

AUDIT COMMITTEE - 11TH JUNE 2019

Report of the Head of Planning and Regeneration Lead Member: Councillor Eric Vardy

Part A

ITEM ENVIRONMENTAL AUDITS

Purpose of Report

The purpose of this report is to update the Committee on the outcome of environmental audits undertaken for March 2019.

Recommendation

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

Reasons

To ensure the Committee is kept informed of the Council's approach to managing environmental risks related to the 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 Plan sets a commitment to 'take action to protect the environment for future generations' and the Council has adopted a Climate Change Strategy, a Carbon Management Plan, a Zero Waste Strategy and a Green Spaces Strategy 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. The Policy was adopted by Cabinet in October 2015 and establishes a framework for setting objectives and targets for environmental improvement. A Carbon Management Plan has been approved by Cabinet in December 2015 to reduce the Council's impact on climate change. A Climate Change Strategy was adopted by cabinet on 10th May 2018. The Climate Change Strategy provides the action plan for the Council to maintain and potentially improve its environmental performance.

Implementation Timetable including Future Decisions and Scrutiny

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

Report Implications

The following implications have been identified for this report.

Financial Implications

The costs of preparing and providing strategic management for the implementation of the Environmental Management System are met from within the Planning and Regeneration Service 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 Cabinet 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 Newground Legislation 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) | SMT and Audit Committees in place to review annual performance |

Sustainability

An 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.

Key Decision: No

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 / Information & Computer Services building, 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 programme overseen by the Senior Management Team. 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 Newground Legislation Update Service on a monthly basis.

Environmental Audits

3. Environmental audits took place during March 2019 to check legal compliance and implementation of the Environmental Management System. Audits included the Oak and Ark Business Centres, the Museum, Town Hall, Southfield Road offices, Information & Computer Services building 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 meeting with building managers took place on the 14th March 2019 to present the outcome of audit findings and recommendations. 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.

Audit Findings

5. The audit report presents any activity it considers to be posing an environmental risk as either a Non-Conformance with Requirement (NCR - a non-fulfilment of a legal requirement), an 'issue' or a 'recommendation'. The former is the more serious finding in the sense that there is proof that a legal requirement is not being

met, or a lack of evidence to prove that it is being met. An issue may be an instance where:

- a) there is not a non-fulfilment of a legal requirement, but there is a lack of environmental best practice being used.
- b) there is not currently a breach in legislation, but the issue should be addressed to avoid doing so in future.

A recommendation recognizes something which may later develop in to an NCR or issue and needs addressing.

6. Overall 25 Non-Conformance with Requirement (NCRs) and 17 Issues were found with 14 Recommendations being made. Legal compliance issues (NCRs) were found across all sites around granulation of waste duty of care paperwork, F-gas compliance and evidence gathering. Of the 25 NCRs, 10 have been resolved and 15 have programmes to ensure they are resolved in a timely manner. Of the 17 Issues, 3 have been completed and 14 have programmes to ensure they are resolved in a timely manner. Of the 15 Recommendations, 5 have been resolved and 9 have programmes to ensure they are resolved in a timely manner.
7. The audit findings are set out at Appendix A. A summary of the Non-Conformance with Requirement (NCR) findings is presented below by site:

Woodgate Chambers

8. Fluorescent tubes are being transferred from Woodgate Chambers to Southfield Road Offices for disposal. There was no hazardous waste consignment note for the transfer of waste fluorescent tubes from Woodgate Chambers to Southfield Road Offices (NCR 4). There is also no Upper Tier Waste Carriers Licence for the Council to transfer hazardous waste. Transfers between sites should be stopped until the correct course of action has been determined. The Council could set up a collection of waste by Mercury Recycling from Woodgate Chambers as and when needed or alternatively, obtain an Upper Tier Waste Carriers Licence and ensure that each time waste is transferred between sites a hazardous consignment note is completed.

Charnwood Museum and Carillon Tower

9. Mixed Recycling is collected through 'Love Loughborough' which is an initiative facilitated by Loughborough Business Improvement District. However, waste transfer documents have not been evidenced. No waste transfer documents for Love Loughborough mixed recycling collection or Clear-a-Bee waste collection were available (NCR 9). The waste transfer documents could not be accessed at the time of audit. The transfer notes should be sought from the carriers. The system which is used to store waste duty of care documentation should be easily accessible by all team members, and should contain all duty of care waste documentation. A weighbridge ticket has been provided for the collection of waste by Clear-a-Bee. This does not show details of the waste transfer. The transfer notes should be sought from Clear-a-Bee. Each time Clear-a-Bee come to site, Charnwood Museum staff should ask for a waste transfer note to sign before the operative leaves.

10. Fluorinated greenhouse gases (F-Gas) is contained in refrigeration, air-conditioning and fire protection systems. There are record keeping and maintenance requirements for companies that operate equipment containing F-Gas. There were no records of F-Gas inspections and servicing being carried out (NCR 11). If records can be found these should be placed in an easy to access place on the online system. These inspections should be undertaken annually so if no inspection is present one should be booked immediately. It is recommended to set up calendar reminders to ensure compliance is renewed annually. Reports should be placed in an easy to access place on the online system.
11. Under the TM44 regulations, companies are required to ensure that inspection of air conditioning systems are carried out. The inspection includes an assessment of the system's efficiency. There is no TM44 in place for the air conditioning unit used at site, which contains a refrigerant (NCR 12). A TM44 inspection should be booked immediately. A calendar reminder should be in place to ensure compliance is renewed every 5 years. Reports should be placed in an easy to access place on the online system.

Town Hall

12. There was no TM44 in place for the air handling units used at site, which contain a refrigerant (NCR 16). A TM44 inspection should be booked as soon as possible. Reports should be placed in an easy to access place on the online system. A calendar reminder could be set to ensure compliance is renewed every 5 years.

Oak Business Centre

13. Several wooden pallets were stacked in the car park next to the bins. Waste duty of care documentation for wooden pallets was not kept on site or accessible (NCR 20). It was verbally confirmed that these are collected by another company but the paperwork is kept by the company with no paperwork for this retained at the Oak Business Centre. This paperwork is required to be kept on site, or on a digital readily accessible system, so that waste duty of care compliance can be demonstrated. The paperwork should be acquired from the carrier immediately and kept on file. Each time the carrier comes to site, the Oak Business Centre staff should ask for a waste transfer note to sign before the operative leaves.

