

AUDIT COMMITTEE - 16TH NOVEMBER 2021

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 the outcome of environmental audits undertaken for October 2021.

Recommendations

1. That the Committee notes the outcome of the environmental audit process, including the identified actions for any mitigation required.
2. That the Committee notes the proposed reduction in the frequency of internal environmental audits to every 12 months.

Reasons

1. To ensure the Committee is kept informed of the Council's approach to managing environmental risks related to the Environmental Management System.
2. Based on the relative environmental risks of the sites, it is considered auditing each site every six months is unnecessary. Most of the paperwork and statutory inspections require renewal every 12 months. This means that the same paperwork is reviewed at both the full and interim audits. Over time compliance has increased and processes improved.

Policy Justification and Previous Decisions

The Council has an in-house Environmental Management System to manage legal compliance with environmental regulations and environmental impact arising from its activities and operations. The Council's Corporate Strategy (2020-24) sets a commitment to looking after the environment for future generations and the Council has adopted a Climate Change Strategy, a Carbon Neutral Plan and an Open 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 www.charnwood.gov.uk/environmental_management. The Policy was adopted by Cabinet in October 2015 (minute 61 15/16 refers) and refreshed in February 2021. It establishes a framework for setting objectives and targets for environmental improvement. A Climate Change Strategy was adopted by Cabinet on 10th May 2018 (minute 133 18/19 refers) 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 adopted by Cabinet at its meeting on 16th September 2021 (minute 27 21/22 refers). A communications plan and launch are being prepared for January 2022.

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

Risk Identified	Likelihood	Impact	Overall Risk	Risk Management Actions Planned
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 energy, waste and resources more effectively reducing costs and carbon emissions where possible.

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 up to date 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 19th and 20th October 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 10th November 2021. The implementation of mitigation actions is managed through the Legislation Update Service which enables the 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'. An NCR 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. In the October 2021 audits there were 2 new Non-Conformance with Requirement (NCRs) found with 6 found in March 2021. Including the two new NCRs identified there are currently 3 NCRs open, 2 at the Town Hall and 1 at Woodgate Chambers. Five of the NCRs identified through the March audit have now been closed.
7. There were 13 new Issues found in the October 2021 audits with 14 Issues found in March 2021. All Issues raised in March have been closed. In the October audits 2 new Recommendations were raised with 5 recommendations made in March 2021. Three recommendations from March have been closed.
8. The audit findings are set out at Appendix A. A summary of the new Non-Conformance with Requirement (NCR) findings is presented below by site:

Town Hall

9. Housekeeping was found to be good throughout the premises with chemicals being stored in the correct locations such as cleaning cupboards. An NCR was raised for no waste transfer note being available for the collection of printer cartridges.

Woodgate Chambers

10. Though a limited area, housekeeping was of a high standard. An NCR was raised for the fire extinguishers not being serviced in over 2 years. This was in part due to the site not being Covid secure at the time an inspection was due.

Training

11. 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 is scheduled on 16th November to ensure ongoing environmental legal compliance and continual improvement.

Audit Frequency

12. Based on the relative environmental risks of the sites, it is considered that auditing each site every six months is unnecessary. Most of the paperwork and statutory inspections require renewal every 12 months. This means that the same paperwork is reviewed at both the full and interim audits. Over time compliance has increased and processes improved. The frequency of internal environmental audits could be reduced to every 12 months to reflect this.

Timetable

13. The proposed timetable for the 2022 environmental audit cycle is shown in the table below.

Event	Description	Date
Environmental Compliance Audit	To review effectiveness of environmental management system	March 2022
SLT Briefing of outcome	To consider non-compliance and any mitigating actions	May 2022
Audit Committee	To receive a report on the outcome of environmental audits	June 2022

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	
	March 2021	October 2021	March 2021	October 2021	March 2021	October 2021	March 2021	October 21
Museum	2	0	2	5	3	0	7	5
Ark Business Centre	1	0	1	0	0	1	2	1
Town Hall	1	1	4	0	2	1	7	2
Southfield Road	0	0	4	3	0	1	4	4
Woodgate Chambers	0	1	0	2	0	0	0	3
Oak Business Centre	1	0	3	3	0	0	4	3
General	1	0	0	0	0	3	1	3
Total	6	2	14	13	5	6	25	21

