

INTERNAL AUDIT REPORT

FROM: Audit and Risk Manager **SUBJECT:** Leisure and Recreation

Facilities

TO: Head of Safer Communities, **DATE:** 22 April 2024

Leisure & Environment

C.C. Chief Executive

Programme Director for Climate

Change

Head of Finance

Sports & Leisure Contract

Manager

Portfolio Holder (Cllr Sinnott)

1 Introduction

- 1.1 In accordance with the Audit Plan for 2023/24, an examination of the above subject area has recently been completed by Emma Walker, Internal Auditor, and this report presents the findings and conclusions for information and, where appropriate, action.
- 1.2 Wherever possible, findings have been discussed with the staff involved in the procedures examined and their views are incorporated, where appropriate, into the report. My thanks are extended to all concerned for the help and cooperation received during the audit.

2 **Background**

- 2.1 There are several leisure facilities throughout the district that are managed by the Council; these include bowling greens, tennis courts, football pitches and cycle tracks.
- 2.2 It should be noted that the leisure centres managed by Everyone Active were not included as part of this audit, as these are covered under the scope of the Leisure Facilities Contract audit.
- 2.3 As of March 2024, the total income received from the various sport and leisure facilities amounted to approximately £152,000.

Objectives of the Audit and Coverage of Risks

3.1 The management and financial controls in place have been assessed to provide assurance that the risks are being managed effectively. It should be noted that the risks stated in the report do not represent audit findings in themselves, but rather express the potential for a particular risk to occur. The findings detailed in each section following the stated risk confirm whether the risk is being controlled appropriately or whether there have been issues identified that need to be addressed.

- 3.2 In terms of scope, the audit covered the following risks:
 - 1. Insufficient budget to manage the facilities.
 - 2. Risk of not obtaining potential income sources.
 - 3. Delay in resurfacing courts leading to loss of income.
 - 4. Operation of Cycle Trails.
 - 5. Failure of contractors to deliver services.
 - 6. Risk of major contractor going into administration or deciding to withdraw from the contract.
 - 7. Failure to respond to complaints.
 - 8. Failure to communicate effectively/give stakeholders the incorrect information and advice.
 - 9. Unable to meet Leisure Development Programme targets.
 - 10. Community not sufficiently supported to increase activity levels.
 - 11. Unauthorised access to buildings.
 - 12. Lack of security over equipment or user's belongings.
 - 13. Falsification of attendance records/income.
 - 14. Lone working.
 - 15. Risk of violence/threats/injury/abuse to staff on site.
 - 16. Accidents to staff and customers, serious injury, heart attack, loss of life at community pitches, sports events.
 - 17. Deterioration of playing surface leading to injury.
 - 18. Legionella in operational buildings.
 - 19. Damage to new bowling greens from extreme weather or vandalism.
 - 20. Bowling greens not maintained in accordance with STRI guidance.
- 3.3 A 'risk-based audit' approach has been adopted, whereby key risks have been identified during discussions between the Internal Auditor and key departmental staff. The Safer Communities, Leisure and Environment and Significant Business Risk Registers have also been reviewed.
- These risks, if realised, would be detrimental to the Council with regards to meeting Priority 3 of the new Corporate Strategy, 'Warwick District 2030'. The Council aims to promote physical health and wellbeing and reduce health inequalities across the district.

4 Findings

4.1 Recommendations from Previous Reports

4.1.1 The current position in respect of the recommendation from the previous audit undertaken in March 2019 was also reviewed. The current position is as follows (overleaf):

Recommendation	Management Response	Current Status
The Code of Procurement Practice should be followed in relation to all purchases. (In this situation it applies as purchases through the year total over £9,999 with one supplier.) Staff should have procurement training and apply the guidance provided by the Procurement team.	We will go through the policy relating to the procurement to ensure that the main processes are fully understood.	It was found during the 2023/24 audit that expenditure with the supplier concerned amounted to approximately £1,700, negating the need to tender a formal contract. Expenditure by the Sports & Leisure team amounted to £360; the remaining £1,340 was spent by the Green Spaces team.

4.2 Financial Risks

4.2.1 Potential Risk: Insufficient budget to manage the facilities.

As the budget holder, the Sports & Leisure Contract Manager (S&LCM) meets frequently with the Trainee Assistant Accountant. The Sports & Leisure Contract Officer (S&LCO), as the Operations Team Leader, is also involved in budget meetings. There are various budgets in place for the service, including Leisure Recreation Centres (Castle Farm, Abbey Fields, John Atkinson, Newbold Comyn, and St Nicholas Park) and Outdoor Sports Facilities (Abbey Fields, Edmondscote Track, Jephson Aviary, Christchurch Gardens). Expenditure against these budgets was found to be within target. It should be noted, however, that the Jephson Aviary has been included in error against the budget for Outdoor Sports Facilities; the S&LCM advised that this is a historical code. Furthermore, the Community Centre budget includes Lillington, Packmores and Barford. The Packmores and Barford community centres should not be included under this code, as they are not managed by the Sports and Leisure team.

Advisory – Consideration should be given to removing the redundant Jephson Aviary and community centre cost codes from the Sports and Leisure budget.

There has been an overspend of £36,401.30 against the Outdoor Recreation budget; however, this relates to the cleaning contract, which is not managed by the Sports and Leisure team but by the Neighbourhood Services team.

Fees and charges are benchmarked against other local parks tennis through the Lawn Tennis Association (LTA). The new tennis contract operator, We Do Tennis, also worked with the Council to set the tennis fees for 2023/24; charges for tennis family passes were set in conjunction with the LTA. The Sports & Leisure team research local operator websites in order to help benchmark prices.

Overall, there has been an increase in income for the bowls, community centres and outdoor sports facilities during 2023/24. Expenditure against the community centres, outdoor sports facilities, recreation centres and Edmondscote athletics

track has reduced. The income for the athletics track has slightly diminished; however, this is due to the management of the track being handed over to Everyone Active. Expenditure against the bowls budget saw an increase of approximately £5,550 during 2023/24.

A review of payments to suppliers from January 2023 to January 2024 was conducted by the auditor. Significantly high payments were identified in three cases where no contract had been procured:

- January 2023 CIA Fire & Security Ltd for entrance systems and access code subscriptions = £11,503.20.
- April 2023 Fosse Contracts Ltd for refurbishment of Victoria Park Tennis Courts = £98,067.82.
- July 2023 Fosse Contracts Ltd for sports equipment maintenance = £26,451.44.