Ark Business Centre

14. There is currently a release of trade effluent to storm drains in the car park from the mobile vehicle washing unit, and tenants, which is not permitted (NCR24). A permit to discharge is required for this activity from either Severn Trent Water or the Environment Agency. Action required would be to obtain discharge consent to foul drainage for the wash-down of vehicles on site at Ark Business Centre and ensure that water does not drain to storm-water drains. Alternatively discontinue the activity of vehicle wash-down on the Ark Business Centre. Terms and conditions should be included within any lease agreement with tenants that this activity is not permitted on site. Additional control measures will probably be required to prevent discharge to storm water drains such as an interceptor.
15. If trade effluent leaving site goes down a storm drain, this falls under the remit of the Environment Agency. If the trade effluent runs off in to a sewer with foul water,

this falls under the sewerage provider (in this case Severn Trent Water). If this water must be discharged, the best option is to make sure it is discharged to a foul sewer. In order to do this, there needs to be an application to Severn Trent Water to discharge trade effluent. The composition, volume and frequency of discharge need to be included in the consent application. The best course of action would be to talk to tenants about what they are discharging and to where.

16. The law is complicated when it comes to determining liability in a landlord-tenant relationship. It is an offence under the Environmental Protection Act 1990 to “cause” or “knowingly permit” pollution at a site you own, so even though the Council are not causing the pollution, they are permitting it to occur, by acknowledging that the discharge is or may be taking place, but have taken no action. The tenants are as, if not more liable than the Council for discharging any chemicals to the drains, as they are “causing” the pollution. Tenancy agreements should be checked to see if there are any clauses about environmental liability or a clause that any illegal activity is forbidden under the terms of the tenancy. It is the tenant’s responsibility for what they discharge and they should be controlling their environmental risks.

Management Review

17. A Management Review took place on 23rd April with building managers and Heads of Service to discuss audit findings and recommendations. Control measures were determined for each action to ensure ongoing compliance. Audit actions will be included as part of the Legislation Update Service, which enables urgency of the action required, deadlines and management oversight to be coordinated. Training to building managers will be scheduled to ensure ongoing environmental legal compliance and continual improvement.

Monitoring

18. To ensure actions identified by environmental audits are addressed in a timely way, the audit cycle is annual with a follow up audit, six months after the initial audit where Non-Conformance with Requirement NCRs or notes raised in the first audit are followed up on to determine progress. The outcome of the annual audit is considered by SMT and reported to Audit Committee.

Timetable

19. The timetable for the 2019 environmental audit cycle is shown in the table below.

| Event | Description | Date |
|----------------------------------|--|--------------|
| Environmental Compliance Audit | To review effectiveness of environmental management system | March 2019 |
| SMT Briefing of outcome | To consider non-compliance and any mitigating actions | June 2019 |
| Audit Committee | To receive a report on the outcome of environmental audits | June 2019 |
| Environmental Audits – Follow-up | To review the progress being made by building managers | October 2019 |

Appendices

Appendix A - Summary Results of Internal Environmental Audits

Appendix A

Summary Results of Internal Audits

| Southfield Road Offices | | | | | | | | | | | | | | |
|-------------------------|-----------|-------------|---------------|---------------------------|---|--|------------|--------|--|--|---|--|--------------|---|
| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| NCR 1 | ESP | 08.02.19 | D Wall | Legal | Waste Documentation Lack of waste carriers licence | Inability to fulfil compliance obligations | 3 | 3 | General Waste and Mixed Recycling <i>Waste Transfer Season Ticket 1.11.18 to 31.10.19 between CBC and Serco on behalf of CBC.</i> A valid Waste Carrier's Licence must be present on the season ticket which is not currently seen. | Serco and CBC should determine the correct waste carrier's licence which should be included where missing. | Lack of appropriate note provided by waste companies. | Discussions with waste companies should be undertaken so that templates of notes have all the appropriate information on. If needed, CBC could create own template of note to ensure compliance is achieved. | Oct 2019 | Completed |
| | | | | | | | | | Scrap Metal <i>Waste Transfer Note showing Transfer on 08.01.19 in which CBC transferred scrap metal to TBD Morris Recycling Ltd. site in Shepshed.</i> The note requires a valid waste carrier's licence for CBC. | Serco and Charnwood BC should determine the correct waste carrier's licence which should be included where missing. | | | | Completed |
| | | | | | | | | | Confidential Waste <i>Waste Transfer Season Ticket 01.05.18 to 30.04.19 between CBC and ShredPro Ltd.</i> A waste carriers Licence for ShredPro is required. | ShredPro should be contacted to inform them that the waste carriers licence for ShredPro is missing. | | | | Completed |
| NCR 2 | ESP | 08.02.19 | D Wall | Legal | Waste Documentation SIC Code discrepancy | Inability to fulfil compliance obligations | 3 | 3 | Scrap Metal <i>Waste Transfer Note showing Transfer on 08.01.19 in which CBC transferred scrap metal to TBD Morris Recycling Ltd. site in Shepshed.</i> The note requires a valid SIC code for CBC. | TBD Morris Recycling should be contacted to inform them of the SIC code of Charnwood BC. SIC code should be 84.11/0 - General public administration duties | Lack of clarity as to what the SIC code is used for on notes and what it actually is (i.e. 84.11/0) | Discussions with waste providers should be undertaken so that templates of notes have the appropriate SIC code. If needed, CBC could create own template of note to ensure compliance is achieved. | Oct 2019 | Annual collection. Will be actioned at next collection |

| Southfield Road Offices | | | | | | | | | | | | | | |
|-------------------------|-----------|-------------|---------------|---------------------------|------|---------------------|------------|--------|---|--|------------|---|--------------|------------------------------------|
| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| | | | | | | | | | Confidential Waste <i>Waste Transfer Season Ticket 01.05.18 to 30.04.19 between CBC and ShredPro Ltd.</i> A SIC code for CBC is required. | ShredPro should be contacted to inform them of the SIC code of Charnwood BC. SIC code should be 84.11/0 - General public administration duties | | | | Completed |
| | | | | | | | | | Printer Cartridges <i>Waste Transfer Season Ticket 02.09.18 to 01.09.19 between CBC and Clover Environmental Solutions.</i> A SIC code for CBC is required. | Clover Environmental Services should be contacted to inform them of the SIC code for Charnwood BC. SIC code should be 84.11/0 - General public administration duties | | | | Completed |
| | | | | | | | | | Sanitary Waste <i>Waste Transfer Season Ticket 01.12.18 to 30.11.19 between CBC and Cathedral Hygiene.</i> The correct SIC Code for CBC is required. | Cathedral Hygiene should then be contacted to correct the error. SIC code should be 84.11/0 - General public administration duties | | | | Completed |
| | | | | | | | | | Fluorescent Tubes <i>Consignment note for removal of gas discharge lamps by Mercury Recycling limited.</i> The correct SIC Code for CBC is required. | Mercury Recycling should be contacted to correct the error. SIC code should be 84.11/0 - General public administration duties | | | | Completed |
| | | | | | | | | | Batteries <i>Consignment note from H J Enthoven Ltd dated 7/11/18 for transfer of batteries from Southfield Road Offices.</i> SIC code discrepancy found | H J Enthoven Ltd should be contacted to correct the error. SIC code should be 84.11/0 - General public administration duties | | | | Environmental Services progressing |