Summary Results of Internal Audits – October 2021

Charnwood Museum October 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update Oct 2021
Issue 1 (MI2)	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. A spill kit had not been purchased by the client. 19/10/21	In progress Open at 19/10/21
Rec 3 (MR5)	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 for the staff areas.	Review costings	To be reviewed as part of the 2030 Carbon Neutral Plan Open at audit 19/10/21
MI4 Open	19 Oct 2021	Museum Manager	The air conditioning requires leak testing.	The use of F gases and the maintenance of the systems they're used in is strictly controlled by UK F gas regulations. This is because, if leaked into the atmosphere, F-gases can dangerously contribute to global warming. Failure to comply with the regulations could lead prosecution.	6	2	3	Testing schedule behind.	Arrange leak test.	
MI5 Open	19 Oct 2021	Museum Manager	It needs to be ensured that weekly flushes of the water system are recorded	Legionella build up can be prevented by regular	5	1	5	Flushing schedule behind.	Maintain the weekly flushing schedule	

				flushing of the water system.						
MI6 Open	19 Oct 2021	Museum Manager	The sanitary waste transfer note season ticket is due to expire in the next 30 days.	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	Paperwork not yet in place	Contact the supplier and obtain a new season ticket	
MI7 Open	19 Oct 2021	Museum Manager	A process needs to be put in place to ensure that printer cartridge waste is not being stored for more than 12 months.	Holding waste on site for longer than 12 months 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	1	3	Process not in place	A process needs to be put in place to ensure that printer cartridge waste is not being stored for more than 12 months.	
MI8 Open	19 Oct 2021	Museum Manager	MI8 - 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 The Department for Communities and Local Government guidance on 'Display Energy Certificate and Advisory Reports for Public Buildings' states that "To enable members of the public to view the document easily, it should be no smaller than A3 in size".	3	2	1	Lack of awareness of requirement.	Change the Display Cert to be A3 size	

Ark Business Centre October 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
AR1	19th Oct 2021	Building Manager	The servicing of the fire extinguishers is due within the next 30 days.	There is a risk to the environment and life if fire extinguishers are not in a serviceable condition. It is required by law to(a)take such general fire precautions as will ensure, so far as is reasonably practicable, the safety of any of his employees; and (b)in relation to relevant persons who are not his employees, take such general fire precautions as may reasonably be required in the circumstances of the case to ensure that the premises are safe.	6	2	3	TBC	Arrange for the servicing to be carried out	In Progress open 19/10/20

Town Hall October 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update Oct 2021
NCR 4 (TNC R2)	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.	19/10/2021 This remains outstanding as the transfer note could not be evidenced at the time of the audit as the person responsible is on long term leave. This NCR remains open.

Town Hall October 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update Oct 2021
Issue 4 (T16)	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	Closed at audit 19/10/21
Issue 5 (T17)	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	Closed at audit 19/10/21
Issue 6 (T18)	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 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	Not supplied by service company	Obtain certificate	To be progressed

Town Hall October 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update Oct 2021
Rec 4 (TR5)	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 (TR6)	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	Closed at audit 19/10/21
Rec 6 (TR7)	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 Closed at audit 19/10/21
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 October 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update Oct 2021
TNC R3	19 th Oct 2021	Town Hall Technical Manager	There is no waste transfer note for the collection of printer cartridges.	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.	3	2	6	Lack of knowledge of this waste stream and its collection arrangements	This needs to be investigated and obtained	Open at 19/10/2021
TR8	19 th Oct 2021	Town Hall Technical Manager	Consideration should be given as to only granting access to the site for air conditioning engineers whose competency has been proven prior to arrival.	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.	1	2	3	Incompetency on the part of the service company	In the case of leak testing, consideration should be given as to only granting access to the site for air conditioning engineers whose competency has been proven prior to arrival.	Open at 19/10/2021

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 (TR4)	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	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 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
				BC should take action to avoid an environmental risk.						

