

AUDIT COMMITTEE - 9TH JUNE 2020

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

Part A

ITEM 9 ENVIRONMENTAL AUDITS – REPORT ON OUTCOMES

Purpose of Report

The purpose of this report is to update the Committee on the outcome of environmental audits undertaken for February 2020.

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 Climate Change Strategy was adopted by cabinet on 10th May 2018 and revised November 2019. The Climate Change Strategy provides the action plan for the Council to maintain and potentially improve its environmental performance.

A Climate Change 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 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.

A Carbon Neutral Plan setting out a pathway to achieve net zero carbon emissions for Council operations has been developed. The progression of the plan to Cabinet has been paused to take account of the current national health crisis and the implications of it on the Council's priorities and finances.

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 Legislation Update Service, Training, Raising Awareness, Internal audits
The Council fails to meet broader environmental objectives outlined within its policy	Unlikely (2)	Minor (1)	Very Low (2)	SLT 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 Leadership 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 the online Legislation Update Service on a monthly basis.

Environmental Audits

3. Environmental audits took place during February 2020 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 presentation on the outcome of audit findings and recommendations was provided remotely to building managers in April 2020 due to lockdown restrictions. The implementation of mitigation actions is managed through the Legislation Update Service which enables urgency of the action required, deadlines and management oversight to be coordinated.
5. Due to the disruption from the COVID-19 global health crisis causing closure of Council buildings and a change in national working practices there has been a delay in completing the final stages of the audit process and the closing meeting and a training session have had to be deferred.

Audit Findings

6. 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 recognises something which may later develop into an NCR or issue and needs addressing.

7. Overall there has been a rapid improvement in legal compliance showing a lot of hard work in managing environmental impacts at the Council. Findings have been less serious and Issues and NCRs have decreased overall (see Figure 1 – Appendix A). In 2019 there were 25 Non-Conformance with Requirement (NCRs) found but there has only been 5 found in 2020. There were 17 Issues found in 2019 with 9 found in 2020 and 14 Recommendations made in 2019 with only 5 made in 2020. There have been great efforts taken to ensure that the issue of trade effluent leaving the site is addressed. The Council are now fulfilling their compliance obligations to inform Severn Trent Water of the effluent. There is an exceptional level of waste duty of care knowledge in Building Services and evidence of good practice and attention to their legal requirements.
8. Of the 5 NCRs, 3 have been resolved and 2 have programmes in place to ensure they are resolved in a timely manner. Of the 9 Issues, 2 have been completed and 7 have programmes to ensure they are resolved in a timely manner. Of the 5 Recommendations, 5 are to be resolved in a timely manner.
9. The audit findings are set out at Appendix A. A summary of the Non-Conformance with Requirement (NCR) findings is presented below by site:

Charnwood Museum

10. There has been a noticeable effort to ensure that the museum storage areas are well kept and organised. The oil is now stored safely in secondary containment and the risk of spill is much reduced.
11. At the time of the audit there was no waste transfer note available for the Love Loughborough mixed recycling collection (NCR1) as this had not been provided by the Love Loughborough scheme despite it being requested. Lack of a waste transfer note indicates that the duty of care has not been followed, which could result in prosecution by the Environment Agency should the waste management practices of Charnwood Borough Council be investigated. Following the audit, a Waste Transfer Note has now been received from Love Loughborough.

