

AUDIT COMMITTEE - 8TH JUNE 2021

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

Part A

ITEM 11 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 March 2021.

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 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 is being developed. The plan is scheduled to be taken to Cabinet 12 August 2021.

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 4 March 2021 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 to building managers on 25th March 2021. 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 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.

6. Overall the management of the Environmental Systems is of a good standard despite 2020/2021 being a challenging year. The integrity of the system is being upheld by processes that have been maintained and where possible improved. In 2021 there were 6 Non-Conformance with Requirement (NCRs) found and 5 found in 2020. There were 14 Issues found in 2021 with 9 found in 2020 and 6 Recommendations made in 2021 with 5 made in 2020. Positive improvements were seen in relation to the maintenance of COSHH records and their availability at all locations. Incorrect waste documentation was the main operational audit finding.
7. Of the 6 NCRs, 1 has been resolved and 5 have programmes in place to ensure they are resolved in a timely manner. Of the 14 Issues, 9 have been completed and 5 have programmes to ensure they are resolved in a timely manner. Of the 6 Recommendations, 1 has been completed, 5 are to be resolved in a timely manner.
8. 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

9. The standard of housekeeping was found to be high, with chemicals being stored in the correct location and without waste being stored in incorrect locations. A positive observation was raised on visitor environmental impact being considered and actions taken to educate them on environmental issues.
10. It should be noted that due to the ongoing Covid 19 Pandemic there has been a significantly shorter period of time where visitors are on site and limited attendance on site by staff.
11. Over the past 12 months, the main interaction with the EMS is by working towards the Carbon Management Plan. This has been by using public transport when possible and when not working from home. There has also been a push to educating visitors on environmental issues, this could lead to their own environmental improvements. These have been carried out on site and online when visitors have not been allowed due to restrictions.
12. A waste transfer note for the Serco mixed recycling collection (NCR1) has been incorrectly completed. An incorrect 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.

13. There was no waste transfer note (NCR2) for sanitary waste available for the Initial sanitary waste collection. This has now been resolved.

Ark Business Centre

14. Housekeeping was of a good standard, and storage areas inside and outside were well maintained. The LUS system is being well utilised and the auditees have been using the system to log actions against relevant aspects, impacts and compliance obligations as discussed at the training session previously.

15. A waste transfer note for toner cartridges dated 26/10/20 from Infotone Imaging Supplies Limited was filled out incorrectly (NCR3). It should be ensured that the printer cartridge waste transfer note includes the correct SIC code, carriers licence number and signature of the producer.

Town Hall

16. Housekeeping was found to be good throughout the premises with chemicals being stored in the correct locations such as cleaning cupboards. The site has continued to interact with the EMS on a very practical basis although the amount of improvements to the building that have been carried out in the last 12 months has been limited mostly to improving decorating. There have also been issues with gaining approval for improvements due to the short payback time requirements. A positive observation was raised of a proactive approach to reducing the amount of energy used while building occupancy levels are lower.

17. The phs Group waste transfer note is dated 01/10/2019 to the 30/09/2020. This transfer note has not been completed correctly (NCR4). It must be ensured that there is an up to date and correctly completed waste transfer note for sanitary waste.

Southfield Road Offices

18. Housekeeping at site was of a very good standard with waste being stored in the correct locations. The LUS system is being well utilised and the auditees have been using the system to log actions against relevant aspects, impacts and compliance obligations as discussed at the training session previously. They have dedicated time and effort to integrate the LUS system with their current working processes. A positive observation was raised in that good practise is being shown through the retention of NHS waste documentation.

Oak Business Centre

19. The housekeeping at Oak Business Centre was found to be very high. However, a minimal amount of shredded paper waste was found near the bins that are mostly used by the tenants.

20. There are no waste transfer notes for printer cartridges transferred from Oak (NCR5). There needs to be a transfer note for printer cartridges.

Woodgate Chambers

21. Though a limited area, housekeeping was of an acceptable standard, though within the waste storage area outside, there was a little waste overflowing from the containers. The LUS system is being well utilised and the auditees have been using the system to log actions against relevant aspects, impacts and compliance obligations as discussed at the training session previously. They have dedicated time and effort to integrate the LUS system with their current working processes.