Southfield Road Offices October 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update Oct 2021
Positive Observation			Good practise is being shown through the retention of NHS waste documentation.							
SI7	20 th Oct 2021	Building Manager	SI7: It should be ensured that recycling waste is not disposed of in the general waste.	Failure to comply with the waste hierarchy and risk of pollution. The Environmental Protection Act 1990 imposes a duty of care on persons concerned with handling waste. This Duty of Care affects anyone who produces, imports, carries, keeps, treats or disposes of controlled waste, or as a broker has control of such waste.	4	1	3	Staff not following correct process	Address the issue with staff	Open at 20/10/2021
SI8	20 th Oct 2021	Building Manager	SI8: A process needs to be put in place to ensure that printer cartridge waste is not being stored for more than 12 months.	Holding waste on site for longer than 12 months indicates that the duty of care has not been followed, which could result in prosecution by	4	1	3	Process not in place	A process needs to be put in place to ensure that printer cartridge waste is not being stored for more than 12 months.	Open at 20/10/2021

Southfield Road Offices October 2021 Audit

Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update Oct 2021
				the Environment Agency should the waste management practices of Charnwood BC be investigated.						
SI9	20 th Oct 2021	Building Manager	SI9 The Display Energy Certificate has expired.	A local authority can issue a penalty charge notice of £500 for failing to display a DEC The Department for Communities and Local Government guidance on 'Display Energy Certificate and Advisory Reports for Public Buildings' states that "To enable members of the public to view the document easily, it should be no smaller than A3 in size".	4	2	2	Lack of awareness of requirement.	Obtain a new certificate	Open at 20/10/2021
SR1	20 th Oct 2021	Building Manager	To refresh spill response training at least every 12 months.	To prevent pollution in the event of a spill and reduce risk to the environment	3	1	2	Lack of awareness of requirement.	Spill response training was last conducted in August 2020, best practice suggest that this is conducted every 12 months.	Open at 20/10/2021

Oak Business Centre October 2021 Audit										
Ref	Date Raised	Process Owner	Description of Non-conformity	Risk phase	Overall Risk Rating	Likelihood	Impact	Root Cause	Recommended action	Update October 2021
NCR 5 (ONC R1)	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	Closed in audit 20/10/21
O14 Open	20 th Oct 2021		O14: The servicing of the fire extinguisher needs to be conducted in the next 30 days.	There is a risk to the environment and life if fire extinguishers are not in a serviceable condition.	6	2	3	Fire extinguisher service nearly due	Arrange service date	Open at 20/10/2021
O15 Open	20 th Oct 2021		O15: The season ticket for general and mixed recycling expires within the next 30 days.	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	Paperwork not yet in place	Contact the supplier and obtain a new season ticket	Open at 20/10/2021
O16 Open	20 th Oct 2021		O16: The sanitary waste transfer note season ticket is due to expire in the next 30 days.	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	Paperwork not yet in place	Contact the supplier and obtain a new season ticket	Open at 20/10/2021

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 Oct 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	In progress
GR2	20 th Oct 2021	Building Managers	Consideration should be given as to whether a consistent approach is required for the management of printer cartridge waste.	Holding waste on site for longer than 12 months 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	4	1	3	Process not in place	A process needs to be put in place to ensure that printer cartridge waste is not being stored for more than 12 months, perhaps the same approach for each site.	Open at 27/10/2021

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 Oct 2021
				Charnwood BC be investigated.						
GR3	20 th Oct 2021	Sustainability Officer	Consideration should be given as to whether the frequency of internal environmental audits should be reduced to every 12 months.	Reducing frequency of audits to 12 months	TBC			Limited risk as audits have taken place 6 months previously	Review the frequency requirement	Open at 27/10/2021
GR4	20 th Oct 2021	Sustainability Officer	Consideration should be given as to how none office based roles can participate in the Green Rewards Scheme.	Carbon saving measures should be adopted where possible throughout the organisation	TBC			Lack of involvement of none office based staff	Find a way to involve none office based staff	Open at 27/10/2021

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