12. There was no waste transfer note available for the Initial sanitary waste collection (NCR2) as Initial had not provided it, despite it being requested. This is likely due to drivers collecting the waste and not seeking out someone to sign the waste transfer note. Following the ~~audit~~audit, a Waste Transfer Note has now been received.
13. Mercury Recycling have not collected any waste since January 2019. As such, a number of the fluorescent tubes due to be collected will have been stored on site for over one year, which is beyond the limit for Waste exemption: Non Waste Framework Directive (NWFD) 2 temporary storage at the place of production (NCR3). Allowing waste to be stored on site for longer than the time specified in NWFD 2 waste exemption is in breach of the Environmental Permitting Regulations. Waste fluorescent tubes are not often removed as Mercury Recycling are paid per coffin. If a coffin is not full, it is not financially viable to remove it, thus waste is left on site for long periods of time. The audit states that there needs to be a tracking system such as stickers to ensure they are removed before a year is up. A collection has been made in March 2020 and a collection date scheduled internally to ensure it doesn't go beyond 12 months.
14. There was no Control of Substances Hazardous to Health (COSHH) information or Safety Data Sheet that could be found for two of the three COSHH chemicals sampled (NCR4). Not having information on the site as to the risk to the environment from substances means that if a pollution event were to occur involving those substances, the environmental risk may be greater than anticipated, and there may be a prosecution from a pollution event. Aside from environmental risk, this also poses a risk to human health. The audit states that there should be a process introduced by which the chemicals cupboard is sampled regularly to ensure that there are corresponding safety data sheets and COSHH risk assessments. This action is being progressed with all COSHH Material Safety Data Sheets and Risk Assessments reviewed and updated. There has been no print off yet due to building closure.

Ark Business Centre

15. There have been great efforts taken to ensure that the issue of trade effluent leaving the site is addressed. The Council are now fulfilling their compliance obligations to inform Severn Trent Water of the effluent.

Town Hall

16. There has been increased understanding and an effort made to ensure Ozone depleting substances management on site is fully compliant.
17. There is no supporting waste consignment note for the collections of hazardous gas by PHS Group (NCR5). Lack of a hazardous waste consignment note indicates that the Duty of Care has not been followed. The audit states that this needs to be investigated. PHS are producing waste consignment notes, because their unique codes are referenced on the quarterly return, but the Town Hall need to have a signed copy when it leaves site. The Town Hall are investigating the process taking place and raising staff awareness on the correct procedures.

Southfield Road Offices

18. There is an exceptional level of waste duty of care knowledge in Property Services and evidence of good practice and attention to their legal requirements.

Oak Business Centre and Woodgate Chambers

19. There were no site-specific findings at the Oak Business Centre and Woodgate Chambers.

Management Review

20. A Management Review with the Strategic Leadership Team has taken place in May to discuss audit findings and recommendations. The report was well received with the hard work by building managers to ensure compliance acknowledged. 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

21. 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 SLT and reported to Audit Committee.

Timetable

22. The timetable for the 2020 environmental audit cycle is shown in the table below.

Event	Description	Date
Environmental Compliance Audit	To review effectiveness of environmental management system	February 2020
SLT Briefing of outcome	To consider non-compliance and any mitigating actions	May 2020
Audit Committee	To receive a report on the outcome of environmental audits	June 2020
Environmental Audits – Follow-up	To review the progress being made by building managers	October 2020

Appendices

Appendix A - Summary Results of Follow-up Environmental Audits

Figure 1: Summary of Operational Audit Findings

	Non-Conformance		Issue		Recommendation		Overall number of findings	
	2019	2020	2019	2020	2019	2020	2019	2020
Museum	6	4 ↓	3	1	3	1	12	6
Ark Business Centre	4	0 ↓	3	1	1	0	8	1
Town Hall	4	1 ↓	2	5	3	4	9	10
Southfield Road	3	0 ↓	4	2	4	0	11	2
Woodgate Chambers	3	0 ↓	1	0	2	0	6	0
Oak Business Centre	5	0 ↓	4	0	2	0	11	1

