

AUDIT COMMITTEE - 19TH NOVEMBER 2019

Report of the Head of Planning and Regeneration Lead Member: Councillor Roy Rollings

Part A

ITEM 6 ENVIRONMENTAL AUDITS – REPORT ON OUTCOMES

Purpose of Report

The purpose of this report is to update the Committee on progress against actions identified in environmental audits undertaken for March 2019.

Recommendation

That the Committee notes the progress on actions identified from the environmental audit process.

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.

A climate change notice of motion was approved by Full Council on 24 June to note the findings from the International Panel on Climate Change report published in October 2018 (minute 23.1 19/20 refers). The report concluded that we have less than 12 years to act to avoid the worst impacts of climate change. The notice of motion set an aspiration for the council to achieve carbon neutrality from its own operations by 2030. The Council also committed to work with residents, businesses and other public bodies across the borough and region to deliver this ambitious goal through all relevant technologies, strategies and plans.

Audit Committee at its meeting on 11 June 2019, requested to receive an update to the November meeting in order to understand whether NCRs had been addressed (minute 56 19/20 refers).

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

Officer to contact:

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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. Following the request by Audit Committee at its meeting on 11 June 2019, follow-up environmental audits took place in October 2019 to check progress with implementing actions identified during the March 2019 audits. A training session for building managers on the Legislation Update Service also took place on 19th September 2019. Training covered managing mitigation actions through the Legislation Update Service which enables urgency of the action required, deadlines and management oversight to be coordinated.

Audit Findings

4. The audit process identifies 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.

5. Of the 14 outstanding NCRs, 10 have been resolved and 4 have programmes to ensure they are resolved in a timely manner. Of the 13 remaining Issues, 8 have been completed and 5 have programmes to ensure they are resolved in a timely manner. Of the 8 remaining Recommendations, all 8 have programmes to ensure they are considered in a timely manner.
6. Current progress on implementation of the audit findings are set out at Appendix A. A summary of the remaining outstanding Non-Conformance with Requirement (NCR) findings is presented below by site:

Charnwood Museum and Carillon Tower

7. There are two NCR's relating to Charnwood Museum. 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 8 and 9). Waste providers have been contacted to provide correct paperwork and following October audits will be contacted again to ensure paperwork is received.

Town Hall

8. 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 16). Due to supplier issues an assessment has now been booked for November 2019. This will be followed up at the April audits.

Ark Business Centre

9. 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 has been made to Severn Trent Water. Authorisation is awaited for a discharge consent to foul drainage. Future tenants will be made aware that this activity is not permitted on site. Additional control measures are being put in place with works ordered to install a French drain outside the two responsible units for discharges to a foul sewer rather than storm drain. Works are expected to be completed by end 2019. It is unknown when Severn Trent will be able to authorize the discharge consent. This will be followed-up at the April audits.

Monitoring

16. 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.

Appendices

Appendix A - Summary Results of Follow-up Environmental Audits

Appendix A

Summary Results of Follow-up Audits

Southfield Road Offices															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
NCR 2	08.02.19	Waste Documentation on 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 Shephed.</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	Discussions with waste providers have taken place. The appropriate SIC code will now be used on waste documentation.	Closed		
						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	Batteries are no longer collected at Southfield Road offices.	Closed		
Issue 1	08.02.19	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 is 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	Centralised system not appropriate for localised operational requirement 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	Oct 2019	Legislation Update System (LUS) to be used to store EMS documentation. All sites will have access. Training to be provided September 2019.	A training session was completed on 19 th September. All sites have access to online system. The system holds environmental management information on environmental aspects and impacts linking these to legislation and relevant actions required to	Closed		

Southfield Road Offices															
Issue	Date Raised	Area	Overall Risk Rating	Likeli hood	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	Update Oct 2019	Overall Risk Rating	Likeli hood	Impact
							compliance obligations at each site. A brief guide on requirements of such a system should be produced.		documents meet the legal and other compliance requirements of CBC.			ensure compliance.			
Issue 3	08.02.19	System				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 requirement 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	Batteries are no longer collected at Southfield Road offices.	Closed		

Woodgate Chambers															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
NCR 4	08.02.19	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. 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,	The Environment Agency has confirmed that an upper tier licence is not required due to the waste being owned by CBC.	Closed		

Charnwood Museum															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
NCR 7	08.02.19	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	Discussions with waste providers should be undertaken so that templates of notes have all the appropriate information on. If needed, CBC could create template of note to ensure compliance is achieved.	Oct 19	Being progressed	Discussions with waste providers have taken place. Documentation has been updated.	Closed		
NCR 8	08.02.19	Waste Documentation	Inability to fulfil compliance obligations	3	3	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 (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 template of a note to ensure compliance is achieved.	Oct 19	Being progressed	Initial has been contacted to provide correct paperwork. The correct SIC code has been identified. Awaiting documentation from waste providers. Following the October audit waste providers to be contacted again. To follow-up in April Audits.	6	3	3

Charnwood Museum															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
						General waste and mixed 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 template of a note to ensure compliance is achieved.	Oct 19	Being progressed	Veolia has been contacted to provide correct paperwork. The correct SIC code has been identified and paperwork updated.	Closed		
NCR 9	08.02.19	Waste Documentation	Inability to fulfil compliance obligations	4	3	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	The BID has been contacted to provide correct paperwork. Awaiting documentation from the BID. Following the October audit waste providers to be contacted again. To follow-up in April audits.	12	4	3
						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	Clear-a-Bee has been contacted to provide correct paperwork. Awaiting waste documentation from Clear-a-Bee. Following the October audit waste providers to be contacted again. To follow-up in April audits.	12	4	3

Charnwood Museum															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
NCR 11	08.02.19	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	Inspections are now in place twice yearly. Inspections have taken place in April and September 2019.	Closed		
NCR 12	08.02.19	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.	Oct 19	Check unit size. If under 12kw regulations do not apply.	The unit is under 12kw and therefore the regulations do not apply.	Closed		
Issue 6	08.02.19	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 such an eventuality happening 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	Recent fire inspection states area is no longer a fire risk (risk to life). Items on balcony are from the Carillon Tower. Awaiting outcome of lottery bid and completion of works at the carillon before items can be moved.			

