

## AUDIT COMMITTEE - TUESDAY, 11 JULY 2023

### Report of the Director of Commercial and Economic Development Lead Member: Councillor Louise Jones

#### Part A

##### ENVIRONMENTAL AUDIT (OUTCOMES)

##### Purpose of Report

The purpose of this report is to update the Committee on the outcome of environmental audits undertaken for April 2023.

##### Recommendation

That the Committee notes the outcome of the environmental audit process, including the identified actions for any mitigation required.

##### Reason

To ensure the Committee is kept informed of the Council's approach to managing environmental risks related to the in-house Environmental Management System.

##### Policy Justification and Previous Decisions

The Council has an in-house Environmental Management System to manage legal compliance with environmental regulations and environmental impact arising from its activities and operations. The Council's Corporate Strategy states 'We care deeply about the environment, and we are committed to looking after it for future generations'. The Council has adopted a Climate Change Strategy 2018-2030 and a Carbon Neutral Plan 2030 towards this aim.

The driver for implementing and improving the Council's Environmental Management System comes from the Council's Environmental Policy which can be seen at [https://www.charnwood.gov.uk/pages/environmental\\_management](https://www.charnwood.gov.uk/pages/environmental_management). The Policy was adopted by Cabinet in October 2015 and establishes a framework for setting objectives and targets for environmental improvement. In February 2021 a review of the policy was undertaken to ensure that it is reflective of both the Council's priorities and fits within the scope of the Environmental Management System. The policy was updated under a delegated decision to include an explicit commitment to protection of the environment including the prevention of pollution in relation to the context of the Council activities.

##### Implementation Timetable including Future Decisions

Reports will continue to be submitted to the Committee on an annual basis.

##### Report Implications

##### ***Financial Implications***

The costs of preparing and providing the implementation of the in-house Environmental Management System are met from within the Sustainability budget. The costs of implementing the Environmental Management System in respect of operations and activities undertaken by the Council are met from within the existing budgets of individual service areas that the Environmental Management System covers. The Council’s Sustainability Officer provides the strategic resource to manage the in-house Environmental Management System.

**Risk Management**

The risks associated with the decision Audit Committee is asked to make and proposed actions to mitigate those risks are set out in the table below.

Risk Identified	Likelihood	Impact	Overall Risk	Risk Management Actions Planned
Failure to comply with environmental legislation leads to damage to environment, reputation, and civil or criminal action being taken against the Council	Likely (3)	Significant (2)	Moderate (6)	Access to Legislation Update Service, Training, Raising Awareness, Internal audits.
The Council fails to meet broader environmental objectives outlined within its policy	Unlikely (2)	Minor (1)	Very Low (2)	Senior Leadership Team and Audit Committee in place to review annual performance.

**Equality and Diversity**

None identified.

**Climate Change and Carbon Impact**

An in-house Environmental Management System will help ensure environmental legal responsibilities are met and more easily managed on a day-to-day basis. The Environmental Management System will help manage waste and resources more effectively and reduce cost. Actions to improve energy efficiency will reduce carbon emissions and have a positive impact on climate change.

**Crime and Disorder**

None identified.

**Publicity Arrangements**

Not applicable.

**Consultations**

Not applicable.

### Links to the Corporate Strategy

Caring for the Environment	Yes
Healthy Communities	No
A Thriving Economy	No
Your Council	No

Key Decision: N

Background Papers: None

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## **Part B**

### Background

1. The Council has an in-house Environmental Management System for Council owned property at Southfield Road offices, Loughborough Town Hall, Charnwood Museum, Oak and Ark Business Centres and Woodgate Chambers. It relates to the direct operations of the Council and not to any activities sub-contracted to other operators (such as domestic and municipal waste collection). The Environmental Management System does not deal with activities related to the enforcement of environmental or planning regulations aimed at reducing impacts across the Borough, except where these relate directly to the Council's own actions and activities. The Sustainability Officer provides the resource to coordinate the in-house Environmental Management System overseen by the Senior Leadership Team (SLT). Implementation of the Environmental Management System is the direct responsibility of the service areas carrying out activities and operations that fall within its scope.

