are taken to ensure the provision of training,
- c) all persons are aware of the organization's environmental permit, competence management system and competence management policy and how these could be affected by their work,
- d) sub-standard performance is identified, addressed, communicated, managed and reassessed to ensure the compliance of the environmental permit is not compromised,
- e) associated records are maintained.

Awareness, knowledge, understanding and competence may be obtained or improved through training, education or work experience.

The organization should require that contractors working on its behalf are able to demonstrate that their employees have the requisite competence and/or appropriate training.

#### **A.4.3 Communications**

The organization should ensure that all persons who work for, or on behalf of, the organization, including contractors working at an organization's site are aware of the organization's technical competence policy and competence management system. All persons who work for, or on behalf of, the organization, including contractors working at an organization's site should also be aware of their roles and requirements in respect of the competence management system and the consequences of their activities and behaviours in achieving compliance with the requirements of the environmental permit.

There is an additional specific requirement for organization to inform the relevant regulator of the status of their competence management system in accordance with the requirements of their environmental permit.

#### **A.4.4 Documentation**

The level of detail of the documentation should be sufficient to describe the competence management system and how its parts work together, and how it ensures compliance to the environmental permit. The level of documentation may differ from one organization to another depending on the size and type of organization and the complexity of processes and activities.

Examples of documents include:

- statement of policy, objectives and targets,
- procedures,
- organizational charts,
- training programme,
- internal and external standards,
- records.

Any decision to document procedures(s) should be based on issues such as

- the consequence of not complying with the environmental permit,
- the need to ensure that the activity is undertaken consistently
- the requirements of this Standard

Documents originally created for purposes other than the competence management system may be used as part of this system and, if so used, need to be referenced in this system.

#### **A.4.5 Document Control**

The intent of 3.4.5 is to ensure that organizations create and maintain documents in a way that allows effective implementation of the competence management system, compliance with the environmental permit and management of competence, not on a complex document control system.

## **A.5 Checking**

### **A.5.1 Performance Monitoring and Measurement**

Data collected from monitoring and measurement can be analysed to identify patterns and obtain information. Knowledge gained from this information can be used to implement corrective and preventative action.

This will include developing procedures to monitor the performance of individuals, sites and the organization to determine how it is achieving its objectives and targets.

### **A.5.2 Control of records**

Examples of records include:

- training records,
- assessment records,
- complaint records,
- incident reports,
- regulator and/or enforcement body reports and/or notices,
- process monitoring records,
- maintenance and calibration records,
- audit results,
- pertinent contractor and supplier records,
- management review results,
- external communications decisions,
- records of applicable legal requirements,
- legal compliance records,
- communication with interested parties.

NOTE Records are not the sole source of evidence to demonstrate conformity to this Standard.

### **A.5.3 Internal Audit**

Internal audits of a competence management system can be performed by personnel from within the organization or by external persons selected by the organization, working on its behalf. In either case, the persons conducting the audit should be competent and in a position to do so impartially and objectively. In small organizations, auditor independence can be demonstrated by an auditor being free from responsibility for the activity being audited.

NOTE 1 Guidance on auditing of competence management systems is given in ISO 19011.

### **A.5.4 Non-Conformity, Corrective Action and Preventive Action**

Depending on the nature of the nonconformity, by establishing procedures to deal with these requirements, organizations may be able to accomplish them with a minimum of formal planning, or it



may be a more complex and long-term activity. Any documentation should be appropriate to the level of action.

#### **A.5.5 Management Review**

The management review should cover the scope of the competence management system, although not all elements of the competence management system need to be reviewed at once and the review process may take place over a period of time.

# Bibliography

## Standards publications

For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

BS ISO 14001:2004, *Environmental management systems – Requirements with guidance for use*

BS EN ISO 19011:2011, *Guidelines for auditing management systems*

BS EN ISO/IEC 17021:2011, *Conformity assessment – Requirements for bodies providing audit and certification of management systems*

BS ISO 31000:2009, *Risk management – Principles and guidelines*

ISO Guide 73:2009, *Risk management – Vocabulary*

## Other publications

GREAT BRITAIN. Environmental Protection Act 1990. London: The Stationery Office.

GREAT BRITAIN. Pollution Prevention and Control (England and Wales) Regulations 2000 (as amended). Statutory Instrument 2002 No. 1973. London: The Stationery Office.

GREAT BRITAIN. Environmental Permitting Regulations (as amended) 2007. Statutory Instrument 2002 No. 3538. London: The Stationery Office.

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