It should be noted that Fosse Contracts Ltd were commissioned by the LTA to refurb the Victoria Park Tennis Courts, via a grant, to be awarded on completion of the works. The contract sum (£102,666.03) has been partially paid; the retention fee of £2,566.65 is due to be finalised in May 2024. The S&LCO advised that there was a defect on one of the courts, hence the delay in payment of the retention fee. This contract was procured through the Project Team as Fosse were awarded the contract to resurface all national tennis courts through the LTA. As the Abbey Fields tennis courts are not due to be resurfaced until at least 2026, there is no need to reprocure a formal contract at this stage.

CIA Fire & Security Ltd, as the only LTA supplier, provide the access gates to the tennis courts. We Do Tennis pay for any repairs to the gates, whereas WDC commission replacement gates if required.

There are various other contracts in place that support the service, including a full-playing pitch strategy and a community tennis programme. Maintenance of the Newbold Cycle track lies with the Council's Assets team. We Do Tennis were charged £18,333.37 for the community tennis contract during May 2023 to April 2024. This figure does not include the May instalment, as agreed by the S&LCM, due to the delay in the resurfacing of the Victoria Park Tennis Courts. We Do Tennis have thus far paid £15,000.03 towards the charge; the two outstanding transactions are due in March and April, respectively.

4.2.2 Potential Risk: Risk of not obtaining potential income sources.

Fees and charges are agreed annually by Members and displayed on the Council website. The fees and charges for 2023/24 were agreed at Cabinet on 3 November 2022; the fees and charges for 2024/25 were agreed at Council on 15 November 2023.

As We Do Tennis manage the tennis courts on behalf of Warwick District Council (WDC), they are also responsible for setting the fees; these are outlined on the Council's website. Park exercise permits are temporarily suspended until further notice, due to a review of the Park Exercise Permit Policy taking place. The Sports and Leisure team are in the process of producing a report for Cabinet to discuss either restarting or discounting this scheme.

A number of invoices were obtained by the auditor to ensure that the fees charged accurately reflected the fees agreed by Members. There were just three charges that did not match the published fees. In one case, the charge was reversed as the invoice was incorrect and, in another case, a four-month temporary arrangement was put in place with the relevant debtor. All payments were correctly reflected in the Ci Anywhere journals.

Three cases relating to the hire of the Old Library were included in the sample; two invoices were distributed prior to the hire date and all three payments were received in advance of the due date (one of which was paid in instalments). The hire fees all matched the charges agreed and were correctly reflected through Ci Anywhere. Five senior football teams and five junior football teams were tested to check that they had been charged correctly for the 2023/24 football season; all charges bar one were correct.

Recommendation - Business Administration Officers should include the breakdown of charges on all invoices, including any discounts awarded, to ensure that all fees charged are correct.

The S&LCM advised that cash collection on site is rare as most facilities are now cashless; most customers book and pay in advance before using the facilities. WDC do not take one-off hires for football pitches. Instead, football clubs have to pay a monthly direct debit to cover the costs of the football season.

A number of booking forms were obtained through the network files. These were then traced to the Finance Management System by the auditor to ensure that payment had been received in a timely manner. A number of bookings were investigated, including the athletics track, tennis courts, bowling greens and bowls function room. Booking forms were all received in advance of the activity date. Debtors were mainly invoiced after the activity took place, although four debtors were invoiced prior to the activity date. Only five cases were paid on time; at the time of testing, one invoice was still outstanding. All payments received were correctly reflected in the Ci Anywhere journals.

There is an agreement in place with Bowls England that they are not charged for their events or bookings. Instead, they give a donation of £2,400 each year to WDC for the supply of the bowls service.

Advisory - Consideration should be given to invoicing all debtors prior to the activity date; outstanding payments should be chased when not received by the invoice due date.

4.2.3 Potential Risk: Delay in resurfacing courts leading to loss of income.

The tennis courts in Christchurch Gardens, St Nicholas Park, and Victoria Park have all recently been refurbished.

IDVERDE, as part of the Grounds Maintenance contract, were responsible for ensuring that the tennis courts were cleaned, sprayed, and brushed. There was an issue flagged in December 2023, whereby IDVERDE should have maintained the tennis courts in November, but this did not take place. IDVERDE advised that they would be completing power brush works in December and it was

decided that power brushing would take place in lieu of pressure washing; this occurred on 14 December 2023. We Do Tennis have since assumed responsibility for maintenance of the courts. Long-term planned preventative maintenance is in place to be paid by ring-fenced funds from the We Do Tennis concession fee.

The expiry rectification date for the resurfacing of the tennis courts is May 2024, meaning that any resurfacing issues would have to be rectified by Fosse Contracts Ltd up to this point. A provisional programme of works was provided as part of the contract which stipulated the various tasks to be completed between January and April 2023.

4.2.4 Potential Risk: Operation of Cycle Trails.

The Newbold Cycle Trails are inspected weekly by numerous groups including Campbell Coaching, WDC and the Royal Leamington Spa Cycling Club (RLSCC). Inspections are conducted on the trails to ensure that they are graded in accordance with British Cycling Standards and that there is adequate signage on site. The RLSCC inspections consist of members of the club riding the trails with a head camera on; these take place three times a week. Members of the WDC Sports and Leisure team also undertake walked inspections of the trails on a weekly basis. Inspections of the trees are undertaken by the WDC Green Spaces team. Any defects that require trail maintenance must be reported to the WDC Sports and Leisure Team who will initiate the relevant response and arrange for a contractor to repair the trail. Health & Safety compliance checks are completed as part of the trail inspections. A ROSPA inspection of the drainage ditches, signage, jumps and climb tracks was also conducted in March 2023.

Once inspection and other trail information from users is collated and prioritised, remedial work can then be authorised to take place. Emergency inspections are triggered by severe weather alerts and, if required, the trails will be closed and diverted with the relevant signage put in place to warn cyclists.

There is a maintenance manual in place for the Newbold Comyn mountain bike trails and the RLSCC work with WDC to maintain the trails. The mountain bike trail management procedures consist of both general and emergency maintenance that may be required. Typical defects that would need to be classed as a high priority include where trees have fallen across the trails. On lower graded green or blue trails, a badly washed-out section of the trail would constitute a high priority defect, requiring the trail to be closed. Medium priority defects include any signage issues, or other faults on the trail surface that do not pose an immediate risk but need rectifying as soon as possible. Low priority defects are those that affect the ride quality of the trails, but they do not affect safety, such as the trail holding water. Routine maintenance tasks largely centre on preventing water from pooling on the trail surfaces, diverting running water away from the trails, and clearing any branches or leaves.