### Legal Compliance

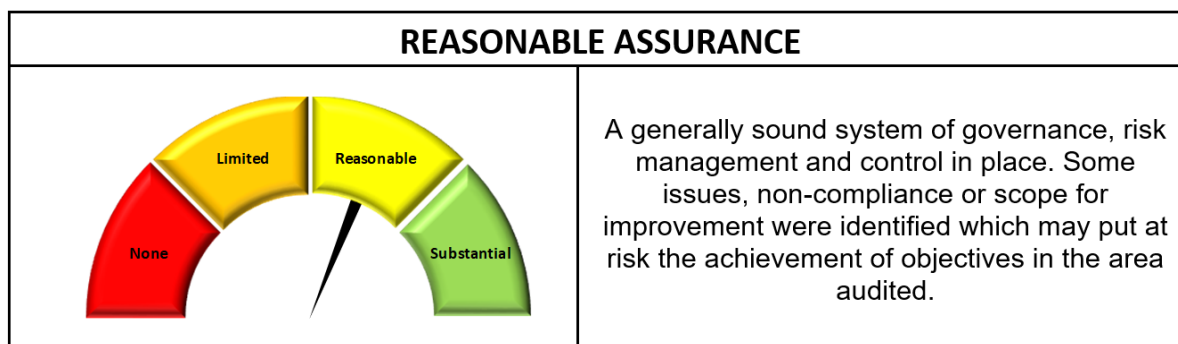
2. The Sustainability Officer has overall responsibility for keeping information on environmental aspects and their associated legislative requirements. 'Environmental aspects' are any element of the Council's activities that can interact with the environment. The current method of updating legal information about the environment is provided by the online Legislation Update Service (LUS).

### Environmental Audits

3. Environmental audits took place on 18th and 19<sup>th</sup> April to assess operational control of environmental risk, including legal compliance, and to determine whether the requirements of the Environmental Management System are being met. Health and Safety obligations have not been audited as the Council has a separate Health and Safety audit provision. Audits included the Oak and Ark Business Centres, the Museum, Town Hall, Southfield Road offices and Woodgate Chambers. The audit reports have been issued to building managers and relevant heads of service and, where non-conformities have been raised, recommendations for mitigation actions have been made. Recommendations for mitigating actions are for the service areas/responsible managers to implement at the earliest opportunity having regard to the scale of risk.
4. A presentation on the outcome of audit findings and recommendations was provided to building managers on 16th May 2023. The implementation of mitigation actions is managed through the Legislation Update Service which enables urgency of the action required, deadlines and management oversight to be coordinated.
5. A suggestion from Audit Committee at its meeting 12 July 2022 was to take advice from Internal Audit on constructing reports. The reporting of the outcomes of Environmental Audits has been changed from previous years to align more closely with Internal Audit. Findings are reported on a nonconformity basis where there is a non-fulfilment of a legal requirement. A level of assurance has been provided as to how to effective the in-house Environmental Management System is working.

## Assurance

6. From the audit findings, an overall level of assurance has been provided as to the effectiveness of the Environmental Management System in place to manage the risk associated with environmental operational control, including legal compliance at Ark Business Centre, Charnwood Museum, Oak Business Centre, Southfield Road, Loughborough Town Hall and Woodgate Chambers. The level of assurance given, as to the effectiveness of the Environmental Management System in place, is “Reasonable Assurance” (as depicted and defined below):



7. Each of the sites displayed the following areas of positive assurance during the audits:
- Maintained to a good standard being overall tidy and ordered (referenced in the audit reports as Housekeeping), with chemicals stored in locked cupboards.
  - Access to emergency spill materials.
  - Display Energy Certificates (DEC's) visible in public areas.
8. The main areas identified for improvement are:
- Completion and retention of waste documentation and records in connection with The Waste Regulations. Waste documentation was not always available to sample and in some instances had been completed incorrectly.
  - Retention of records in connection with F gases contained in air conditioning, including the units installed onsite, refrigerants within the units, leak testing and servicing requirements, certificates of competency for the engineer carrying out the work.

## Assurance Findings by Site

Please note definitions of each level of assurance can be found in Appendix A.

<b>Ark Business Centre</b>			
<b>Key Control Objective</b>	<b>Legal Obligation</b>	<b>Summary of Work</b>	<b>Level of Assurance</b>
F-Gas Refrigerant Documentation	The Fluorinated Greenhouse Gases	N/A. There is no air conditioning at Ark.	N/A

	Regulations 2015 (SI 2015/310) as amended.		
Waste Management	The Waste (England & Wales) Regulations 2011 (SI 2011/988) as amended.	Audit of waste including Duty of Care, segregation, storage, and records provided in connection with waste management.	Reasonable
	The Hazardous Waste (England and Wales) Regulations 2005 (SI 2005/894).	Audit of waste including Duty of Care, segregation, storage, and records provided in connection with waste management.	Reasonable
Energy	The Energy Performance of Buildings (England and Wales) Regulations 2012 (SI 2012/3118) as amended.	Appropriate Energy Performance Certificate publicly displayed.	Substantial