| Southfield Road Offices | | | | | | | | | | | | | | |
|-------------------------|-----------|-------------|---------------|---------------------------|--------|---|------------|--------|--|---|--|--|--------------|--|
| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| NCR 3 | ESP | 08.02.19 | D Wall | Legal | COSHH | Risk of release of chemicals to environment/human health if release not handled correctly or in timely manner | 2 | 4 | No COSHH R.A. or MSDS were readily available to hand. To manage environmental risk, it is important that COSHH Risk Assessments and Materials Safety Data Sheets (MSDS) are readily accessible in order to provide an emergency response to potential spills and release to air. | If COSHH Risk Assessments are available on the IT system then these should be printed and stored with chemicals at each site, as a hard copy. | Lack of regular review | A full COSHH Audit is recommended. This would entail the creation of a register of all chemicals used at site, the production of a COSHH Risk Assessment for each and the request/sourcing of an MSDS for each. It is recommended that these are kept in paper form where the chemicals are kept. If any chemicals are brought in to the site for use, a risk assessment and MSDS should be produced immediately, prior to both use and storage. | Oct 2019 | Completed A register has been created. Risk assessment and data sheets are being obtained. |
| Issue 1 | ESP | 08.02.19 | D Wall | System | System | | | | Facilities management operates its own environmental management system separate to the centralised system. Although an environmental system is being used by the Facilities Manager and their department, this system is not the system which is used by Environmental Services team or the Sustainability Officer. This system has been devised by Facilities Management and operates independently. It is located on a shared drive which not accessible to anyone other than Facilities Management. | Consideration as to how appropriate the current EMS is should be undertaken, and discussions with building managers should determine the best course of action to manage the environmental risks, opportunities and compliance obligations at each site. A brief guide on the requirements of such a system should be produced. | Centralised system not appropriate for localised operational requirements of site. | Though best practice would be to have a system accessible by both the sites and the Sustainability Officer, a separate system for storage of documents and active environmental management would be appropriate as long as the IT and physical documents meet the legal and other compliance requirements of CBC. | Oct 2019 | Legislation Update System (LUS) to be used to store EMS documentation. All sites will have access. Training to be provided September 2019. |

| Southfield Road Offices | | | | | | | | | | | | | | |
|-------------------------|-----------|-------------|------------------------|---------------------------|---------------------|--|------------|--------|--|--|--|---|--------------|--|
| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| Issue 2 | ESP | 08.02.19 | D Wall | Operational | Waste | Inability to fulfil compliance obligations | 4 | 1 | Clear waste bags filled with recycling and general waste mixed together were left next to the bins in the car park. | The reason for lack of collection by Serco must be determined via discussions with Serco. All of the bagged waste which is mixed should be disposed of in the general waste bin. | Currently unclear - though this is a new contract experiencing "teething problems" | A plan of action should be formed with Serco based on the discussion - e.g. More bins are needed if overflowing waste was the reason for the bags not being disposed of, or perhaps more education in waste segregation for building users. | Oct 2019 | A change of waste contractor caused a capacity issue. This has now been resolved. |
| Issue 3 | ESP | 08.02.19 | Environmental Services | System | Waste Documentation | | | | There was no evidence available to suggest that CBC Environmental Services co-ordinate the consignment of waste batteries from the Southfield Road Offices. If this is the case, the relevant duty of care compliance paperwork needs to be produced. | This should be located and filed with the other waste duty of care compliance documentation as appropriate. If not available, then CBC Environmental Services should be contacted to obtain this information | Centralised system not appropriate for localised operational requirements of site. | The system which is used to store waste duty of care documentation should be easily accessible by all team members. | Oct 2019 | Environmental Services progressing |
| Issue 4 | ESP | 08.02.19 | D Wall | Operational | F-Gas | Inability to fulfil compliance obligations | 4 | 2 | There is no evidence to suggest that the engineers working on behalf of the Council are competent in F-Gas handling. An air conditioning cassette was used in the cafe cupboard. There is no evidence that the F Gas engineer from Incentive TEC has competency to carry out f-gas handling. | Incentive TEC should be contacted to obtain the f-gas competency of the last engineer to carry out f-gas inspections at site. | Lack of awareness that this was a requirement | Each time an F-gas engineer visits site, the competence should be requested either prior to or on the day of the visit, and a copy should be kept on file until the next visit. | Oct 2019 | Complete |
| Recommendation 1 | ESP | 08.02.19 | D Wall | Operational | Waste | Inability to fulfil compliance obligations | 1 | 3 | Items in storage areas are somewhat haphazardly placed and it is a concern of the auditor that it may not be known the status (i.e. Is it waste?) of some items | Labelling for items in storage areas should be considered to ease organisation | N/A | N/A | Oct 2019 | Complete |
| Recommendation 2 | ESP | 08.02.19 | D Wall | Operational | Waste | Landfill disposal of recyclable material | 3 | 1 | Food waste being disposed of in general office waste | Immediate Action is unlikely, but long term action is recommended. | Lack of staff co-operation. | Staff awareness raising programme | Oct 2019 | Staff awareness raising to be put in place |

| Southfield Road Offices | | | | | | | | | | | | | | |
|-------------------------|-----------|-------------|------------------------|---------------------------|-------|--|------------|--------|--|--|---|---|--------------|-------------------|
| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| Recommendation 3 | ESP | 08.02.19 | Environmental Services | Operational | Waste | Inability to fulfil compliance obligations | 1 | 3 | Badger carcasses should not be kept on site for more than 12 months without a waste permit | It should be determined whether any carcasses are in the bin. | No root cause analysis necessary - auditor required clarification | No action required. | Oct 2019 | Isolated incident |
| Recommendation 4 | ESP | 08.02.19 | D Wall | Operational | F-Gas | Inability to fulfil compliance obligations | 2 | 4 | The last F-Gas inspection was on the 05.01.18, therefore another is due now | Consult service agreement with Incentive TEC to determine date of next inspection. | Service agreement means F-Gas audit not covered for a full year. | The service agreement should be reviewed to ensure that the inspections mean Charnwood BC is compliant with law for a whole year. | Oct 2019 | Completed |

| Woodgate Chambers | | | | | | | | | | | | | | |
|-------------------|-----------|-------------|---------------|---------------------------|---------------------|--|------------|--------|--|--|---|--|--------------|---|
| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| NCR 4 | ESP | 08.02.19 | D Wall | Legal | Waste Documentation | Inability to fulfil compliance obligations | 4 | 3 | There is no hazardous waste consignment note for the transfer of waste fluorescent tubes from Woodgate Chambers to Southfield Road Offices. There is also no Upper Tier Waste Carriers Licence for Charnwood BC to transfer hazardous waste. | Stop transfers between sites until the correct course of action has been determined. | Lack of awareness that this was a requirement | CBC could set up collection of waste by Mercury Recycling Ltd. from Woodgate Chambers as and when needed (n.b. Waste should not be stored on site for more than 12 months). Alternatively, CBC could obtain an Upper Tier Waste Carriers Licence and ensure that each time waste is transferred between sites a hazardous consignment note is completed. | Oct 19 | Housing Services required to obtain an Upper Tier Waste Carriers Licence All transfers have been stopped until the upper tier waste transfer licence has been obtained by Housing. |