Remedial action is prioritised in three categories: red, where a health and safety issue poses an immediate risk to riders; orange, where it is not an immediate risk to riders, but the defect should be repaired as soon as possible and blue, where an issue does not pose any health and safety risk but does detract from the visitor experience and enjoyment of the trail. A site log is in place which lists

the various checks undertaken and any concerns that have been raised during a site inspection.

The Sports and Leisure team have compiled a centre safety operating procedure for the cycle trails. This includes operational procedures, health and safety guidance, cleaning and maintenance schedules and a lost children/vulnerable adult policy; this was last updated in September 2023. When out of operation, Allworks Construction Ltd barrier the cycle trails off during the week. At weekends, the Lifeline team will notify a member of the Sports and Leisure team that there is an issue, and the contractors are then instructed to close the trails. A safety management plan has been compiled to demonstrate how WDC proposes to manage the trails safely. A 24-hour contact phone number directed to the Council's Lifeline service call centre is promoted on cycle trail signage, to help ensure that site users have access to emergency support at all times.

There are several signs in place to prevent pedestrians from walking across the trails. Signage at key access points provides direction to the most suitable route of access for cyclists using the trails. Currently, the Sports and Leisure team are looking to put clearer forms of signage in place regarding trail difficulty levels. There are lecterns at the start of the trails, which help direct users along the relevant tracks. The lecterns also provide users with location information, useful phone numbers and health, and safety requirements.

The trails have been promoted through various methods including the WDC website, local news, and social media platforms.

4.3 **Legal and Regulatory Risks**

4.3.1 Potential Risk: Failure of contractors to deliver services.

The athletics track is now outsourced to Everyone Active, although contract management is still performed by WDC. The Active Communities Team Leader supervises the contract with We Do Tennis.

The expected standards of work are written into the various contracts. We Do Tennis are responsible for keeping facilities in good condition and to the appropriate standards of cleanliness. All courts must be operated in accordance with the LTA and Sports and Play Construction Association. We Do Tennis spot check their coaches to ensure that they are delivering the required standard and self-employed coaches are all LTA accredited. It should be noted that the Sports and Leisure team received the Warwickshire LTAs 'Park of the Year' award for the delivery of affordable and free tennis sessions with We Do Tennis.

As Everyone Active now manage the athletics track, they are responsible for the booking, staffing, cleaning, and marketing of the facility. WDC remain responsible for grounds maintenance, the removal of waste and maintaining the general fabric of the building, although Everyone Active are responsible for keeping the track in good repair and ensuring that the site is appropriately secure.

There are various KPIs in place with We Do Tennis. These include risk management and compliance, programme delivery, service quality and social

value. All KPIs are expected to meet a service level target of 100%, apart from customer satisfaction which has a target of 95%. As part of the contract with We Do Tennis, quarterly reports are sent to WDC to monitor progress. These include court utilisation income, customer satisfaction, health, and safety issues, and any plans for the next quarter. The We Do Tennis KPIs are monitored monthly. It was decided that once the community tennis scheme was fully functional at Victoria Park, it would then expand to cover the tennis courts at Christchurch Gardens and St Nicholas Park.

IDVERDE, as part of the Grounds Maintenance contract, are required to maintain various hard surface ball courts across the district for the provision of tennis and basketball facilities. This includes keeping courts clear of litter or debris and applying an approved herbicide. IDEVERDE also have to check the posts and nets, make any defects or vandalism safe pending repairs, and jetwash all hard-court surfaces annually during the winter, when there is less play on the courts.

There have been some issues with the Churchill building cleaning contract; the S&LCM advised that attendants do not always turn up, resulting in the WDC team having to attend the site during out of office hours. The Contract Development and Enforcement Officer defaults Churchill each time that this occurs, and, in each case identified by the auditor, the contractor had been notified that the facilities had either not been cleaned after use, or attendants had not arrived on time. In all cases identified, payment was not made until the issues had been rectified.

4.3.2 Potential Risk: Risk of major contractor going into administration or deciding to withdraw from the contract.

Meetings with Everyone Active take place weekly and the Active Communities Team Leader meets with We Do Tennis on a monthly basis; the S&LCM also holds Sports Team management meetings once a month. Outdoor sports meetings take place on a monthly basis in which any issues regarding the bowls, football pitches and pavilions are discussed. The S&LCM and S&LCO have received contract management training and the S&LCM, in conjunction with the Procurement Business Partner, will check the credit rating of contractors to ensure that they can meet financial demands.

The various contracts in place make specific reference to the roles and responsibilities of all parties involved. Churchill are responsible for assessing the cleaning requirements and, as keyholders, must also unlock/lock the sports pavilions as per the designated opening and closing times; any lost or damaged keys are to be replaced at the contractor's expense. We Do Tennis are responsible for the purchase of all goods and materials needed for the provision of the service and are responsible for the payment and annual maintenance of the Smart Access gates. We Do Tennis also manage the court bookings and ensure that court users adhere to their allocated time slots. The day-to-day maintenance and cleaning of the courts remains the responsibility of We Do Tennis. WDC also maintains responsibility for any major repairs such as the resurfacing and repainting of the courts or replacing fencing and floodlights. We Do Tennis provide coaches in order to deliver the tennis activities and provide all

tennis equipment, apart from the rebound wall in situ at Victoria Park which remains the Council's responsibility.

There have been some requirements to amend these contracts. The community tennis programme was due to commence in April 2023, but the resurfacing of the courts was not completed by this date and so the tennis programme could not be launched until June 2023. As a result of this, it was agreed by the S&LCM that the first instalment owed to the Council could be waivered. A deed of variation for the tennis courts at St Nicholas Park has also occurred. As We Do Tennis have now successfully taken on the tennis court activities, the deed removes all rights and obligations from Everyone Active with regards to the provision of tennis courts at St Nicholas Park.

As part of the booking packs provided by WDC to the various hirers, an emergency action plan is included and outlines the procedures to be followed in the event of a fire, explosion, suspicious package, or medical emergency. This plan also contains useful information about the relevant facility, including defibrillator locations, a map of the area and officer contact details. There has been an issue with the Harbury Lane Pavilion, where frequent flooding has occurred; the contractors have closed the pavilion and all football teams have been moved to Newbold Comyn in order to minimise service interruption.