General

22. There was a lack of evidence to support compliance with Heat Regulations (NCR 6). It needs to be ensured that the Heat Network Regulations are complied with where there is communal heating or the distribution of thermal energy in the form of steam, hot water or chilled liquids from a central source. A briefing on the Heat Network Regulations was held on 27th April with a briefing note prepared for building managers. A workbook is to be developed to allow the Council to understand the networks in place and into which classification they fall. A detailed analysis of any heat networks identified will be completed using the government cost effectiveness analysis tool.

Management Review

23. A Management Review with the Strategic Leadership Team was held on 19th May 2021 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

24. 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

25. The timetable for the 2021 environmental audit cycle is shown in the table below.

Event	Description	Date
Environmental Compliance Audit	To review effectiveness of environmental management system	March 2021
SLT Briefing of outcome	To consider non-compliance and any mitigating actions	May 2021
Audit Committee	To receive a report on the outcome of environmental audits	June 2021

Environmental Audits – Follow-up	To review the progress being made by building managers	October 2021
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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	
	2020	2021	2020	2021	2020	2021	2020	2021
Museum	4	2	1	2	1	3	6	7
Ark Business Centre	0	1	1	1	0	0	1	2
Town Hall	1	1	5	3	4	0	10	4
Southfield Road	0	1	2	4	0	3	2	8
Woodgate Chambers	0	0	0	4	0	0	0	4
Oak Business Centre	0	0	0	0	0	0	1	0
General	0	1	2	0	3	0	3	1

Summary Results of Internal Audits – March 2021

Charnwood Museum 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
NCR1	4 th March 2021	Museum Manager	The mixed recycling waste transfer note Serco/ Love Loughborough, does not contain: 1) Charnwood Borough Council SIC code 2) The correct Serco Waste Carriers License registration number 3) Signature by Serco	Lack of a correct 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.	6	2	3	Incorrect paperwork from the supplier	Contact the supplier by letter explaining how the waste transfer note should appear.	Briefing note written & sent to building managers to send to supplier
NCR2	4 th March 2021	Museum Manager	No waste transfer note for sanitary waste is available for the Initial sanitary waste collection.	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 BC be investigated.	6	2	3	No Waste Transfer Note available from Initial	Obtain the note for 2021	Closed 13/05/21 Waste transfer note in place
Issue 1	4 th March 2021	Museum Manager	The operators of the café should be informed that the cooking should be stored on secondary containment and suggested that they purchase a spill kit and train on its use.	The waste oil is not being stored correctly the waste producers are not taking responsibility for their waste. There is a risk to environment of oil leaking for which the consequence would be a financial loss.	2	2	1	Insufficient waste control by tenant.	Explain the issue with the tenant and request them to resolve the issue.	In progress
Issue 2	4 th March 2021	Museum Manager	The SIC code used on the consignment note is incorrect as it should be 84.11 for General public administration activities	Lack of a correct waste transfer note indicates that the duty of care has not been followed, which could result in prosecution by the	6	2	3	Incorrect paperwork from the supplier	Contact the supplier by letter explaining how the waste transfer note should appear.	Briefing note written & sent to building managers to send to supplier

Charnwood Museum 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
				Environment Agency should the waste management practices of Charnwood BC be investigated.						
Rec 1	4 th March 2021	Museum Manager	The waste transfer note for mixed recycling specifies that aerosols can be transferred with the waste. This is incorrect as aerosols should be consigned separately. The aerosol reference should be removed from the waste transfer note.	An incorrect 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.	6	2	3	The paperwork provided seemed to incorrectly advise that the waste could be disposed of in this recycling stream	Contact the supplier by requesting a separate aerosol collection and waste transfer note.	In progress
Rec 2	4 th March 2021	Museum Manager	To ensure that the competency certificate for the engineer who carried out the air conditioning maintenance is stored in the museum folder.	Not having the competency of the engineer who undertakes the maintenance is not compliant with the O-zone Depleting Substances Regulations and could lead to prosecution if the f-gas maintenance records were ever to be investigated by the Environment Agency.	2	1	2	Supplier lack of compliance in providing engineers records.	Contact the supplier and request a copy of the engineer's certificate/competence.	In progress
Rec 3	4 th March 2021	Museum Manager	To consider installing PIR sensors and LED lighting in staff areas.	The use of electricity is linked to climate change, therefore energy saving measures should be adopted where possible	6	2	3	Due to the pandemic and lower building utilisation it does not appear that energy saving lighting measures have been reviewed	Review costings	To be reviewed as part of the 2030 Carbon Neutral Plan