| Woodgate Chambers | | | | | | | | | | | | | | |
|-------------------|-----------|-------------|---------------|---------------------------|---------------------|---|------------|--------|---|--|--|--|--------------|---|
| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| NCR 5 | ESP | 08.02.19 | D Wall | Legal | Waste Documentation | Inability to fulfil compliance obligations | 4 | 2 | General Waste and Mixed Recycling Waste Transfer Season Ticket 1.11.18 to 31.10.19 between CBC and Serco on behalf of CBC. A valid Waste Carrier's Licence must be present on the season ticket which is not currently evident. | Serco and Charnwood BC should determine the correct waste carrier's licence which should be included where missing. | No space on form for waste carriers licence | Discussions with waste providers should be undertaken so that templates of notes have all the appropriate information on. If needed, CBC could create own template of note to ensure compliance is achieved. | Oct 19 | Completed |
| NCR 6 | ESP | 08.02.19 | D Wall | Legal | COSHH | Risk of release of chemicals to environment/human health if release not handled correctly or in timely manner | 1 | 4 | No COSHH R.A. or MSDS readily available. To manage environmental risk, it is important that COSHH Risk Assessments and Materials Safety Data Sheets (MSDS) are readily accessible in order to provide an emergency response to potential spills and release to air. These Risk Assessments and MSDS need to be readily accessible in the event of an emergency. | If COSHH Risk Assessments are available on the IT system then these should be printed and stored with chemicals at each site, as a hard copy. | Lack of regular review | A full COSHH Audit is recommended. This would entail the creation of a register of all chemicals used at site, the production of a COSHH Risk Assessment for each and the request/sourcing of an MSDS for each. It is recommended that these are kept in paper form where the chemicals are kept. If any chemicals are brought in to the site for use, a risk assessment and MSDS should be produced immediately, prior to both use and storage. | Oct 19 | Completed A register has been created. Risk assessment and data sheets are being obtained. |
| Issue 5 | ESP | 08.02.19 | D Wall | System | System | Inability to fulfil compliance obligations | 3 | 1 | Although an environmental system is being used by the Facilities Manager and their department, this system is not the system which is used by Environmental Services team or the Sustainability Officer. This system has been devised by Facilities Management and operates independently. It is located | Consideration as to how appropriate the current EMS is should be undertaken, and discussions with building managers should determine the best course of action to manage the environmental risks, opportunities and compliance | Centralised system not appropriate for localised operational requirements of site. | Though best practice would be to have a system accessible by both the sites and the Sustainability Officer, a separate system for storage of documents and active environmental management would be appropriate as long as the IT and | Oct 19 | Legislation Update System (LUS) to be used to store EMS documentation. All sites will have access. |

| Woodgate Chambers | | | | | | | | | | | | | | |
|-------------------|-----------|-------------|---------------|---------------------------|-------|---------------------|------------|--------|---|--|--|---|--------------|---|
| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| | | | | | | | | | on a shared drive which not accessible to anyone other than Facilities Management. | obligations at each site. A brief guide on the requirements of such a system should be produced. | | physical documents meet the legal and other compliance requirements of CBC. | | Training to be provided September 2019. |
| Recommendation 5 | ESP | 08.02.19 | D Wall | Operational | Waste | Fly-tipping | 2 | 2 | At Woodgate Chambers, the caged area containing the bins had a padlock loop but was not locked at the time of the visit. The bins were also not locked and one bin was overflowing with cardboard waste. It is recommended that this gate is locked to deter fly-tipping. | If the lock is broken or a padlock is required, this should be bought or sourced. | Ease of access prioritised over security of waste. | To avoid this occurring again, a check of the bin store is advised by whoever opens the building at the start of day. Signage stating that the bin area should be locked when not in use is also advised. | Oct 19 | Completed Padlock now in place |

| Charnwood Museum | | | | | | | | | | | | | | |
|------------------|-----------|-------------|---------------|---------------------------|---------------------|--|------------|--------|---|---|--|---|--------------|------------------|
| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| NCR 7 | ESP | 08.02.19 | C Costelow | Legal | Waste Documentation | Inability to fulfil compliance obligations | 3 | 3 | General waste and recycling is collected by Veolia and is collected under mixed municipal waste 20 01 03. The waste transfer note season ticket is not signed by Charnwood BC. A signed copy of this note should be kept on file by Charnwood BC. | The transfer notes should be sought from the carriers. | Not receiving correct paperwork from Clear-a-Bee | Discussions with waste providers should be undertaken so that templates of notes have all the appropriate information on. If needed, Charnwood BC could create their own template of note to ensure compliance is achieved. | Oct 19 | Being progressed |
| NCR 8 | ESP | 08.02.19 | C Costelow | Legal | Waste Documentation | Inability to fulfil compliance obligations | 3 | 3 | Sanitary Waste Sanitary waste is collected by Initial. The waste transfer note provided has no SIC code. | Initial should be contacted to provide them with the correct SIC code for Charnwood BC. | Lack of clarity as to what the SIC code is used for on notes and what it actually is | Discussions with waste providers should be undertaken so that templates of notes have the appropriate SIC code. If needed, Charnwood BC could | Oct 19 | Being progressed |

| Charnwood Museum | | | | | | | | | | | | | | |
|------------------|-----------|-------------|---------------|---------------------------|---------------------|--|------------|--------|---|--|---|--|--------------|------------------|
| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| | | | | | | | | | | | (i.e. 84.11/0) | create their own template of a note to ensure compliance is achieved. | | |
| | | | | | | | | | General Waste and Mixed Recycling General waste and recycling is collected by Veolia and is collected under mixed municipal waste. There is a discrepancy in the SIC code used on notes for the other sites. | Veolia should be contacted to provide them with the correct SIC code for Charnwood BC. | Lack of clarity as to what the SIC code is used for on notes and what it actually is (i.e. 84.11/0) | Discussions with waste providers should be undertaken so that templates of notes have the appropriate SIC code. If needed, CBC could create their own template of a note to ensure compliance is achieved. | Oct 19 | Being progressed |
| NCR 9 | ESP | 08.02.19 | C Costelow | Legal | Waste Documentation | Inability to fulfil compliance obligations | 4 | 3 | Mixed Recycling Mixed Recycling is collected through 'Love Loughborough' which is an initiative facilitated by Loughborough Business Improvement District. However, waste transfer documents have not been evidenced. The waste transfer documents could not be accessed at the time of audit. | The transfer notes should be sought from the carriers. | Not receiving or storing paperwork from Love Loughborough. | The system which is used to store waste duty of care documentation should be easily accessible by all team members, and should contain all duty of care waste documentation. | Oct 19 | Being progressed |
| | | | | | | | | | Clear-a-Bee A weighbridge ticket has been provided for the collection of waste by Clear-a-Bee. This does not show details of the waste transfer. | The transfer notes should be sought from Clear-a-Bee. | Lack of record keeping and lack of awareness from Clear-a-Bee | Each time Clear-a-Bee come to site, Charnwood Museum staff should ask for a waste transfer note to sign before the operative leaves. | Oct 19 | Being progressed |