4.4 Reputational Risks

4.4.1 Potential Risk: Failure to respond to complaints.

There is no specific complaint procedure in place as the Sports and Leisure team abide by the corporate complaint procedure; the team tend to receive service requests more than complaints. If a complaint is received, the complainant is sent directly to the contractor. If the issue is not resolved, the complaint is then passed back to WDC for resolution. The Council aims to investigate complaints within twenty working days. There are certain complaints that will be prioritised, investigated, and reported on within five working days, where particular circumstances identify vulnerability and/or a need for urgency. A log is maintained by the team of all sports and leisure-related complaints/service requests. This outlines the responsible officer and details of rectification; most complaints received during 2023/24 related to Abbey Fields and the work at Castle Farm.

A number of complaints were obtained through the network files. These were then investigated by the auditor to check that appropriate action had been taken in a timely manner. In all cases tested, action had been taken to rectify the issue raised. In seven cases the complaint was responded to the following day; in six cases, the request was dealt with on the same day. There was just one issue that took over a month to address; however, this was the responsibility of the Programme Manager. There were just four cases where the complainant had not been notified of resolution.

Advisory - Consideration should be given to reminding staff to inform the complainant of any actions taken to resolve the issues reported.

4.4.2 Potential Risk: Failure to communicate effectively/give stakeholders the incorrect information and advice.

The fees outlined on the WDC website for the bowls and football pitch hire correctly reflect the 2024/25 agreed fees and charges. The prices on the Everyone Active website are also fully reflective of the WDC fees and charges. As part of the management contract with Everyone Active, these fees cannot increase and WDC has stipulated that Everyone Active cannot apply RPI/CPI increases on top of the agreed rates. Fees and charges are also physically displayed at the facilities. Football fixtures are on show at the various sports pavilions to advise visitors of any pre-booked sessions.

Opening times relating to leisure centres, the Edmondscote track, and the bowling greens are advertised through the WDC website. The bowling greens are unavailable from October to April due to seasonal conditions. Dates of closure such as bank holidays and Easter are also published trough this method. The Sports & Leisure team are working in conjunction with Bowls England on an app which will allow customers to book bowls sessions online.

As part of the building inspections conducted by Sports Assistants, staff and customer information is checked. This includes ensuring that the notice boards and public information are well maintained with relevant and current information; any adverse events are published on social media.

4.4.3 Potential Risk: Unable to meet Leisure Development Programme targets.

The Leisure Development Programme (LDP), first launched in 2015, has seen the redevelopment of the Newbold Comyn and St Nicholas Park Leisure Centres and the construction of a new artificial turf pitch at the Racing Club premises in Warwick. The demolition and reconstruction of Abbey Fields Swimming Pool is now underway, and the Castle Farm Recreation Centre has just reopened. The LDP also includes the work to establish a Community Stadium at Fusiliers Way. The aims and objectives of the LDP are to encourage healthy and active lifestyles in the district by providing a series of high-quality, up-to-date sport and leisure facilities. As this is such a large project, stages of the programme must be agreed by Members. There is an LDP schematic in place which details the phases and various projects to be completed as part of the programme.

There is a proposal to replace the existing athletics facility at the Edmondscote sports ground with a brand-new facility on land near Fusiliers Way, as the current facility is in need of substantial repair. The LDP recently assisted Whitnash Town Council in the construction of the Whitnash Civic Centre and Library in Acre Close Park. As part of this work, the skate ramp and the outdoor trim trail were both moved and refurbished, the playing pitches were re-laid, and a new car park was created. However, the existing Multi-Use Games Area (MUGA) was not improved. This needs significant refurbishment to bring it up to the quality of the other facilities in the area. It is known that there are a number of other MUGAs in the district that would also benefit from refurbishment. Furthermore, the Football Foundation has expressed a wish to provide funding for the improvement of existing MUGAs and the creation of new ones.

There are various milestones in place which set out the timelines for LDP project completion and there are clear job roles and responsibilities that have been produced for the completion of the LDP, including Programme Manager and Project Officers. This is, however, out of date and refers to officers who have either changed roles or no longer work for the organisation.

Recommendation – The LDP roles and responsibilities should be updated in light of staffing changes.

Advisory – Consideration should be given to aligning the LDP with the new Corporate Strategy.

4.4.4 Potential Risk: Community not sufficiently supported to increase activity levels.

Section 507B of the Statutory Guidance for Local Authorities requires the County Council to, so far as reasonably practicable, secure access for all qualifying young people to a sufficient quantity of educational leisure-time and recreational leisure-time activities for the improvement of their well-being, personal and social development. Section 507B covers the requirement for local authorities to secure access to these services for young people aged thirteen to nineteen and young people aged twenty to twenty-four with learning difficulties or disabilities. Local authorities must publicise information about the available youth services in their area and keep this information up to date. Local authorities should also ensure that young people can contact them about the information published.

Advisory – Consideration should be given to incorporating a leisure and recreation activities needs assessment in any future planning.

As part of the contract with Everyone Active and We Do Tennis, WDC are permitted access to the contractor's marketing strategies in which they formally advertise the facilities. Bowls England are responsible for their own promotion of the facilities and the Bowls Nationals. The Sports and Leisure team have stopped promoting football pitches, as the demand was only being met by existing clubs. With the regeneration of Castle Farm, this has meant that pitches have been lost and so the team did not wish to advertise football pitch hire, thus creating a demand that they could not supply.

Although there is no formal strategy in place to advertise the various leisure and recreational facilities, these facilities are actively promoted across a variety of platforms including the WDC website, social media, and posters. The CEX also includes sports and leisure updates in his weekly emails. The latest update promoted the Lillington Community Pantry which offers free seated exercise classes aimed at people with reduced mobility or those with a health condition. The brand-new Castle Farm Leisure Centre and Scout and Guide Centre also had a free open day to promote the facilities to the public.

There are no discounts for the hire of the facilities, although there are concessionary prices for senior citizens. We Do Tennis have also introduced annual passes to help make tennis across the area more accessible and cost effective. Purchasing an annual pass entitles users to a free court booking at any of the courts in the district. There is also the option for concessions and juniors

to book courts on a pay and play basis at a discounted rate. We Do Tennis offer coaching sessions and they promote events through their Facebook page.