Charnwood Museum 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
								for the staff areas.		

Charnwood Museum 2020 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
NCR4	11 Feb 2020	Museum Manager	No COSHH information or Safety Data Sheet could be found for two of the three COSHH chemicals sampled.	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.	6	3	2	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.	Closed COSHH was available at the 4/03/2021 audit
Rec 1	11 Feb 2020	Museum Manager	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.	Closed COSHH was available at the 4/03/2021 audit

Charnwood Museum 2019 Audit

Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
Issue 6	08 Feb 2019	Museum Manager	NCR Previously raised about the equipment on the balcony has not been resolved after 6 months.					Items on balcony are from the Carillon Tower	No immediate action can be taken but ensure sources of ignition are placed away from the items	<p>Closed 18/05/21</p> <p>There are still some items in storage on the balcony, however it has been significantly reduced since 2020.</p> <p>The Carillon Trust have ben sorting out items and transferring what they can to their storage on New Street.</p> <p>An external Fire Risk Assessment is due Summer 2021.</p>
Rec 7	08 Feb 2019	Museum Manager	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.	The use of electricity is linked to climate change, therefore energy saving measures should be adopted where possible	6	2	3	Due to the pandemic and lower building utilisation it does not appear that energy saving lighting measures have been reviewed for the staff areas.	Investigation into installation of de-stratification fans is recommended	To be reviewed as part of carbon 2030 plan

Ark Business Centre 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
NCR 3	4 th March 2021	Building Manager	To ensure that the printer cartridge waste transfer note includes: Correct SIC code Carriers licence number Signature of the producer	Lack of a correct 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.	6	2	3	Infotone did not supply a correct WTN	Supplier to be contacted to obtain correct waste transfer note	In progress
Issue 3	4 th March 2021	Building Manager	The Display Energy Certificate should be A3 in size.	A local authority can issue a penalty charge notice of £500 for failing to display a DEC				Misinterpretation of the guidance regarding display size	Display certificate amended to A3 size	Closed 25/03/21 Certificate amended

Ark Business Centre 2019 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
Rec	08 Feb 2019	Building Manager	Possible energy saving option due to daylight sensors reducing energy use in sunny areas of the building Motion sensors are in place.	The use of electricity is linked to climate change, therefore energy saving measures should be adopted where possible	6	2	3	Due to the pandemic and lower building utilisation it does not appear that energy saving lighting measures have been reviewed for the staff areas.	Investigation into daylight sensors is recommended	To be reviewed as part of carbon 2030 plan

Town Hall 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
NCR 4	4 th March 2021	Town Hall Technical Manager	No waste transfer note for sanitary waste is available for the Initial sanitary waste collection.	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 BC be investigated.	6	2	3	PHS last visit to site was within the date range of the WTN. A new supplier is being sourced for reopening	Advise date of last collection and who new supplier is and when they were engaged. 17/03/2020. Previous note ran from 01/10/2019 to 30/09/2020. Engage a new supplier.	In progress
Issue 4	4 th March 2021	Town Hall Technical Manager	To complete the waste transfer note for general waste from the Town Hall	An incorrectly completed 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.	6	2	3	Incorrectly completed by CBC	Ensure all sections are completed correctly	To be progressed
Issue 5	4 th March 2021	Town Hall Technical Manager	To ensure that the waste transfer note from Love Loughborough is signed by Serco.	An incorrectly completed 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.	6	2	3	Incorrectly completed by Serco	Ensure all sections are completed correctly Refer to supplier briefing note	To be progressed
Issue 6	4 th March 2021	Town Hall Technical Manager	There is no evidence of the engineers (Ian Simpkins) competence to conduct the testing of the air conditioning unit.	Not having the competency of the engineer who undertakes the maintenance is not compliant with the O-zone Depleting	2	1	2	Not supplied by service company	Obtain certificate	To be progressed