Summary Results of Follow-up Audits

Charnwood Museum													
Issue	Raised by	Date Raised	Process Owner	Subject of Non-Conformity	Area	Overall Risk Rating	Likelihood	Impact	Non-conformity	Recommended action	Root Cause	Corrective Action to be taken (how do we stop it happening again)	Update June 2020
NCR 1	ESP	11.02.20	C Costelow	Inability to fulfil compliance obligations	Waste Documentation	6	2	3	No waste transfer note is available for the Love Loughborough mixed recycling collection as this has not been provided by the Love Loughborough scheme despite being requested.	Request a copy of Waste transfer notes as required	Lack of suitable internal procedures at Love Loughborough	Check documentation current at time of delivery	Closed Waste Transfer Note received
NCR 2	ESP	11.02.20	C Costelow	Inability to fulfil compliance obligations	Waste Documentation	6	2	3	No waste transfer note is available for the Initial sanitary waste collection as Initial have not provided it, despite being requested.	Request a copy of Waste transfer notes as required	This is likely due to drivers collecting the waste not seeking out someone to sign the waste transfer note	Take receipt of documentation at time of delivery	Closed Waste Transfer Note received
NCR 3	ESP	11.02.20	C Costelow	Legal	Waste	9	3	3	Mercury Recycling have not collected any waste since Jan 2019. As such, a number of the fluorescent tubes due to be collected will have been stored on site for over one year, which is beyond the limit for Waste exemption: NWF2 temporary storage at the place of production.	Arrange collection for tubes	If a coffin is not full, it is not financially viable to remove it, thus waste is left on site for long periods of time.	There needs to be a tracking system such as stickers to ensure they are removed before a year is up at all sites	Closed Collection made March 2020
NCR 4	ESP	11.02.20	C Costelow	Legal	Waste	6	3	2	No COSHH information or Safety Data Sheet could be found for two of the three COSHH chemicals sampled.	Update paperwork	Lack of control over new cleaning products introduced at site	There should be a process introduced by which the chemicals cupboard is sampled regularly to ensure that there are corresponding safety data sheets and COSHH risk assessments.	Being progressed – All COSHH MSDS Sheets and RA's have been reviewed and updated. Not printed off yet due to building closure Follow-up Oct 20

Charnwood Museum													
Issue	Raised by	Date Raised	Process Owner	Subject of Non-Conformity	Area	Overall Risk Rating	Likelihood	Impact	Non-conformity	Recommended action	Root Cause	Corrective Action to be taken (how do we stop it happening again)	Update June 2020
Issue 1	ESP	11.02.20	C Costelow	Legal	Waste Documentation				Both Clear-a-Bee waste transfer notes sampled did not include a SIC code		Lack of suitable internal procedures at Clear-a-bee	This must be addressed by Charnwood BC with Clear-a-Bee.	Closed Code written on Museum copy and a scanned copy sent to Clear-a-Bee
Recommendation 1	ESP	11.02.20	C Costelow	Operational	Waste				Not having information nearby on the site as to the risk to the environment from substances means that if a pollution event were to occur involving those substances, the environmental risk may be greater than anticipated, and there may be a prosecution from a pollution event. Aside from environmental risk, this also poses a risk to human health.	This suggestion ensures that the COSHH risk assessments are quickly available in case of an emergency.	Lack of filing system	The COSHH Assessments should be kept in the physical file with the Safety data sheets, as these will inform how to safely use the chemicals in the context of the Museum setting. This will also make spill response quicker and easier.	Being progressed Follow-up Oct 20

Charnwood Museum 2019 Audits													
Ref	Raised by	Date Raised	Process Owner	Subject of Non-Conformity	Area	Overall Risk Rating	Likelihood	Impact	Non-conformity	Recommended action	Root Cause	Corrective Action to be taken (how do we stop it happening again)	Update June 2020
NCR 8	ESP	08.02.19	C. Cosstelow	Inability to fulfil compliance obligations	Waste Documentation	9	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 CBC	Lack of clarity as to what the SIC code is used for on notes	Discussions with waste providers should be undertaken so that paperwork has the appropriate SIC code.	Closed Paperwork has been provided
NCR 9	ESP	08.02.19	C. Cosstelow	Inability to fulfil compliance obligations	Waste Documentation	12	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 members and should contain all duty of care waste documentation.	Closed Paperwork has been provided