4.5 Fraud Risks

4.5.1 **Potential Risk: Unauthorised access to buildings.**

The various facilities have procedure notes in place comprising the key code, alarm code, and opening, closing, and cleaning processes. There are also logs for the pavilions which provide digital confirmation that the properties have been unlocked and locked after use. These are in place for the Harbury Lane, Newbold Comyn, Victoria Park Tennis and Victoria Park Bowls pavilions. These reports also identify where the intruder alarm has been triggered and the actions taken to resolve this. Parallel Security Ltd provide reports to WDC on alarm activation which confirm whether the sites have been secured and the nature of the issues that triggered the alarms. The team maintain a list of alarm monitoring key holder information for each of the premises which detail the three key holders, their working patterns, and their contact details; these are signed and authorised by the Council's M&E Energy Officer.

During weekdays after 5pm, weekends and Bank Holidays, Parallel Security Ltd are the main point of contact should the intruder alarm be triggered at any of the facilities. Contact details for Parallel Security Ltd have been supplied to all of the premises concerned. The WDC Sports Assistants and S&LCO are the first point of contact Monday to Friday 8am-5pm.

The access codes to the bowls gates and tennis pavilion have been changed. The alarm codes for the various football pavilions and bowls pavilion have not been changed; however, the Sports and Leisure team are looking into this.

All contractors receive building inductions and WDC staff accompany contractors on site. There are sign-in sheets for visitors and contractors, although the S&LCM advised it is difficult to monitor the footfall during the Bowls Nationals or football matches. Everyone Active are responsible for recording the Edmondscote track visitor numbers.

4.5.2 Potential Risk: Lack of security over equipment/user's belongings.

All equipment owned by WDC at the facilities is inventoried. However, an update of the equipment inventories has not been completed since April 2023.

Advisory – Consideration should be given to updating the equipment inventories.

There is no formal security policy in place, although CIA Fire & Security Ltd have installed Smart Access entry gates at the various facilities. The normal operating procedures for the various facilities serve as the security policies. Security measures are also outlined in the various site emergency operating procedures. There are lockers at both the athletics track and the bowls club to ensure the safety of user belongings.

4.5.3 Potential Risk: Falsification of attendance records/income.

The Business Administration Officer (BAO) manages the bookings for the bowls pavilion and football pitches. At the start of each year, a booking pack is sent to the various clubs and teams. This includes a booking form, the terms and conditions of hire and an emergency evacuation procedure. Following the deadline date, the BAO collates the bookings and updates the booking calendars as appropriate. Each club is then emailed to confirm the booking and cost of hire.

Users wishing to play tennis must book directly through the We Do Tennis website. Bookings for sessions at the Edmondscote Track or district leisure centres must be done so through Everyone Active. A new booking system has been introduced on the Christchurch Gardens website to allow players to reserve basketball courts in advance.

Spreadsheets are maintained of block booking information which outlines the club details, days of training, session start and end times, and whether they have been invoiced quarterly or monthly. A booking calendar is also in place for each facility which details the monthly bookings, number of users and whether any specific equipment is required; this method ensures that double bookings are avoided. The Sports & Leisure team also maintain an allocation document which shows the pitch numbers booked by the various football teams.

Bowls and football user numbers are recorded through a spreadsheet. The information entered into the football usage spreadsheet automatically updates the total number of players that have used the pitches that season. The number of players per game depends on the ages of the teams. The Newbold cycle trails have counters which show the number of users. Everyone Active point of sales figures corroborate the user numbers at the athletics track and leisure centres. The Sports and Leisure team also use ClubSpark to record the tennis numbers, and these are also provided by We Do Tennis.

There is a 'no-play' policy in place; if football clubs do not pay up front, they cannot use the facilities. Although the football season starts in September, the first Direct Debit is taken in August to ensure that the club pay before use. The Football Association can also force clubs to pay upfront if required.

4.6 **Health and Safety Risks**

4.6.1 **Potential Risk: Lone working.**

During the Bowls Nationals, Bowls England are responsible for locking the bowls pavilion at night and for providing their staff with health and safety training. The WDC Sports & Leisure team does, however, remain on call during the bowls season. The team do not use body cams, but an ICE list is held online and accessible to managers. Officers conducting inspections at the various facilities include site visits on their calendars so that other officers remain informed of their whereabouts.

Advisory – Consideration should be given to performing health and safety refresher training on an annual basis.

Staff have received lone-worker training and WDC have a lone-worker policy in place. Staff must inform their line manager or other identified person when they will be working alone, giving accurate details of their location, and following an agreed plan to inform that person when the task is completed. This includes occasions when a staff member expects to go home following a visit rather than returning to their base. The team do have work mobile phones and record when they have arrived on and off site through WhatsApp. When entering premises, it is the WDC employee who has the personal responsibility to be aware of any foreseeable hazards and, so far as is reasonably practicable, protect themselves and other staff under their control. Where possible, two people should work together. Staff do not have Solo Protect devices, as they tend to visit facilities in pairs.

4.6.2 Potential Risk: Risk of violence/threats/injury/abuse to staff on site.

One of the Sports Assistants has received conflict management training, but this is not seen as a necessity for staff. All staff have access to the staff alert list via the Intranet. There is also a staff alert list map layer which shows nearby entries should officers be out conducting site visits.

There is no attendant policy per se, although there are specifications by which the attendants must abide. These are contained in the attendant contractor information and include the various opening and closing procedures. External checks comprise checking the building for damage/signs of vandalism and ensuring that the contractor has cleaned the facilities to good hygiene practices and current COSHH regulations. WDC conduct spot checks at facilities to ensure that attendants are compliant; the IDVERDE attendant contracted to work the Edmondscote track has been TUPE'd and now attends to the track on behalf of Everyone Active.

As part of the Grounds Maintenance contract, IDVERDE provide an attendant at the Victoria Park bowls pavilion during the bowls season. The attendant is responsible for the collection, administration and secure storage of all cash taken from the sale of tickets to members of the public for pay and play on the bowling greens, although the S&LCM advised that cash is rarely taken onsite anymore.

4.6.3 Potential Risk: Accidents to staff and customers, serious injury, heart attack, loss of life at community pitches, sports events.

Risk assessments are in place for the various facilities and contractors are expected to provide their own risk assessments; copies of these are passed to WDC when requested. There are some risk assessments on Assessnet relating to the sports and leisure facilities, including the overflow carpark at the Edmondscote Track, the Victoria Park bowls pavilion and staff requirements for the Bowls Nationals; these assessments are not due for review until June 2024. There is one assessment regarding the poplar trees at the athletics track which was due a review on 1 March 2024.