Town Hall 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
				Substances Regulations and could lead to prosecution if the f-gas maintenance records were ever to be investigated by the Environment Agency.						
Issue 7	4 th March 2021	Town Hall Technical Manager	The Display Energy Certificate should be A3 in size.	A local authority can issue a penalty charge notice of £500 for failing to display a DEC at all times in a prominent place clearly visible to the public	2	2	1	Misinterpretation of the guidance.	Display A3 size certificate	Closed 25/03/21 Certificate amended and on display
Rec 4	4 th March 2021	Town Hall Technical Manager	To consider reviewing the payback time requirement for energy improvements.	The use of electricity is linked to climate change, therefore energy saving measures should be adopted where possible	6	2	3	Allocation of finances	Establish if a review of the payback requirements for introducing energy saving measures can be carried out.	To be progressed
Rec 5	4 th March 2021	Town Hall Technical Manager	The mixed recycling waste transfer note specifies that aerosols can be transferred with the waste. This is incorrect. Aerosols should be consigned separately. The aerosol reference should be removed from the waste transfer note.	An incorrect 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.	6	2	3	Waste provider not providing the correct paperwork/service	Arrange for a separate collection for aerosols	To be progressed

Town Hall 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
Rec 6	4 th March 2021	Town Hall Technical Manager	To increase signage for the spill kit location so they can be easily found	To prevent pollution in the event of a spill	2	1	2	Lack of obvious identification of spill materials	Signage required on the door and inside the upstairs lift room telling people where the spill kit is located	Closed 23/05/21 Signage in place

Town Hall 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
Positive Observation	4 th March 2021	Town Hall Technical Manager	There has been a proactive approach to reducing the amount of energy used while building occupancy levels are lower							

Town Hall 2020 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
NCR5	12 Feb 2020	Town Hall Technical Manager	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.	6	2	3	Lack of knowledge of this waste stream and its collection arrangements	This needs to be investigated. They 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.	Closed 24/09/2020 A compliant hazardous waste consignment note for a collection in July 2020 was evidenced

Town Hall 2020 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
Issue 3	12 Feb 2020	Town Hall Technical Manager	The SIC code on the waste transfer note from Serco should be 84.11/0	A SIC code indicates the process by which the waste arose, and informs those receiving the waste of the potential environmental risk of the waste. Lack of a SIC code 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.	4	2	2	Issue with Serco internal processes	This should be included as part of the ongoing dialogue with Serco.	Closed 24/09/2020 The correct SIC code was seen on the waste transfer note – the note was only dated 2020-2021.
Issue 4	12 Feb 2020	Town Hall Technical Manager	There is no valid waste carriers licence listed on the Love Loughborough waste transfer note.	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.	6	2	3	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.	Closed 24/09/2020 The waste carriers licence was up to date on the note covering 01.05.2020 to 30.04.2021
Issue 5	12 Feb 2020	Town Hall Technical Manager	The phs Group waste transfer note covers a period in the future.	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 BC be investigated.	6	2	3	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.	Closed 24/09/2020 A note covering the current year has now been provided.