| Charnwood Museum | | | | | | | | | | | | | | |
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| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| NCR 10 | ESP | 08.02.19 | C Costelow | Legal | COSHH | Risk of release of chemicals to environment/human health if release not handled correctly or in timely manner | 1 | 4 | No COSHH R.A. or MSDS readily available. To manage environmental risk, it is important that COSHH Risk Assessments and Materials Safety Data Sheets (MSDS) are readily accessible in order to provide an emergency response to potential spills and release to air. These Risk Assessments and MSDS need to be readily accessible in the event of an emergency. The notes are kept on the IT system and were not readily accessible. | If COSHH Risk Assessments are available on the IT system then these should be printed and stored with chemicals at each site, as a hard copy. | Lack of emergency planning | A full COSHH Audit is recommended. This would entail the creation of a register of all chemicals used at site, the production of a COSHH Risk Assessment for each and the request of an MSDS for each. It is recommended that these are kept in paper form where the chemicals are kept. If chemicals are being transported from the Museum to the Carillon, a COSHH folder should be kept in the Carillon also. If any chemicals are brought in to the site for use, a risk assessment and MSDS should be produced immediately, prior to both use and storage. | Oct 19 | Being progressed |
| NCR 11 | ESP | 08.02.19 | C Costelow | Legal | Air con | Inability to fulfil compliance obligations | 4 | 3 | There are no records of F-Gas inspections and servicing being carried out | If records can be found these should be placed in an easy to access place on the online system. These inspections should be undertaken annually so if no inspection is present one should be booked immediately. | Not known | Set up calendar reminders to ensure compliance is renewed annually. Reports should be placed in an easy to access place on the online system. | Oct 19 | Being progressed |
| NCR 12 | ESP | 08.02.19 | C Costelow | Legal | Air con | Inability to fulfil compliance obligations | 4 | 3 | There is no TM44 in place for the air conditioning unit used at site, which contains a refrigerant. | A TM44 inspection should be booked immediately. | Lack of awareness that this was a requirement | Set up calendar reminders to ensure compliance is renewed every 5 years. Reports should be placed in an easy to access place on the online system. | Oct 19 | Check unit size. If under 12kw regulations do not apply. |

| Charnwood Museum | | | | | | | | | | | | | | |
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| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| Issue 6 | ESP | 08.02.19 | C Costelow | System | System | | | | NCR Previously raised about the equipment on the balcony has not been resolved after 6 months. | No immediate action can be taken but ensure sources of ignition are placed away from the items. | Lack of appropriate storage space | A more appropriate storage area needs to be found for if such an eventuality happens again. This should be in an area away from visitors. | Oct 19 | Lottery bid in place for Carillon project Review storage options due to length of project |
| Issue 7 | ESP | 08.02.19 | C Costelow | System | System | | | | Facilities management operates its own environmental management system separate to the centralised system. This is not always easily accessible. Although an environmental system is being used by the Building Manager and their department, this system is not the system which is used by Environmental Services team or the Sustainability Officer. This system has been devised by Management of the Museum and operates independently. It is located on a drive which not accessible to anyone other than Museum Management. | Consideration as to how appropriate the current EMS is should be undertaken, and discussions with building managers should determine the best course of action to manage the environmental risks, opportunities and compliance obligations at each site. A brief guide on the requirements of such a system should be produced. | Centralised system not appropriate for localised operational requirements of site. | Though best practice would be to have a system accessible by both the sites and the Sustainability Officer, a separate system for storage of documents and active environmental management would be appropriate as long as the IT and physical documents meet the legal and other compliance requirements of CBC. | Oct 19 | Legislation Update System (LUS) to be used to store EMS documentation. All sites will have access. Training to be provided September 2019. |
| Issue 8 | ESP | 08.02.19 | C Costelow | Operational | Waste | Inability to fulfil compliance obligations | 4 | 1 | The waste cooking oil stored in the waste yard prior to collection is not stored sufficiently to avoid contamination of a nearby drain if the containment system were to fail. | A containment method is required which can hold at least 110% of the maximum amount of oil which will be stored at any one time. This could take the form of a drip tray or tank. If the waste oil must be stored outside then this should be covered to ensure that rain water does not fill the containment system. | Lack of awareness that this was a requirement. | A limit to the amount of oil (this must be under 200L) which can be stored in the containment system at any one time is required to be determined with the cafe, based on waste collection and use of oil. This will ensure that the containment method is not overfilled. | Oct 19 | Being progressed |

| Charnwood Museum | | | | | | | | | | | | | | |
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| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| Recommendation 6 | ESP | 08.02.19 | C Costelow | Operational | Waste | | | | Waste fluorescent tubes should not be kept on site for more than 12 months. This is something the museum should be aware of for future reference. | Conversations with staff should determine when the fluorescent tubes became waste. | Lack of clarity and labelling | A labelling system for the waste tubes could be set up so that a sticker is added to each piece of waste and therefore how long it has been on site can be determined. These stickers should be checked every few months. | Oct 19 | Being progressed |
| Recommendation 7 | ESP | 08.02.19 | C Costelow | Operational | Energy | | | | Investigation in to installation of de-stratification fans is recommended. | N/A | N/A | N/A | Oct 19 | Being progressed |
| Recommendation 8 | ESP | 08.02.19 | C Costelow | System | System | | | | A root-cause analysis of the reason for storage of items on the balcony should be undertaken. | See Issue 6 | See Issue 6 | See Issue 6 | Oct 19 | Being progressed |