### Charnwood Museum

Key Control Objective	Legal Obligation	Summary of Work	Level of Assurance
F-Gas Refrigerant Documentation	The Fluorinated Greenhouse Gases Regulations 2015 (SI 2015/310) as amended.	Audit of records provided in connection with F-gases contained in air conditioning.	Reasonable
Waste Management	The Waste (England & Wales) Regulations 2011 (SI 2011/988) as amended.	Audit of waste including Duty of Care, segregation, storage, and records provided in connection with waste management.	Reasonable
	The Hazardous Waste (England and Wales) Regulations 2005 (SI 2005/894).	Audit of waste including Duty of Care, segregation, storage, and records provided in connection with waste management.	Reasonable
Oil Storage	N/A	N/A	N/A
Energy	The Energy Performance of Buildings (England and Wales) Regulations 2012 (SI 2012/3118) as amended.	Appropriate Energy Performance Certificate publicly displayed.	Substantial

### Oak Business Centre

Key Control Objective	Legal or Other Obligation	Summary of Work	Level of Assurance
F-Gas Refrigerant Documentation	The Fluorinated Greenhouse Gases	N/A There is no air conditioning at Oak.	N/A

	Regulations 2015 (SI 2015/310) as amended.		
Waste Management	The Waste (England & Wales) Regulations 2011 (SI 2011/988) as amended.	Audit of waste including Duty of Care, segregation, storage, and records provided in connection with waste management.	Reasonable
	The Hazardous Waste (England and Wales) Regulations 2005 (SI 2005/894).	Audit of waste including Duty of Care, segregation, storage, and records provided in connection with waste management.	Reasonable
Energy	The Energy Performance of Buildings (England and Wales) Regulations 2012 (SI 2012/3118) as amended.	Appropriate Energy Performance Certificate publicly displayed.	Substantial

### Southfield Road

Key Control Objective	Legal or Other Obligation	Summary of Work	Level of Assurance
F-Gas Refrigerant Documentation	The Fluorinated Greenhouse Gases Regulations 2015 (SI 2015/310) as amended.	Audit of records provided in connection with F-gases contained in air conditioning.	Reasonable
Waste Management	The Waste (England & Wales) Regulations 2011 (SI 2011/988) as amended.	Audit of waste including Duty of Care, segregation, storage, and records provided in connection with waste management.	Reasonable
	The Hazardous Waste (England and Wales) Regulations 2005 (SI 2005/894).	Audit of waste including Duty of Care, segregation, storage, and records provided in connection with waste management.	Reasonable
Oil storage	The Control of Pollution (Oil Storage) (England) Regulations 2001 (SI 2001/2954).	Audit of operational control and documentation in relation to oil storage including the generator.	Reasonable
Energy	The Energy Performance of Buildings (England and Wales) Regulations 2012 (SI 2012/3118) as amended.	Appropriate Energy Performance Certificate publicly displayed. Valid TM44 air conditioning inspection in place.	Substantial

### Loughborough Town Hall

Key Control Objective	Legal or Other Obligation	Summary of Work	Level of Assurance
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F-Gas Refrigerant Documentation	The Fluorinated Greenhouse Gases Regulations 2015 (SI 2015/310) as amended.	Audit of records provided in connection with F-gases contained in air conditioning.	None
Waste Management	The Waste (England & Wales) Regulations 2011 (SI 2011/988) as amended.	Audit of waste including Duty of Care, segregation, storage, and records provided in connection with waste management.	Limited
	The Hazardous Waste (England and Wales) Regulations 2005 (SI 2005/894).	Audit of waste including Duty of Care, segregation, storage, and records provided in connection with waste management.	Reasonable
Energy	The Energy Performance of Buildings (England and Wales) Regulations 2012 (SI 2012/3118) as amended.	Appropriate Energy Performance Certificate publicly displayed. Valid TM44 air conditioning inspection in place.	Substantial