Town Hall 2020 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
Issue 6	12 Feb 2020	Town Hall Technical Manager	The phs Group waste transfer note lists the SIC code as 56.10/1 – Licensed restaurants. This code should be 84.11/0. On note 01/10/2019 to the 30/09/2020	A SIC code indicates the process by which the waste arose and informs those receiving the waste of the potential environmental risk of the waste. Lack of a SIC code 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.	4	2	2	Issue with phs internal processes	They need to be informed that this isn't correct	Closed 16/02/21 The SIC code is now correct
Issue 7	12 Feb 2020	Town Hall Technical Manager	A COSHH Risk Assessment could not be seen for the Wellbilt Antifreeze.	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.	4	2	2	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.	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.	Closed 10/03/2021 A COSHH assessment has been provided for the antifreeze.
Rec 2	12 Feb 2020	Town Hall Technical Manager	The Safety Data Sheet for the Lemon Hard Surface Cleaner (the new product) not available and the COSHH risk assessment not updated accordingly	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	2	2	1	It is likely that the two products have the same ingredients but this must be assessed. Staff should make Kevin aware	The Safety Data Sheet for the Lemon Hard Surface Cleaner (the new product) is acquired and the COSHH RA updated accordingly	Closed 24/09/2020 This has been completed

Town Hall 2020 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
				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.				when they bring in a new product or order a different brand.		
Rec 3	12 Feb 2020	Town Hall Technical Manager	It is recommended that the contractors who left the oil arrange for the oil to be collected at their own cost.	The waste oil is not being stored correctly and by being left in the fryer, the waste producers are not taking responsibility for their waste. There is a risk to environment of oil leaking for which the consequence would be a financial loss.	2	2	1	The contractor is not observing their legal obligation.	Charnwood BC did not create the waste so as the waste producer, the contractor has duty of care to remove the waste.	Closed 17/05/2021 There was no waste oil observed during March 2021 audit
Rec 4	12 Feb 2020	Town Hall Technical Manager	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 engineer but Charnwood BC should take action to avoid an environmental risk.	Not having the competency of the engineer who undertakes the maintenance is not compliant with the Ozone Depleting Substances Regulations and could lead to prosecution if the f-gas maintenance records were ever to be investigated by the Environment Agency.	2	1	2	Incompetency on the part of the service company	Next time he visits, ask if he can provide his competency certificates for your records.	The engineer has changed to Neil Atter and no competencies of any engineers have been kept on file.

Town Hall 2020 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
Rec 5	12 Feb 2020	Town Hall Technical Manager	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.	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 engineer but Charnwood BC should take action to avoid an environmental risk.	2	1	2	It is thought that the service company may not be aware that the refrigerant used originally is now banned.	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.	Discuss with carrier when refilling is required 2021

Town Hall 2019 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
NCR 16	8 th Dec 2019	Town Hall Technical Manager	There is no TM44 in place for the air handling units used at site, which contain a refrigerant.	Inability to fulfil compliance obligations	9	3	3	Lack of awareness that this was a requirement	A TM44 inspection should be booked immediately.	Closed 24/09/20 A TM44 inspection was undertaken on 29.11.19 by Low Energy Consultancy Ltd. This report gave detailed findings of the air handling units and refrigerants at site and made recommendations for vent cleaning and the replacement of fridges.

Town Hall 2019 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
Rec 11	8 th Dec 2019	Town Hall Technical Manager	F-Gas equipment should be properly labelled.	Inability to fulfil compliance obligations	2	1	2	This will form part of TM44 inspection.	Label equipment as required	Closed 24/09/20 Further investigation has identified that it is the manufacturers responsibility to label the equipment and that there is no requirement to retrospectively label the equipment.

Southfield Road Offices 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
Issue 8	4 th March 2021	Building Manager	The General Waste and Mixed Recycling waste transfer note for 1/11/2020 to 31/10/21 needs fully completing in section B 1 and 2.	An incorrectly completed 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.	6	2	3	Not completed by CBC	Complete section B 1 and 2 in future.	Closed 25/03/21 Completed waste transfer note provided