| Town Hall | | | | | | | | | | | | | | |
|-----------|-----------|-------------|---------------|---------------------------|---------------------|--|------------|--------|---|---|---|--|--------------|--|
| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| NCR 13 | ESP | 08.02.19 | K Cutts | Legal | Waste | Inability to fulfil compliance obligations | 3 | 2 | In the yard there are several paint tins with drying paint inside. This paint is drying so that it can be disposed of. There is risk that with lids off the tins, rain water could mix with wet paint and be released to the drains via run off. It could also contaminate the non-hazardous waste it is stored outside with. | These tins should either be stored inside away from drains, or outside in a bunded area. | Lack of emergency preparedness | A dedicated area for drying paint should be set up in or storage cupboard or similar area. | Oct 19 | Being progressed A metal cabinet may be used to contain paint tins. |
| NCR 14 | ESP | 08.02.19 | K Cutts | Legal | Waste Documentation | Inability to fulfil compliance obligations | 4 | 1 | Fluorescent tubes and batteries are collected by Mercury Recycling Ltd. and are stored in a secure coffin in the yard. The hazardous waste consignment note dated 22.03.18 shows the SIC code 43.21/0 which is different to the organisation's SIC code of | The correct SIC code for Charnwood BC should be communicated to Mercury Recycling Ltd. and Love Loughborough. | Lack of clarity as to what the SIC code is used for on notes and what it actually is (i.e. 84.11/0) | Discussions with waste providers should be undertaken so that templates of notes have the appropriate SIC code. If needed, the Council could create a template of note to ensure | Oct 19 | Being progressed |

| Town Hall | | | | | | | | | | | | | | |
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| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| | | | | | | | | | 84.11/0. There is no SIC code on the waste transfer note between Love Loughborough and CBC. | | | compliance is achieved. | | |
| NCR 15 | ESP | 08.02.19 | K Cutts | Legal | COSHH | Risk of release of chemicals to environment/ human health if release not handled correctly or in timely manner | 1 | 4 | No COSHH R.A. or MSDS readily available. To manage environmental risk, it is important that COSHH Risk Assessments and Materials Safety Data Sheets (MSDS) are readily accessible in order to provide an emergency response to potential spills and release to air. These Risk Assessments and MSDS need to be readily accessible in the event of an emergency. The notes are kept on the IT system and were not readily accessible. Three chemicals were sampled which are used (C1T - RTU Cleaner Sanitiser, Bactosol Beerline Cleaner and Dr Johnson's Sterilising Fluid). MSDS sheets and COSHH assessments could not be found at the time of audit. | If COSHH Risk Assessments are available on the IT system then these should be printed and stored with chemicals at each site, as a hard copy. | Lack of review | A full COSHH Audit is recommended. This would entail the creation of a register of all chemicals used at site, the production of a COSHH Risk Assessment for each and the request/sourcing of an MSDS for each. It is recommended that these are kept in paper form where the chemicals are kept. If any chemicals are brought in to the site for use, a risk assessment and MSDS should be produced immediately, prior to both use and storage. | Oct 19 | Being progressed |
| NCR 16 | ESP | 08.02.19 | K Cutts | Legal | AHU | Inability to fulfil compliance obligations | 4 | 3 | There is no TM44 in place for the air handling units used at site, which contain a refrigerant. | A TM44 inspection should be booked immediately. | Lack of awareness that this was a requirement | Set up calendar reminders to ensure compliance is renewed every 5 years. Reports should be placed in an easy to access place on the online system. | Oct 19 | Being progressed Inspection booked June 2019 |

| Town Hall | | | | | | | | | | | | | | |
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| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| Issue 9 | ESP | 08.02.19 | K Cutts | System | System | | | | Facilities management operates its own environmental management system separate to the centralised system. This is not always easily accessible. Although an environmental system is being used by the Building Manager and their department, this system is not the system which is used by Environmental Services team or the Sustainability Officer. This system has been devised by Management of the Town Hall and operates independently. It is located on a drive which not accessible to anyone other than Town Hall Management. No evidence of waste duty of care compliance could be provided for General Waste (Bakers), Mixed Recycling (Bakers), Mixed Recycling (Love Loughborough Scheme), Glass (Bakers) and Sanitary Waste, as the team member who manages the waste compliance was off sick on the day of audit. This documentation should be readily accessible by at least one team member on site at any time to demonstrate compliance. | Consideration as to how appropriate the current EMS is should be undertaken, and discussions with building managers should determine the best course of action to manage the environmental risks, opportunities and compliance obligations at each site. A brief guide on the requirements of such a system should be produced. | Centralised system not appropriate for localised operational requirements of site. | Though best practice would be to have a system accessible by both the sites and the Sustainability Officer, a separate system for storage of documents and active environmental management would be appropriate as long as the IT and physical documents meet the legal and other compliance requirements of Charnwood BC. | Oct 19 | Legislation Update System (LUS) to be used to store EMS documentation. All sites will have access. Training to be provided September 2019. |

| Town Hall | | | | | | | | | | | | | | |
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| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| Issue 10 | ESP | 08.02.19 | K Cutts | Operational | AHU | Inability to fulfil compliance obligations | 4 | 1 | Carrier Air Handling undertake maintenance and are REFCOM registered (REF1009625). It is unclear whether the engineers working on behalf of the Council are competent in F-Gas handling. | Carrier Air Handling should be contacted to obtain the f-gas competency of the last engineer to carry out f-gas inspections at site. | Lack of awareness that this was a requirement | Each time an F-gas engineer visits site, the competence should be requested either prior to or on the day of the visit, and a copy should be kept on file until the next visit. | Oct 19 | Completed |
| Recommendation 9 | ESP | 08.02.19 | K Cutts | Operational | Waste | | | | Waste in yard is mixed together and kept in a disorganised fashion. | Waste stored in the yard should be tidied and segregated properly. | N/A | Segregation of yard sections is recommended. | | Being progressed |
| Recommendation 10 | ESP | 08.02.19 | K Cutts | Operational | Energy | | | | A lighting expert should be employed to determine a more energy efficient lighting solution for the foyer. | | | | | Being progressed |
| Recommendation 11 | ESP | 08.02.19 | K Cutts | Operational | AHU | | | | F-Gas equipment should be properly labelled. | | | | | Being progressed |