<b>Woodgate Chambers</b>			
<b>Key Control Objective</b>	<b>Legal or Other Obligation</b>	<b>Summary of Work</b>	<b>Level of Assurance</b>
F-Gas Refrigerant Documentation	The Fluorinated Greenhouse Gases Regulations 2015 (SI 2015/310) as amended.	Audit of records provided in connection with F-gases contained in air conditioning.	Substantial
Waste Management	The Waste (England & Wales) Regulations 2011 (SI 2011/988) as amended.	Audit of waste including Duty of Care, segregation, storage, and records provided in connection with waste management.	Reasonable
	The Hazardous Waste (England and Wales) Regulations 2005 (SI 2005/894).	Audit of waste including Duty of Care, segregation, storage, and records provided in connection with waste management.	Reasonable
Energy	The Energy Performance of Buildings (England and Wales) Regulations 2012 (SI 2012/3118) as amended.	Appropriate Energy Performance Certificate publicly displayed. Valid TM44 air conditioning inspection in place.	Substantial

### Summary of Audit Findings

9. The audit findings were classified as follows:

<b>Type</b>	<b>Description</b>
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**Non-  
Conformance  
(NCR)**

A non-fulfilment of a legal requirement (a noncompliance), either through proof that the requirement is not being met, or lack of evidence to prove that it is being met.

This report highlights findings on an exception basis and does not include full details of controls that the audits found to be operating satisfactorily.

10. Overall, the management of the Environmental Management System has been maintained to a good standard. There have been staffing changes at the Town Hall and Museum. A number of energy efficient initiatives have been put in place, ranging from installation of LED lighting at the Town Hall and Southfield Road, to a smart boiler at the Oak. A significant fire incident occurred at the adjacent HSBC building, which spread to the Town Hall roof, and caused damage to the loft/roof area and the Victoria room.
11. In total 8 Non-Conformance with Requirements (NCRs) were found. There has been 1 Non-Conformance completed whilst 7 remain open within agreed completion timeframes. Findings have been entered onto the online Legislation Update Service (LUS) operated by the Council. Actions in relation to the findings have been allocated to the site managers with an agreed due date. The site managers will monitor progress against their allocated actions and update the LUS system. Action plans for the audited sites can be found in the tables below. An interim audit to follow-up on progress will take place in October.

## Action Plan Non-Conformance Reports (NCRs)

Action plans for the audited sites can be found in the tables below. NCRs are findings that relate to a noncompliance.

### **Ark 2023**

There were no NCRs raised.

### **Oak 2023**

<b>Legislative Requirement</b>	<b>Waste Management</b>					
<b>Risks</b>	<b>Noncompliance with: The Waste (England &amp; Wales) Regulations 2011 (SI 2011/988) as amended.</b>					
<b>Non conformance</b>	<b>Recommendation</b>	<b>Priority</b>	<b>Response/Agreed Action</b>	<b>Officer Responsible</b>	<b>Action Due</b>	<b>Implementation Date</b>
<b>2023 Oak NCR 1:</b> The Oak General Waste & Mixed Packaging, Paper & Card annual waste transfer note “season ticket”, did not display a waste carrier licence registration number for Serco.	The season ticket should display a waste carrier licence registration number for Serco.	Critical	Amend or produce a new “season ticket” to display the waste carrier licence registration number for Serco.	Eirlys Oliff Denise Sparks	16/05/23	Completed 16/05/23.  License number entered on paperwork.

### **Charnwood Museum 2023**

<b>Legislative Requirement</b>	<b>Waste Management</b>					
<b>Risks</b>	<b>Noncompliance with: The Waste (England &amp; Wales) Regulations 2011 (SI 2011/988) as amended /The Hazardous Waste (England and Wales) Regulations 2005 (SI 2005/894).</b>					
<b>Non conformance</b>	<b>Recommendation</b>	<b>Priority</b>	<b>Response/Agreed Action</b>	<b>Officer Responsible</b>	<b>Action Due</b>	<b>Implementation Date</b>
<b>2023 Museum NCR 1:</b> There was no waste transfer note or hazardous waste consignment note, for printer cartridge waste	Determine whether the printer cartridges are hazardous or non-hazardous and obtain appropriate waste documentation for the	Critical	The Museum will determine whether the printer cartridges are hazardous or non-hazardous and obtain appropriate waste	Kevin Stanley	31/10/23	

removed in the last 12 months	removal of waste printer cartridges from the site.		documentation for the removal of waste printer cartridges from the site.			
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Legislative Requirement	Waste Management					
Risks	Noncompliance with: The Waste (England & Wales) Regulations 2011 (SI 2011/988) as amended.					
Non conformance	Recommendation	Priority	Response/Agreed Action	Officer Responsible	Action Due	Implementation Date
<b>2023 Museum NCR 2:</b> The waste transfer note for recycling cardboard, paper and plastics for the period 01/05/2022 to 30/4/2023, had not been signed by Serco.	Future waste transfer notes should be signed by all parties.	Critical	Future waste transfer notes should be signed by all parties.	Kevin Stanley	31/10/23	