Recommendation – The risk assessment relating to the Poplar trees at the Edmondscote athletics track should be reviewed and updated where appropriate.

The risk assessments in place detail the measures to mitigate fire safety, traffic management, anti-social behaviour, adverse weather, hazardous substances, manual handling, and falling objects, amongst other risks. Risk assessments were conducted in October 2023 relating to the BMX and Newbold cycle trails by the S&LCO. An external risk assessment was also conducted on the mountain bike trails by Campbell Coaching.

Fire risk assessments were carried out in October 2023 on all the sports pavilions as well as the Victoria Park Bowls café and Edmondscote track. The assessments investigated the hazards around smoking, cooking, lighting, and heating and also examined the fire escape, fire safety, emergency escape lighting and fire drill testing measures in place. As a result of these assessments, action plans have been compiled by the Sports and Leisure team detailing remedial action to be taken. It appears, however, that this action plan has either not been completed or not been updated, as several actions are outstanding. Both the S&LCM and S&LCO advised that whilst the Sports & Leisure team retain responsibility as building managers, they are heavily reliant on the Assets team having completed the fire risk assessments in a timely manner.

Recommendation – A) fire risk assessments should be completed by the Assets team in line with the specified timescales. B) the Sports & Leisure team should be ensuring that these risk assessments are completed.

Inspections to the fire panels and alarm systems are conducted at the Edmondscote track and sports pavilions by Fire Safe Services Ltd; these last took place in January 2024.

It is in the hiring terms and conditions that hirers use the facilities at their own risk and are responsible for undertaking their own risk assessment before each event. Any issues with the facilities are raised either through site inspection visits or directly to the Sports and Leisure team. Any serious maintenance issues at the tennis courts are raised by We Do Tennis. The Lifeline team have also been provided with the Sports Assistants contact details should a member of the public call regarding the Harbury Lane or Newbold Comyn pavilions.

There is a centre safety operating procedure in place for the Edmondscote track, Harbury Lane Pavilion, Victoria Park Bowls Pavilion and Victoria Park Tennis Pavilion. All equipment is regularly inspected for defects; the hirer is responsible for inspecting equipment before the event and must inform the attendant of any defects before use. If maintenance issues are found at the facilities, these are raised with the Council's Assets team. Building surveyors maintain logs of works that have been completed; any emergency issues involve a direct call out to the contractor.

There has been a recent insurance issue at the Harbury Lane pavilion, in which the roof collapsed; however, WDC have received the funds for this. WDC insure the athletics track and tennis pavilion but not the tennis courts; We Do Tennis have their own Public Liability, Employers Liability and Professional Indemnity Insurance. If, however, it was found that there had been a failure to maintain the playing surfaces, the Council would be liable. The bowling greens and

pavilion are owned by WDC and are, therefore, automatically included in the insurance. Football pitches are not insured, but WDC does have a responsibility to maintain the grass.

Group users are expected to provide their own insurance. A number of booking forms were obtained through the network files. These were then investigated by the auditor to check that hirers had appropriate insurance cover in place during the course of an event. Fourteen of the twenty cases tested had all provided a valid insurance certificate, in which the date of the activity was sufficiently covered. There was just one case where the insurance dates provided on the certificate were out of date during the activity. All cases had a minimum cover of £10,000,000 and all of the insurance certificates were received prior to the activity date.

Advisory – Consideration should be given to reminding staff to check that the date of insurance sufficiently covers the date of an activity.

4.6.4 Potential Risk: Deterioration of playing surface leading to injury.

An IDVERDE maintenance schedule is in place, which outlines when the tennis courts have been swept, jet washed, and an herbicide/fungicide applied. Condition surveys also contain a schedule of the works required and the timeframes for completion. White Line Services deliver the Edmondscote track washing as and when requested by WDC. This is to deep clean the track surface, all pole vaults, run ups and the high jump fence.

Site inspections are carried out by the WDC Sports Assistants on most facilities apart from the football pitches; these are conducted by IDVERDE as part of the Grounds Maintenance contract. Football pitch inspection feedback is provided to WDC by IDVERDE pertaining to the pitch lines, posts and bolts, grass height and pitch conditions. These inspections also notify the Council if the surface is unsuitable for play.

Inspections conducted by WDC Sports Assistants are performed on the tennis courts, Edmondscote track, sports pavilions, and leisure centres. These inspections help to determine the cleanliness, maintenance and health and safety rating of the facilities. Maintenance issues found during these inspections are flagged through Total mobile in which photographs of the issues can be immediately uploaded.

The football facility terms and conditions make several stipulations to ensure the integrity of the playing surfaces are maintained. Clubs are instructed to keep off sanded areas, not wear boots in the pavilions and not wash boots in the changing rooms. The clubs are liable in respect of any damage caused to the facilities during use and indemnify WDC against all costs.

Labosport Ltd are commissioned by WDC to conduct condition surveys and feasibility reports on several of the tennis courts in the district. These include performance results on the surfacing, drainage, court fencing, floodlighting, and equipment. As a result of these surveys, Labosport recommend the steps to be taken to overcome any issues and provide a rough cost estimate. These were last conducted in December 2023. WDC have also commissioned Track Mark to

inspect the athletics track and throwing cage to ensure that these comply with health and safety standards; these were conducted in January 2024. Halliday Lighting Ltd performed electrical testing on the Victoria Park tennis court floodlights and have indicated a regime for maintaining the sports floodlighting including cleaning and checking cable connections.

The tennis surface is fully permeable, hard-wearing, and playable throughout the year; as a result, it requires relatively little maintenance. Following the resurfacing of the tennis courts at Victoria Park, the contractors issued maintenance guidelines to care for the new surface, including removing debris, ensuring appropriate footwear is warn and emptying nearby litter bins. Play is not permitted in hot weather due to the surface softening. It is advised that the net is slackened daily, leaves and weeds are cleared weekly, moss and algae is dealt with monthly, and the court is washed, and moss killer applied annually.

A compliance spreadsheet has been collated, outlining where building safety checks have taken place at each facility including fire alarm testing, legionella flushing, emergency lighting testing, intruder alarm inspections and asbestos, gas safety, and fire extinguisher checks. As aforementioned, timely completion of compliance checks relies on the Assets service having completed their duties beforehand. The S&LCO advised that they have been waiting on the Assets team to complete PAT testing for approximately eight months. The Assets team have been informed of this issue and have been reminded to complete these works in a timely manner. The S&LCO advised that he will also be liaising with the Health & Safety and Premises Manager regarding Assessnet, as the system is proving to be problematic when addressing tasks that require action.