| Oak Business Centre | | | | | | | | | | | | | | |
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| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| NCR 17 | ESP | 08.02.20 | D Wall E Oliff | Legal | Waste documentation | Inability to fulfil compliance obligations | 4 | 2 | Waste Transfer Season Ticket 1.11.18 to 31.10.19 between CBC and Serco on behalf of CBC needs a valid Waste Carrier's Licence must be present on the season ticket which is not currently seen. | Serco and Charnwood BC should determine the correct waste carriers licence which should be included where missing. | Lack of appropriate note provided by waste companies. | Discussions with waste providers should be undertaken so that templates of notes have all the appropriate information on. If needed, Charnwood BC could create a template of note to ensure compliance is achieved. | Oct 19 | Completed |
| NCR 18 | ESP | 08.02.19 | D Wall E Oliff | Legal | Waste documentation | Inability to fulfil compliance obligations | 1 | 4 | Waste Transfer Season Ticket 1.11.18 to 31.10.19 between CBC and Serco on behalf of CBC has a SIC Code on the waste transfer notes which does not reflect the SIC code for Charnwood BC as a whole. Waste Transfer Season Ticket 23.10.18 to 22.10.19 between CBC and Cathedral Hygiene - the SIC Code on the waste transfer notes does not reflect the SIC code for Charnwood BC as a whole | The correct SIC code for Charnwood BC should be communicated to Serco and Charnwood BC. The correct SIC code for Charnwood BC should be communicated to Cathedral Hygiene. | Lack of clarity as to what the SIC code is used for on notes and what it actually is (i.e. 84.11/0) | Discussions with waste providers should be undertaken so that templates of notes have the appropriate SIC code. If needed, the Council can create a template of note to ensure compliance is achieved. | Oct 19 | Completed |
| NCR 19 | ESP | 08.02.19 | D Wall E Oliff | Legal | Waste documentation | Inability to fulfil compliance obligations | 4 | 3 | A waste transfer note is required for transfer of waste fluorescent tubes from one site to another. There are waste fluorescent tubes in the basement of the Oak Business Centre. It was verbally confirmed that the tubes are removed regularly by the Property Team and taken to the coffin at the Southfield Road Offices. This transfer would require a hazardous waste consignment note for the movement of the waste tubes and the appropriate licence | The documents should be sourced on the IT system or requested from the waste management companies. If a hazardous note is not being produced for the transfer of fluorescent tubes, this should be completed at the next collection. | Lack of awareness that this was a requirement | The system which is used to store waste duty of care documentation should be easily accessible by all team members. If a hazardous note is not being produced for the transfer of fluorescent tubes, this should be completed for all collections. | Oct 19 | Housing Services required to obtain an Upper Tier Waste Carriers Licence All transfers have been stopped until the upper tier waste transfer licence has been obtained by Housing, |

| Oak Business Centre | | | | | | | | | | | | | | |
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| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| NCR 20 | ESP | 08.02.19 | D Wall E Oliff | Legal | Waste documentation | Inability to fulfil compliance obligations | 4 | 3 | Several wooden pallets were stacked in the car park next to the bins. It was verbally confirmed that these are collected by another company but the paperwork is kept by the company with no paperwork for this retained at the Oak Business Centre. This paperwork is required to be kept on site, or on a digital readily accessible system, so that waste duty of care compliance can be demonstrated. | The paperwork should be acquired from the carrier immediately and kept on file. | Lack of awareness that this was a requirement | Each time the carrier comes to site, the Oak Business Centre staff should ask for a waste transfer note to sign before the operative leaves. | Oct 19 | Being progressed |
| NCR 21 | ESP | 08.02.19 | D Wall E Oliff | Legal | COSHH | Risk of release of chemicals to environment/human health if release not handled correctly or in timely manner | 3 | 2 | No COSHH R.A. or MSDS readily available. To manage environmental risk, it is important that COSHH Risk Assessments and Materials Safety Data Sheets (MSDS) are readily accessible in order to provide an emergency response to potential spills and release to air. These Risk Assessments and MSDS need to be readily accessible in the event of an emergency. Although the cleaning cupboard has a signposting document to show where to access the COSHH Risk Assessments and MSDS's, these are not easily accessible in the case of an emergency. | If COSHH Risk Assessments are available on the IT system then these should be printed and stored with chemicals at each site, as a hard copy. | Lack of regular review | A full COSHH Audit is recommended. This would entail the creation of a register of all chemicals used at site, the production of a COSHH Risk Assessment for each and the request/sourcing of an MSDS for each. It is recommended that these are kept in paper form where the chemicals are kept. If any chemicals are brought in to the site for use, a risk assessment and MSDS should be produced immediately, prior to both use and storage. | Oct 19 | Completed |

| Oak Business Centre | | | | | | | | | | | | | | |
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| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| Issue 11 | ESP | 08.02.19 | D Wall | System | System | | | | Facilities management operates its own environmental management system separate to the centralised system. Although an environmental system is being used by the Facilities Manager and their department, this system is not the system which is used by Environmental Services team or the Sustainability Officer. This system has been devised by Facilities Management and operates independently. It is located on a shared drive which not accessible to anyone other than Facilities Management. | Consideration as to how appropriate the current EMS is should be undertaken, and discussions with building managers should determine the best course of action to manage the environmental risks, opportunities and compliance obligations at each site. A brief guide on the requirements of such a system should be produced. | Centralised system not appropriate for localised operational requirements of site. | Though best practice would be to have a system accessible by both the sites and the Sustainability Officer, a separate system for storage of documents and active environmental management would be appropriate as long as the IT and physical documents meet the legal and other compliance requirements of Charnwood BC. | Oct 19 | Legislation Update System (LUS) to be used to store EMS documentation. All sites will have access. Training to be provided September 2019. |
| Issue 12 | ESP | 08.02.19 | D Wall E Oliff | Operational | Waste | Inability to fulfil compliance obligations | 4 | 2 | There are loose cigarette butts on the ground in the car park. | These should be removed immediately by an appropriate party. | Lack of staff co-operation. | Verbal and written warnings and signage above cigarette bin. | Oct 19 | Being progressed |
| Issue 13 | ESP | 08.02.19 | D Wall E Oliff | Operational | Waste | Inability to fulfil compliance obligations | 4 | 2 | Fluorescent tubes loose and at risk of breakage. | It is recommended that tubes are stored in a coffin or similar box to reduce the risk of breakage. | Lack of awareness that this was a requirement. | As in immediate action. | Oct 19 | Being progressed |
| Issue 14 | ESP | 08.02.19 | D Wall E Oliff | Operational | Waste | Inability to fulfil compliance obligations | 4 | 2 | The bins are accessible to the public if the gates to the car park are open. There is not currently an issue with fly-tipping at this site, but the bins should be secured by the gate while not in use, or contained within a locked area, to keep the waste safe and secure. | The access to the bin area can perhaps be coordinated with a current key-fob system or similar. | Lack of awareness that this was a requirement. | As in immediate action. | Oct 19 | Change in contractor has led to plastic bins with no lock rather than previous metal lockable containers |
| Recommendation 12 | ESP | 08.02.19 | D Wall E Oliff | Operational | Waste | | | | Items in storage areas are somewhat haphazardly placed and it is a concern of the auditor that it may not be known the status (i.e. Is it waste?) of some items | Labelling for items in basement should be considered to ease organisation. | | | | Completed |

| Oak Business Centre | | | | | | | | | | | | | | |
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| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| Recommendation 13 | ESP | 08.02.19 | D Wall E Oliff | Operational | Energy | | | | Outside lights in the car park were left on all day. Photocells for these lights could reduce the use of the lighting when not required | N/A | | | | Being progressed |