Charnwood Museum 2019 Audits													
Ref	Raised by	Date Raised	Process Owner	Subject of Non-Conformity	Area	Overall Risk Rating	Likelihood	Impact	Non-conformity	Recommended action	Root Cause	Corrective Action to be taken (how do we stop it happening again)	Update June 2020
						9	3	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	Closed Paperwork has been provided
Issue 6	ESP	08.02.19	C. Cosstelow		Storage				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.	Items on balcony are from the Carillon Tower.	A more appropriate storage area needs to be found for such an eventuality happening again. This should be in an area away from visitors.	Awaiting outcome of lottery bid and completion of works at the Carillon before items can be moved. Follow-up Oct 20
Recommendation 6	ESP	08.02.19	C. Cosstelow		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.	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.	Lack of clarity and labelling	Tubes are stored securely in coffins. Due to a small volume collection exceeds 12 months until coffins are full. Schedule collections more frequently to ensure compliance.	Closed Collection has taken place March 2020 Future collection scheduled
Recommendation 7	ESP	08.02.19	C. Cosstelow	Energy	Energy saving				Investigation into installation of de-stratification fans is recommended.	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.			To be reviewed as part of carbon 2030 plan Follow-up Oct 20

Ark Business Centre													
Ref	Raised by	Date Raised	Process Owner	Subject of Non-Conformity	Area	Overall Risk Rating	Likelihood	Impact	Non-conformity	Recommended action	Root Cause	Corrective Action to be taken (how do we stop it happening again)	Update June 2020
Issue 2	ESP	11.02.20	Ian Cave	Risk Assessment	COSHH	4	2	2	Bactericidal Cleaner did not have a corresponding COSHH Risk Assessment.	A safety data sheet has been found for this chemical, and a COSHH Risk assessment should be formed from it.	It is thought that this is a new cleaning product which has recently been introduced	Carry out Risk Assessment when introducing new chemicals	Closed Risk Assessment complete

Ark Business Centre 2019 Audits													
Ref	Raised by	Date Raised	Process Owner	Subject of Non-Conformity	Area	Overall Risk Rating	Likelihood	Impact	Non-conformity	Recommended action	Root Cause	Corrective Action to be taken (how do we stop it happening again)	Update June 2020
NCR 24	ESP	02.19	Ian Cave	Inability to fulfil compliance obligations	Water	12	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	Obtain 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	Drain installed for discharge to go to foul sewer rather than storm drain.	Closed Application to discharge made to Severn Trent.
Issue 16	ESP	02.19	Dave Wall	Inability to fulfil compliance obligations	Waste	4	1	1	Waste segregation: recycling waste was found in the general waste bin in the outside bin area	Charnwood BC should continue with the level of education and communication with tenants which is currently in action.	Lack of tenant co-operation.	Ongoing work with tenants in place on waste segregation.	Closed
Recommendation 14	ESP	02.19	Dave Wall		Energy					Daylight sensors could reduce energy use in sunny areas of the building Motion sensors are in place.			To be reviewed as part of carbon plan Follow-up Oct 20