Recommendation – A) compliance works should be completed by the Assets team. B) the Sports & Leisure team need to ensure that these compliance works have been completed and update the compliance spreadsheet accordingly.

Sixteen facilities were checked by the auditor to ensure that they had received frequent inspections from January 2023 to March 2024. The Edmondscote track received inspections every month apart from in January and March 2024; only four months had weekly inspections. The Harbury Lane Pavilion was inspected every month, with seven of these months receiving weekly visits. The Newbold Pavilion was also inspected every month, with six of these months receiving weekly visits. The Christchurch Tennis courts, and Victoria Park Tennis courts were only inspected monthly after May 2023, in which five of those months received weekly inspections. St Nicholas Tennis courts were inspected in June 2023 and then monthly from August 2023 to January 2024 (only during November 2023 were the courts inspected weekly). The Victoria Park Bowls Pavilion had been inspected every month (six months received a weekly inspection). The Newbold Cycle Trails were inspected in August before they opened and have been inspected monthly since October 2023. The community centres have, however, received very little inspection:

- John Atkinson = inspections in July and September 2023.
- Meadows Community Centre = inspections in June and July 2023 (this facility is now permanently closed).
- Newbold Comyn = inspections in June, July, August, and December 2023.

- St Nicholas Park = inspections in June, July, and August 2023.

It was confirmed by the both the S&LCM and S&LCO that these checks had in fact been completed but had not been correctly filed.

Recommendation - Staff should be reminded to file monthly and weekly inspections, where necessary.

The football pitches have only received monthly inspections since September 2023, with no inspections taking place during December or March 2024. The St Nicholas pitch did not get inspected during January or February 2024. All football pitches were, however, inspected weekly in October 2023. The Castle Farm pitches were inspected in January and February 2024, following the reopening.

Recommendation - IDVERDE should be reminded of their contractual obligation to inspect the football pitches on a regular basis.

There were three months of inspections where the inspection sheet for Victoria Park had been saved in the Christchurch Gardens folder and vice versa. Similarly, the John Atkinson September visit had been saved in the August visit folder.

Advisory - Consideration should be given to reminding officers to file documents in the correct folders.

4.6.5 **Potential Risk: Legionella in operational buildings.**

As part of the corporate cleaning contract with Churchill Contract Services Ltd, the sports pavilions and toilets are to be cleaned once a week. Football attendants at the Newbold Pavilion and Harbury Lane Pavilion are expected to clean the facilities; shower rooms are cleaned monthly. During the bowls season, Churchill are contracted to conduct seventy-two cleans; a schedule of the 2023 visit dates and times has been collated. The Victoria Park Tennis pavilion requires an additional weekly clean, as stipulated in the contract.

As part of the site inspections undertaken by the Sports Assistants, all taps and showers are flushed for one minute. Toilets are flushed on every visit and sinks in cleaning cupboards are also flushed to prevent legionella. One record had been labelled as 2022 but filed in the 2023 folder. It was also found that the same check sheets had been filed under the Harbury Lane, Newbold, Victoria Park bowls and Victoria Park tennis pavilions. The pavilions were last inspected on 20 February 2024.

Recommendation – Officers should be conducting separate pavilion inspection tests and recording these under the correct folder.

4.7 Other Risks

4.7.1 Potential Risk: Damage to new bowling greens from extreme weather or vandalism.

The team monitor weather conditions when the bowling green is in use, particularly during bowls competitions. The Sports Turf Research Institute (STRI) also conduct fifteen inspections per year to test the moisture content of the bowling green.

In wet conditions, cases of predicted rain or cases of high wind on the Edmondscote track or football pitches, clubs will be notified of the decision to cancel use and Churchill are notified that attendants are not needed during these times; Everyone Active are also informed so that outdoor changing rooms do not need to be opened.

Facilities are not formally covered by CCTV. The team are, however, working with the CCTV Operations Team Leader to get CCTV installed at the Newbold Comyn cycle hub.

Advisory – Consideration should be given to acquiring CCTV coverage at the bowls, track, and football facilities.

It should be noted that there is a serious understaffing issue with the bowls attendants. For the 2023 Bowls Nationals, there were only two staff on site. IDVERDE, at a minimum during normal season, are supposed to provide two FTE members of staff and arrange for support staff during championship periods, according to the contract. Historically, the need for Bowls Nationals coverage has been four personnel to ensure that the greens are in good shape throughout the event and that staff can take regular breaks. IDVERDE are not currently able to meet the contract in this respect. If the greens are left in a poor condition, this poses major reputational risk to the Council. Last year it fell to the STRI to inspect the greens throughout the tournament, but because the games were simultaneously being played during the inspections, only minor work could take place if needed.

Following a successful growth bid by the Neighbourhood Services Manager, there should now be five bowls attendants on site during the Nationals; however, there is currently just one attendant in situ. Generally, there is a lack of greenkeepers due to the specialist nature of the role. The Neighbourhood Services Manager is aware of the issue and is working with IDVERDE to recruit; however, with the forthcoming bowls season due to start next month, WDC may face the decision of having to close greens that have not been maintained, risking both Council reputation and income. The latest STRI report from March 2024 highlighted that staffing resources continue to present a considerable challenge to the success of renovations and routine green maintenance.

Recommendation – Prompt action should be taken regarding the acquisition of more bowls attendants, whether this be through an external procurement/consultancy exercise or by training up extra IDVERDE/WDC staff.

4.7.2 Potential Risk: Bowling greens not maintained in accordance with STRI guidance.

IDVERDE seed and top dress the areas on the green to smooth out surfaces prior to bowling events. IDVERDE are responsible for maintenance inspections of

the bowling greens and work in conjunction with the WDC Green Spaces team and STRI to rectify any issues. STRI conduct monthly surveys on the conditions of the bowling green and report any repair or maintenance concerns to WDC. Any issues with the bowling green conditions are often reported directly to the S&LCM by the clubs using the facility such as Bowls England.