Southfield Road Offices 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
Issue 9	4 th March 2021	Building Manager	The confidential waste transfer note needs to be signed by the producer. WO:159926	An incorrectly completed 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.	6	2	3	Not completed by CBC	Please ensure notes are signed when this is permitted following Covid guidelines. Review process next audit.	Closed 25/03/21 All documents are completed on a tablet by the Shredpro operator. Normally this would be signed off by the Facilities staff, however, to comply with Covid secure operations not physically signing the tablet to avoid any cross contamination. The date of the collection was 28/01/2021
Issue 10	4 th March 2021	Building Manager	It needs to be ensured that the bund for the backup generator will hold at least 492.8L in its own right.	Risk of Pollution. For oil tanks, Intermediate bulk container's and mobile bowsers, the secondary containment system must be able to hold at least 110 per cent of the maximum volume of a single container.	8	2	4	Bund capacity needed to be verified as compliant.	Regular / monthly checks to the integrity of the bund.	Closed 25/03/21 Bund size is 96cm wide x 245cm long x 37cm deep = 870240cm ³ /2 This equates to a bund capacity of 870ltrs, diesel tank size is 492ltrs The generator is started and checked every week this includes Diesel and oil

Southfield Road Offices 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
										levels including the bund. Records are kept.
Issue 11	4 th March 2021	Building Manager	There is no evidence of the engineers (Nick Wright) competence to conduct the testing of the air conditioning unit.	Not having the competency of the engineer who undertakes the maintenance is not compliant with the O-zone Depleting Substances Regulations and could lead to prosecution if the f-gas maintenance records were ever to be investigated by the Environment Agency.	2	1	2	Record for Nicholas Wright F gas Cert was not available at the time of the audit.	Retain records of engineer competence	Closed 25/03/21 Supplied 22/03/2021
Positive Observation			Good practise is being shown through the retention of NHS waste documentation.							

Southfield Road Office 2020 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
Issue 8	8 th Feb 2020	Building Manager	There is no waste carriers licence on the transfer note from Shredpro.	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	6	2	3	Poor internal procedures at ShredPro	Contact ShredPro to obtain correct documentation	Closed 24/09/20

Southfield Road Office 2020 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
				Charnwood BC be investigated.						

Oak Business Centre 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
NCR 5	4 th March 2021	Building Manager	There needs to be a transfer note for printer cartridges, for Infotone	Lack of a correct 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.	6	2	3	Infotone did not supply a correct WTN	Contact Infotone to update waste transfer note	Waste transfer note manually updated. Infotone contacted to supply original copy on 04/02/2021. Awaiting new note from Infotone
Issue 12	4 th March 2021	Building Manager	The shredded paper waste on the car park near the bins needs to be put inside the bins.	There is a risk of pollution from the activities of tenants, that is not addressed could become a pollution issue.	2	2	1	Tenants incorrect waste disposal.	Put shredded paper on the floor in the bin	Closed 25/03/21 Shredded paper placed in the bin Tenants' sent a reminder regarding waste disposal on 23/03/2021. Review next audit.

Oak Business Centre 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
Issue 13	4 th March 2021	Building Manager	It needs to be ensured that the general and mixed recycling transfer note has section B completed.	An incorrectly completed 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.	6	2	3	Incorrectly completed by CBC.	Ensure all sections are completed correctly	Closed 25/03/21
Issue 14	4 th March 2021	Building Manager	The Display Energy Certificate should be A3 in size.	A local authority can issue a penalty charge notice of £500 for failing to display a DEC at all times in a prominent place clearly visible to the public.	2	2	1	Misinterpretation of the regulation.	Amend to A3	Closed 25/03/21

Oak Business Centre 2019 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
Rec 13	8 th Feb 2019	Business Centre Manager	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	The use of electricity is linked to climate change, therefore energy saving measures should be adopted where possible	6	2	3	Due to the pandemic and lower building utilisation it does not appear that energy saving lighting measures have been reviewed for the staff areas.	Investigation into photocells is recommended	To be reviewed as part of carbon 2030 plan

General Legal Compliance March 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update May 2021
NCR 6	4 th March 2021	Building Manager	It needs to be ensured that the Heat Network Regulations are complied with where there is communal heating or the distribution of thermal energy in the form of steam, hot water or chilled liquids from a central source.	Office for Product Safety and Standards is the regulator, non-compliance with obligated regulations could lead to prosecution.	6	2	3	Lack of evidence to support compliance with Heat Regulations	Carry out an assessment of the regulations and establish records to prove the accurate compliance status	Under investigation Briefing Note and presentation to Building Managers

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