Town Hall													
Ref	Raised by	Date Raised	Process Owner	Subject of Non-Conformity	Area	Overall Risk Rating	Likelihood	Impact	Non-conformity	Recommended action	Root Cause	Corrective Action to be taken (how do we stop it happening again)	Update June 2020
NCR 5	ESP	12.02.20	K.Cutts	Legal	Waste Documentation	6	2	3	There is no supporting waste consignment note for the collections of hazardous gas by PHS Group.	Lack of a hazardous waste consignment note indicates that the duty of care has not been followed, which could result in prosecution by the Environment Agency should the waste management practices of Charnwood BC be investigated.	Lack of knowledge of this waste stream and its collection arrangements	This needs to be investigated. They are producing waste consignment <u>consignment</u> notes, because their unique <u>unique</u> codes are referenced on the quarterly return, but the Town Hall need to have a signed copy when it leaves site.	Being progressed Follow-up Oct 20
Issue 3	ESP	12.02.20	K Cutts	Legal	Waste documentation	4	2	2	The SIC code on the waste transfer note from Serco should be 84.11/0	Contact Serco to update documentation	Issue with Serco internal processes	This should be included as part of the ongoing dialogue with Serco. Suggest it is discussed with the issue raised in IG1.	Being progressed Follow-up Oct 20
Issue 4	ESP	12.02.20	K Cutts	Legal	Waste documentation	6	2	3	There is no valid waste carriers licence listed on the Love Loughborough waste transfer note.	Contact Love Loughborough <u>Loughborough</u> to update documentation	Issue with Love Loughborough internal processes	This waste carriers licence appears to be an old format one, so they need to be informed that it is no longer valid.	Being progressed Follow-up Oct 20
Issue 5	ESP	12.02.20	K Cutts	Legal	Waste documentation	6	2	3	The PHS Group waste transfer note covers a period in the future.	Contact PHS to update documentation	Misreading of waste transfer note or possibly a typing error	This does not cover the current collection period. This is not a problem if there will be no collections until this period. There may be a more recent one on file though.	Being progressed Follow-up Oct 20
Issue 6	ESP	12.02.20	K Cutts	Legal	Waste documentation	4	2	2	The PHS Group waste transfer note lists the SIC code as 56.10/1 – Licensed restaurants. This code should be 84.11/0.	Contact PHS to update documentation	Issue with PHS internal processes	They need to be informed that this isn't correct	Being progressed Follow-up Oct 20

Town Hall													
Ref	Raised by	Date Raised	Process Owner	Subject of Non-Conformity	Area	Overall Risk Rating	Likelihood	Impact	Non-conformity	Recommended action	Root Cause	Corrective Action to be taken (how do we stop it happening again)	Update June 2020
Issue 7	ESP	12.02.20	K Cutts	Legal	Waste documentation	4	2	2	A COSHH Risk Assessment could not be seen for the Wellbilt Antifreeze.	Determine Risk Assessment	Not known, but this may have been brought in from home or purchased by a member of staff without informing the building manager, thus it is uncontrolled	As well as producing a relevant COSHH Risk assessment, it should be determined who purchased it and what it is used for to understand the risk.	Being progressed Follow-up Oct 20
Recommendation 2	ESP	12.02.20	K Cutts	Operational	COSHH				The Safety Data Sheet for the Lemon Hard Surface Cleaner and the COSHH RA updated accordingly not available	The Safety Data Sheet for the Lemon Hard Surface Cleaner (the new product) is acquired and the COSHH RA updated accordingly	Not updating COSHH register	It is likely that the two products have the same ingredients but this must be assessed. Staff should make Kevin aware when they bring in a new product or order a different brand.	Being progressed Follow-up Oct 20
Recommendation 3	ESP	12.02.20	K Cutts	Operational	Waste				Cooking oil left in kitchen	It is recommended that the contractors who left the oil arrange for the oil to be collected at their own cost.	The Town Hall did not create the waste so as the waste producer, the contractor has duty of care to remove the waste.	Check waste disposal requirements before contractors leave site	Being progressed Follow-up Oct 20
Recommendation 4	ESP	12.02.20	K Cutts	Operational	F Gas				Andy Davies' competency should be obtained and kept on file Failure to have the correct gas refilled into the equipment poses a risk to the environment, as the Montreal Protocol has stated that gases with a high GWP should be phased out. This is the responsibility of the	Next time he visits, ask if he can provide his competency certificates for your records.	Not updating records	Ensure competency certificates are held on file	To be progressed Follow-up Oct 20

Town Hall													
Ref	Raised by	Date Raised	Process Owner	Subject of Non-Conformity	Area	Overall Risk Rating	Likelihood	Impact	Non-conformity	Recommended action	Root Cause	Corrective Action to be taken (how do we stop it happening again)	Update June 2020
									engineer but Charnwood BC should take action to avoid an environmental risk.				
Reco mme ndati on 5	ESP	12.02.20	K Cutts	Operational	F Gas				It must be noted that the next time the gas is refilled in the AHU, it must be refilled either with a smaller amount of gas, or with a different gas which has a lower global warming potential.	This should be discussed with Carrier as soon as possible, and before the next leak check. If you need to add refrigerant to a system affected by the refill ban after 2020, you will need to follow guidelines.	Unknown requirement		Being progressed Follow-up Oct 20