### Loughborough Town Hall 2023

Legislative Requirement	F-Gas Refrigerant Documentation					
Risks	Noncompliance with The Fluorinated Greenhouse Gases Regulations 2015 (SI 2015/310) as amended.					
Non conformance	Recommendation	Priority	Response/Agreed Action	Officer Responsible	Action Due	Implementation Date
<b>2023 Town Hall NCR1:</b> There was no information available to evidence of: <ul style="list-style-type: none"> <li>Leak testing of units containing F gas at the Town Hall since 2021.</li> </ul>	In line with the law and Government Guidance, the site should obtain and maintain records including: <ul style="list-style-type: none"> <li>The F gas units installed onsite.</li> <li>The refrigerants within the units.</li> <li>Leak testing and servicing requirements.</li> </ul>	Critical	Obtain and maintain records for air conditioning units.	Simon Gibson	31/10/23	

	Certificates of the competency of the engineer carrying out the work.					
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<b>Legislative Requirement</b>	<b>Waste Management</b>					
<b>Risks</b>	<b>Noncompliance with The Hazardous Waste (England and Wales) Regulations 2005 (SI 2005/894).</b>					
<b>Non conformance</b>	<b>Recommendation</b>	<b>Priority</b>	<b>Response/Agreed Action</b>	<b>Officer Responsible</b>	<b>Action Due</b>	<b>Implementation Date</b>
<b>2023 Town Hall NCR 2:</b> Hazardous Waste consignment note: TOWNHA/952CE, from PHS Ltd, dated 22/02/2023 was not signed by Charnwood in part D or signed by PHS Ltd in Part E.	Commit to ensuring all future hazardous waste consignment notes are signed appropriately and obtain/retain a part E for the PHS Ltd consignment note TOWNHA/952CE.	Critical	Commitment to sign appropriately all future hazardous waste consignment notes. Obtain/retain a part E for the PHS Ltd consignment note TOWNHA/952CE	Simon Gibson	31/10/23	

<b>Legislative Requirement</b>	<b>Waste Management</b>					
<b>Risks</b>	<b>Noncompliance with The Waste (England &amp; Wales) Regulations 2011 (SI 2011/988) as amended.</b>					
<b>Non conformance</b>	<b>Recommendation</b>	<b>Priority</b>	<b>Response/Agreed Action</b>	<b>Officer Responsible</b>	<b>Action Due</b>	<b>Implementation Date</b>
<b>2023 Town Hall NCR 3:</b> Uncontained bulky waste, including waste paint tins and a waste AdBlue container, were not stored securely in a manner compliant with the Waste Duty of Care Code of Practice.	Store waste securely in a manner compliant with the Waste Duty of Care Code of Practice.	Critical	The site will arrange for the waste to be securely contained, collected, and transferred appropriately.	Simon Gibson	31/10/23	

### Loughborough Town Hall Outstanding Previous Findings

<b>Legislative Requirement</b>	<b>Waste Management</b>
<b>Risks</b>	<b>Noncompliance with:</b>

	<ul style="list-style-type: none"> <li>• The Waste (England &amp; Wales) Regulations 2011 (SI 2011/988) as amended.</li> <li>• The Hazardous Waste (England and Wales) Regulations 2005 (SI 2005/894).</li> </ul>					
Non conformance	Recommendation	Priority	Response/Agreed Action	Officer Responsible	Action Due	Implementation Date
<b>TNCR3 (2021):</b> Previous TNCR3: There is no waste transfer note for the transfer of printer cartridges.	Establish a process, including completing the appropriate waste documentation, for waste printer cartridges to be consigned or transferred to a central point at Southfield Road, where it can then be disposed of via the established disposal route.	Critical	Establish a collection route with Southfield Road and retain a waste transfer note or hazardous waste consignment note for the collection.	Simon Gibson	31/10/23	

Legislative Requirement	Waste Management					
Risks	Noncompliance with: The Waste (England & Wales) Regulations 2011 (SI 2011/988) as amended.					
Non conformance	Recommendation	Priority	Response/Agreed Action	Officer Responsible	Action Due	Implementation Date
<b>TNCR6 (2022):</b> The following waste records were unavailable to view during the audit: <ul style="list-style-type: none"> <li>• Sanitary</li> <li>• Dry Mixed Recycling (Love Loughborough)</li> </ul>	2023 comment: This finding remains open, as no waste records were seen for Sanitary or Dry Mixed Recycling waste streams. Obtain current waste transfer notes documents for Sanitary waste and Dry Mixed Recycling.	Critical	Obtain current waste transfer notes documents for Sanitary waste and Dry Mixed Recycling.	Simon Gibson	31/10/23	

### Southfield Road 2023

Legislative Requirement	Waste Management					
Risks	Noncompliance with: The Hazardous Waste (England and Wales) Regulations 2005 (SI 2005/894).					
Non conformance	Recommendation	Priority	Response/Agreed Action	Officer Responsible	Action Due	Implementation Date

<b>2023 Southfield NCR1:</b> Hazardous waste consignment, CHARNW/11378, for the collection of Florescent Tubes and Batteries, displayed an incorrect SIC (Standard industry code) 43210. It also showed a discrepancy between the consigned and returned weights.	Future hazardous waste consignments should use SIC 84110. An investigation should be undertaken to establish whether the consigned weight was incorrect (perhaps it should have read 35kg instead of 350kg).	Critical	Future hazardous waste consignments will use SIC 84110. An investigation is to be undertaken to establish whether the consigned weight was incorrect (perhaps it should have read 35kg instead of 350kg).	Ian Cave	20/12/23	
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<b>Legislative Requirement</b>	<b>Waste Management</b>					
<b>Risks</b>	<b>Noncompliance with: The Waste (England &amp; Wales) Regulations 2011 (SI 2011/988) as amended.</b>					
<b>Non conformance</b>	<b>Recommendation</b>	<b>Priority</b>	<b>Response/Agreed Action</b>	<b>Officer Responsible</b>	<b>Action Due</b>	<b>Implementation Date</b>
<b>2023 Southfield NCR 2:</b> Waste transfer notes for waste printer cartridges collections by Lyreco were not available to review.	Future waste transfer notes for waste printer cartridges should be retained.	Critical	Obtain waste transfer notes from Lyreco.	Ian Cave	31/07/23	

### Woodgate Chambers

There were no NCRs raised.

## Management Review

12. A Management Review with the Strategic Leadership Team (SLT) was held on 14th June 2023 to discuss audit findings and recommendations. The report was well received with acknowledgement of the staff changes at sites and the continued hard work by building managers to ensure compliance. Training for building managers will be scheduled to ensure ongoing environmental legal compliance and continual improvement.

## Monitoring

13. To ensure actions identified by environmental audits are addressed in a timely way, the audit cycle is annual with a progress review, six months after the initial audit where Non-Conformance with Requirements (NCRs) raised in the first audit are followed up to determine progress. The outcome of the annual audit is considered by SLT and reported to Audit Committee.

## Timetable

14. The timetable for the 2023 environmental audit cycle is shown in the table below.

<b>Event</b>	<b>Description</b>	<b>Date</b>
Environmental Compliance Audit	To review effectiveness of environmental management system	April 2023
SLT Briefing of outcome	To consider non-compliance and any mitigating actions	June 2023
Audit Committee	To receive a report on the outcome of environmental audits	July 2023
Environmental Audits – Follow-up	To review the progress being made by building managers	October 2023

## Appendices

### Appendix A

#### Definitions - Audit Opinion

Opinion	Definition
Substantial	A sound system of governance, risk management and control exists, with internal controls operating effectively and being consistently applied to support the achievement of objectives in the area audited.
Reasonable	There is a generally sound system of governance, risk management and control in place. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of objectives in the area audited.
Limited	Significant legislative non-compliance identified. Improvement is required to the system of governance, risk management and control to effectively manage risks to the achievement of objectives in the area audited.
No Assurance	Immediate action is required to address legislative non-compliance identified. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of objectives in the area audited.

#### Recommendation Priority

Level	Definition
Critical	Recommendations which are of a very serious nature and could have a critical impact on the Council, for example to address a breach in law or regulation that could result in material fines/consequences.
High	Recommendations which are fundamental to the system and require urgent attention to avoid a breach in legislation.
Medium	Recommendations which, although not fundamental to the system, provide scope for improvements to be made.
Low	Recommendations concerning issues which are considered to be of a minor nature, but which nevertheless need to be addressed or potential opportunities to improve the operational efficiency and/ or effectiveness of the system.