| Ark Business Centre | | | | | | | | | | | | | | |
|---------------------|-----------|-------------|----------------|---------------------------|---------------------|--|------------|--------|--|--|---|--|--------------|---|
| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| NCR 22 | ESP | 08.02.19 | D Wall E Oliff | Legal | Waste documentation | Inability to fulfil compliance obligations | 4 | 2 | Waste Transfer Season Ticket 1.11.18 to 31.10.19 between CBC and Serco on behalf of CBC needs a valid Waste Carrier's Licence present on the season ticket which is not currently seen | Serco and Charnwood BC should determine the correct waste carriers licence which should be included where missing. | Lack of appropriate note provided by waste companies. | Discussions with waste providers should be undertaken so that templates of notes have all the appropriate information on. If needed, CBC could create own template of note to ensure compliance is achieved. | Oct 19 | Completed |
| NCR 23 | ESP | 08.02.19 | D Wall E Oliff | Legal | Waste documentation | Inability to fulfil compliance obligations | 4 | 2 | Waste Transfer Season Ticket for mixed municipal waste between CBC and Serco on behalf of CBC does not reflect the SIC code for Charnwood BC as a whole. Waste Transfer Season Ticket between CBC and Cathedral Hygiene does not reflect the SIC code for Charnwood BC as a whole. | The correct SIC code for Charnwood BC should be communicated to Serco and Charnwood BC. The correct SIC code for Charnwood BC should be communicated to Cathedral Hygiene. | Lack of clarity as to what the SIC code is used for on notes and what it actually is (i.e. 84.11/0) | Discussions with waste providers should be undertaken so that templates of notes have the appropriate SIC code. If needed, Charnwood BC could create own template of note to ensure compliance is achieved. | Oct 19 | Completed |
| NCR 24 | ESP | 08.02.20 | D Wall E Oliff | Legal | Water | Inability to fulfil compliance obligations | 4 | 3 | Charnwood BC require a permit for the discharge of trade effluent in to drains managed by the site, from the mobile vehicle washer | Charnwood BC require a permit for the discharge of trade effluent in to drains managed by the site, from the mobile vehicle washer | Lack of awareness that this was a requirement | Until a permit is acquired, a notice should be issued to tenants that they are not to order the mobile washing unit until further notice. | Oct 19 | Being progressed All tenants have been notified 6 tenants have been identified with discharges to storm water Potential to cripple a small |

| Ark Business Centre | | | | | | | | | | | | | | |
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| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| | | | | | | | | | | | | | | business if worked stopped immediately Cost for a site interceptor would require capital expenditure. |
| NCR 25 | ESP | 08.02.19 | D Wall E Oliff | Legal | COSHH | Risk of release of chemicals to environment/human health if release not handled correctly or in timely manner | 1 | 4 | No COSHH R.A. or MSDS readily available. To manage environmental risk, it is important that COSHH Risk Assessments and Materials Safety Data Sheets (MSDS) are readily accessible in order to provide an emergency response to potential spills and release to air. These Risk Assessments and MSDS need to be readily accessible in the event of an emergency. | If COSHH Risk Assessments are available on the IT system then these should be printed and stored with chemicals at each site, as a hard copy. | Lack of regular review | A full COSHH Audit is recommended. This would entail the creation of a register of all chemicals used at site, the production of a COSHH Risk Assessment for each and the request/sourcing of an MSDS for each. It is recommended that these are kept in paper form where the chemicals are kept. If any chemicals are brought in to the site for use, a risk assessment and MSDS should be produced immediately, prior to both use and storage. | Oct 19 | Completed |

| Ark Business Centre | | | | | | | | | | | | | | |
|---------------------|-----------|-------------|----------------|---------------------------|---------------------|--|------------|--------|--|---|--|---|--------------|--|
| Issue | Raised by | Date Raised | Process Owner | Subject of Non-Conformity | Area | Overall Risk Rating | Likelihood | Impact | Non-conformity | Immediate Recommended action | Root Cause | Corrective Action to be taken (how do we stop it happening again) | Follow-up by | Update May 2019 |
| Issue 15 | ESP | 08.02.19 | D Wall E Oliff | System | System | | | | Facilities management operates its own environmental management system separate to the centralised system. Although an environmental system is being used by the Building Manager and their department, this system is not the system which is used by Environmental Services team or the Sustainability Officer. This system has been devised by Management of the Ark Business Centre and operates independently. It is located on a drive which not accessible to anyone other than Ark Business Centre Management. | Consideration as to how appropriate the current EMS is should be undertaken, and discussions with building managers should determine the best course of action to manage the environmental risks, opportunities and compliance obligations at each site. A brief guide on the requirements of such a system should be produced. | Centralised system not appropriate for localised operational requirements of site. | Though best practice would be to have a system accessible by both the sites and the Sustainability Officer, a separate system for storage of documents and active environmental management would be appropriate as long as the IT and physical documents meet the legal and other compliance requirements of CBC. | Oct 19 | Legislation Update System (LUS) to be used to store EMS documentation. All sites will have access. Training to be provided September 2019. |
| Issue 16 | ESP | 08.02.19 | D Wall E Oliff | Operational | Waste | Inability to fulfil compliance obligations | 4 | 1 | Waste segregation: recycling waste was found in the general waste bin in the outside bin area | Management at Ark Business are, in the opinion of the auditor, doing all they can to encourage tenants to segregate waste in the communal bins. | Lack of staff co-operation. | Though at the time of audit there was recyclable waste in the general waste, it is felt that Charnwood BC should continue with the level of education and communication with tenants which is currently in action. | Oct 19 | Being progressed |
| Issue 17 | ESP | 08.02.19 | D Wall E Oliff | Operational | Waste documentation | Inability to fulfil compliance obligations | 3 | 2 | Printer cartridges were being collected in the foyer in cardboard box. It was verbally confirmed that they were removed by a courier. No service agreement was available. | Carrier Air Handling should be contacted to obtain the f-gas competency of the last engineer to carry out f-gas inspections at site. | Lack of awareness that this was a requirement | The system which is used to store waste duty of care documentation should be easily accessible by all team members, and whenever waste leaves site, the duty of care documentation should be signed and obtained. | Oct 19 | Being progressed |
| Recommendation 14 | ESP | 08.02.19 | D Wall E Oliff | Operational | Energy | | | | Daylight sensors could reduce energy use in sunny areas of the building | | | | | Being progressed |

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|-------------------|----------------------------|----------------------|----------------------------|------------------------|----------------------|
| Likelihood | Very Likely (4) | 4 | 8 | 12 | 16 |
| | Likely (3) | 3 | 6 | 9 | 12 |
| | Unlikely (2) | 2 | 4 | 6 | 8 |
| | Remote (1) | 1 | 2 | 3 | 4 |
| | | Minor (1) | Significant (2) | Serious (3) | Major (4) |
| | | Impact | | | |

| OVERALL RISK RATING | |
|----------------------------|-----------------|
| 12 - 16 | HIGH |
| 6 - 9 | MODERATE |
| 3 - 4 | LOW |
| 1 - 2 | VERY LOW |