Charnwood Museum															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
Issue 7	08.02.19	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 requirement 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.	A training session was completed on 19 th September. All sites have access to online system. The system holds environmental management information on environmental aspects and impacts linking these to legislation and relevant actions required to ensure compliance.	Closed		
Issue 8	08.02.19	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	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	A metal bin is in place to contain any spillages. Process being managed as part of catering contract.	Closed		

Charnwood Museum															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
							containment system.								
Recommendation 6	08.02.19	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	Tubes are stored securely in coffins. Due to a small volume collections exceed 12 months until coffins are full. Collections will be scheduled more frequently to ensure compliance.			
Recommendation 7	08.02.19	Energy				Investigation in to installation of de-stratification fans is recommended.	N/A	N/A	N/A	Oct 19	Being progressed	Possible energy saving option due to heat in the main area of the building rising to the ceiling requiring more energy to keep the area a comfortable temperature. The fans may re-circulate the hot air down to the lower levels, meaning less heating is required. This will be considered as part of energy efficiency audits.			

Charnwood Museum															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
Recommendation 8	08.02.19	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	Items on balcony are from the Carillon Tower. Awaiting outcome of lottery bid and completion of works at the Carillon before items can be moved.			

Town Hall															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
NCR 13	08.02.19	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.	Tins are now stored in a paint store	Closed		

Town Hall															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
NCR 14	08.02.19	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 84.11/0. There is no SIC code on the waste transfer note between Love Loughborough and CBC.	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 compliance is achieved.	Oct 19	Being progressed	Discussions with waste providers have taken place. The correct SIC code will be used on next transfer.	Closed		
NCR 15	08.02.19	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	COSHH sheets are now stored in a central point on the S Drive.	Closed		

Town Hall															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
NCR 16 	08.02.19	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	Delay in getting a TM44 inspection due to difficulty finding a supplier. Will be in place early November. To follow-up in April audits.	9	3	3
Issue 9 	08.02.19	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 requirement 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.	A training session was completed on 19 th September. All sites have access to an online system. The system holds environmental management information on environmental aspects and impacts linking these to legislation and relevant actions required to ensure compliance.	Closed		
Recommendation 9	08.02.19	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	All staff have been reminded through team briefings about the separation of waste.			

Town Hall															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
Recommendation 10	08.02.19	Energy				A lighting expert should be employed to determine a more energy efficient lighting solution for the foyer.				Oct 19	Being progressed	This will be considered as part of Carbon Neutrality site energy audits.			
Recommendation 11	08.02.19					F-Gas equipment should be properly labelled.				Oct 19	Being progressed	This will form part of TM44 inspection.			

Oak Business Centre															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
NCR 19	08.02.19	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,	The Environment Agency has confirmed an upper tier licence is not required due to waste being owned by CBC.	Closed		
NCR 20	08.02.19	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	CBC not responsible for this waste disposal. Tenant has been made aware paperwork must be kept.	Closed		
Issue 11	08.02.19	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	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	Oct 19	Legislation Update System (LUS) to be used to store EMS documentation. All sites will have access. Training to be provided September 2019.	Training provided 19 th September All sites have access to the online system.	Closed		

Oak Business Centre															
Issue	Date Raised	Area	Overall Risk Rating	Likeli hood	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	Update Oct 2019	Overall Risk Rating	Likeli hood	Impact
							risks, opportunities and compliance obligations at each site. A brief guide on the requirements of such a system should be produced.		appropriate as long as the IT and physical documents meet the legal and other compliance requirements of Charnwood BC.						
Issu e 12	08.02.19	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	Area is cleaned on an ongoing basis	4	4	1
Issu e 13	08.02.19	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	Tubes are stored in a secure area.	4	2	2
Issu e 14	08.02.19	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	Site is secured overnight. CCTV operational. Discussions with waste provider to take place to address action. To follow-up in April audits.	8	4	2

Oak Business Centre															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
Recommendation 13	08.02.19	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	To be considered as part of lighting efficiency upgrade programme			

Ark Business Centre															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
NCR 24	08.02.20	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 business if worked stopped immediately Cost for a site interceptor would require capital expenditure.	Application to discharge made to Severn Trent. Awaiting authorisation. Works have been ordered to install a French drain in front of the two units in question for discharge to go to foul sewer rather than storm drain.	9	3	3

Ark Business Centre															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
Issue 15	08.02.19	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.	A training session was completed on 19 th September. All sites have access to an online system. The system holds environmental management information on environmental aspects and impacts linking these to legislation and relevant actions required to ensure compliance.	Closed		
Issue 16	08.02.19	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 tenant 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	Ongoing work with tenants in place on waste segregation.	4	4	1

Ark Business Centre															
Issue	Date Raised	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	Update Oct 2019	Overall Risk Rating	Likelihood	Impact
Issue 17	08.02.19	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	Paperwork is now in place	Closed		
Recommendation 14	08.02.19	Energy				Daylight sensors could reduce energy use in sunny areas of the building					Being progressed	Motion sensors are in place.			

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