Town Hall 2019 Audit													
Ref	Raised by	Date Raised	Process Owner	Subject of Non-Conformity	Area	Overall Risk Rating	Likelihood	Impact	Non-conformity	Recommended action	Root Cause	Corrective Action to be taken (how do we stop it happening again)	Update June 2020
NCR 16	ESP	08.12.19	Kevin Cutts	Inability to fulfil compliance obligations	AHU	9	3	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.	Delay in getting a TM44 inspection due to difficulty finding a supplier. To follow-up Oct 20 audits
Reco mme ndati on 9	ESP	08.12.19	Kevin Cutts		Waste				Waste in yard is mixed together and kept in a disorganised fashion.	Waste stored in the yard should be tidied and segregated properly.		Segregation of yard sections is recommended.	Closed Site has been cleared and kept tidy
Reco mme ndati on 10	ESP	08.12.19	Kevin Cutts		Energy				Lighting in foyer is not the most energy efficient	A lighting expert should be employed to determine a more energy efficient lighting solution for the foyer.		Upgrade lighting to provide energy and cost savings	Closed Property Services are investigating lighting requirements

Town Hall 2019 Audit													
Ref	Raised by	Date Raised	Process Owner	Subject of Non-Conformity	Area	Overall Risk Rating	Likelihood	Impact	Non-conformity	Recommended action	Root Cause	Corrective Action to be taken (how do we stop it happening again)	Update June 2020
Recommendation 11	ESP	08.12.19	Kevin Cutts		F Gas				F-Gas equipment should be properly labelled.	This will form part of TM44 inspection.		Label equipment as required	To follow-up Oct 20 audits

Southfield Road Offices													
Ref	Raised by	Date Raised	Process Owner	Subject of Non-Conformity	Area	Overall Risk Rating	Likelihood	Impact	Non-conformity	Recommended action	Root Cause	Corrective Action to be taken (how do we stop it happening again)	Update June 2020
Issue 8	ESP	02.20	D Wall	Duty of Care	Waste	6	2	3	<p>There is no waste carriers licence on the transfer note from Shredpro.</p> <p>Lack of a waste carriers' licence on the waste transfer note indicates that the duty of care has not been followed, which could result in prosecution by the Environment Agency should the waste management practices of Charnwood BC be investigated.</p>	Contact ShedPro	Poor internal procedures at ShredPro	Check documentation	<p>Being progressed</p> <p>To follow-up Oct 20 audits</p>
Issue 9	ESP	02.20	D Wall	Risk Assessment	COSHH	4	2	2	<p>A COSHH Risk Assessment was not available for the W2 washroom thick bleach</p> <p>Not having information on the site as to the risk to the environment from substances means that if a pollution event were to occur involving those substances, the environmental risk may be greater than anticipated, and there may be a prosecution from a pollution event. Aside from environmental risk, this also poses a risk to human health.</p>	The Safety Data Sheet is present, so a COSHH Risk Assessment should be developed from this.	Risk assessment not available	Ensure risk assessments completed when using new products	Closed

Oak Business Centre 2019 Audits														
Ref	Raised by	Date Raised	Process Owner	Subject of Non-Conformity	Area	Overall Risk Rating		Likelihood	Impact	Non-conformity	Recommended action	Root Cause	Corrective Action to be taken (how do we stop it happening again)	Update June 2020
Issue 12	ESP	08.02.19	D Wall E Oliff	Operational	Waste	8	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.	Closed	
Issue 13	ESP	08.02.19	D Wall E Oliff	Operational	Waste	8	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.	Closed	
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.	Closed Padlock on gate	
Recommendation 13	ESP	08.02.19	D Wall	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			Review as part of carbon plan Follow up Oct 20 audits	

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