STRI also conduct soil condition reports and distribute these to the Neighbourhood Services Manager, Green Spaces team, Head of Assets and Head of Safer Communities, Leisure, and Environment. The Royal Leamington Spa Bowls Club are kept abreast of any advisory comments. Guidance is provided to the Sports and Leisure team by the LTA, Football Association and Bowls England. The S&LCM is also a member of CIMPSA (Chartered Institute for the Management of Sport and Physical Activity).

Financial penalties are in place if the greens are not maintained to the required standard. A rectification notice is issued, and if the issue is not rectified within the timeframe specified, a default notice is then issued. Several faults were found on the bowling greens, including the failure to prune, edge the grass, and remove dead wood from the beds; rectification notices have been issued in all cases. The Contract Operations & Performance Officer advised that rectification notices are raised based on inspections by the Green Spaces or Sports and Leisure teams.

Bowling Greens are inspected monthly by the STRI to assess agronomic conditions, collect performance measurements, and review early season conditions. The data is collated in a report and issued to WDC including essential actions that should be taken to rectify the issues and prevent further problems. As part of this consultation, grass is cut from each of the greens and measured for soil moisture and smoothness. Photographs of site conditions are included, and data is extrapolated into graphs to show the relevant targets to be achieved.

Summary and Conclusions

- 5.1 Section 3.2 sets out the risks that were reviewed as part of this audit. The review highlighted weaknesses against the following risks:
 - Risk 2 Charges invoiced may be incorrect correct.
 - Risk 9 LDP roles and responsibilities are not reflective of staffing changes.
 - Risk 16 Risk assessments and the actions to be taken may be out of date.
 - Risk 17 Compliance works may not be completed; the contractor may be neglecting their duties to inspect football pitches.
 - Risk 18 Staff may not be providing evidence of inspections.
 - Risk 19 Severe lack of bowling attendants for forthcoming competition.
- Further 'issues' were also identified where advisory notes have been reported. In these instances, no formal recommendations are thought to be warranted as there is no significant risk attached to the actions not being taken.

- In overall terms, although several issues have been identified, because most of the issues are regarded as low risk (and none is high risk), we can give a SUBSTANTIAL degree of assurance that the systems and controls in place in respect of Leisure & Recreation Facilities are appropriate and are working effectively to help mitigate and control the identified risks.
- 5.4 The assurance bands are shown below:

Level of Assurance	Definition			
Substantial	There is a sound system of control in place and compliance with the key controls.			
Moderate	Whilst the system of control is broadly satisfactory, some controls are weak or non-existent and there is non-compliance with several controls.			
Limited	The system of control is generally weak and there is non-compliance with controls that do exist.			

6 **Management Action**

6.1 The recommendations arising above are reproduced in the attached Action Plan (Appendix A) for management.

Richard Barr Audit and Risk Manager

Action Plan

Internal Audit of Leisure & Recreation Facilities – April 2024

Report Ref.	Risk Area	Recommendation	Rating*	Responsible Officer(s)	Management Response	Target Date
4.2.2	Financial Risk: Risk of not obtaining potential income sources.	Business Administration Officers should include the breakdown of charges on all invoices, including any discounts awarded, to ensure that all fees charged are correct.	Low	Sports Assistant	Officer is aware; however, there is only one discounted fee authorised by the Portfolio Holder and an audit trail is available.	April 2024
4.4.3	Reputational Risk: Unable to meet Leisure Development Programme targets.	The LDP roles and responsibilities should be updated in light of staffing changes.	Low	Programme Manager	Much more detailed information sheets about each project are being compiled. This will be completed in conjunction with the new deputy Programme Manager, who is scheduled to start in May.	End of May 2024.
4.6.3	Health & Safety Risk: Accidents to staff and customers, serious injury, heart attack, loss of life at	The risk assessment relating to the Poplar trees at the Edmondscote athletics track should be reviewed and updated where appropriate.	Low	Sports & Leisure Contract Officer	Officer will update Assessnet in due course. Works are still ongoing with the trees.	September 2024

Report Ref.	Risk Area	Recommendation	Rating*	Responsible Officer(s)	Management Response	Target Date
	community pitches, sports events.	A) fire risk assessments should be completed by the Assets team in line with the specified timescales. B) the Sports & Leisure team should be ensuring that these risk assessments are completed.	Medium	Sports & Leisure Contract Officer; Sports Assistants.	Actions will be completed under our control. Other actions raised with the Assets team will be regularly chased and audit trails made available. Sports & Leisure Contract Officer to liaise with Health & Safety and Premises Manager as the Assessnet system is proving problematic in actioning tasks.	July 2024
4.6.4	Health & Safety Risk: Deterioration of playing surface leading to injury.	A) compliance works should be completed by the Assets team. B) the Sports & Leisure team need to ensure that these compliance works have been completed and update the compliance spreadsheet accordingly.	Medium	Sports & Leisure Contract Officer; Sports Assistants.	All actions under the Sports & Leisure Team's control have been completed; other items are the responsibility of the Assets team, who are being regularly communicated with; audit trails are available. Sports & Leisure Contract Officer to liaise with Health & Safety and Premises Manager as the Assessnet system is proving problematic in actioning tasks.	July 2024
		Staff should be reminded to file monthly and weekly inspections, where necessary.	Low	Sports Assistants	Inspections had been competed but were not filed correctly. Admin procedures will be addressed.	August 2024
		IDVERDE should be reminded of their contractual obligation to inspect the football pitches on a regular basis.	Medium	Contract Operations and Performance Officer	Sports Team will liaise Contract Services.	September 2024

Report Ref.	Risk Area	Recommendation	Rating*	Responsible Officer(s)	Management Response	Target Date
4.6.5	Health & Safety Risk: Legionella in operational buildings.	Officers should be conducting separate pavilion inspection tests and recording these under the correct folder.	Medium	Assets Team	Assets to provide reporting evidence; Sports& Leisure team to pursue.	May 2024
4.7.1	Other Risk: Damage to new bowling greens from extreme weather or vandalism.	Prompt action should be taken regarding the acquisition of more bowls attendants, whether this be through an external procurement/consultancy exercise or by training up extra IDVERDE/WDC staff.	Medium	Contract Services	After a successful growth bid, job adverts are out for four new employees. IDVERDE are being closely monitored in the meantime. Sports & Leisure Contract Manager and Neighbourhood Services Manager to monitor.	April 2024

^{*} The ratings refer to how the recommendation affects the overall risk and are defined as follows:

Issue of significant importance requiring urgent attention. Issue of moderate importance requiring prompt attention. Issue of minor importance requiring attention. High: Medium:

Low: