

**FROM:** Audit and Risk Manager  
**TO:** Head of Environmental & Operational Services  
**C.C.** Chief Executive  
Deputy Chief Executive (AJ)  
Head of Finance  
Parking & Ranger Services Manager  
Portfolio Holder (Cllr Rhead)

**SUBJECT:** Car Parking  
**DATE:** 11 November 2021

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## 1 Introduction

- 1.1 In accordance with the Audit Plan for 2021/22, an examination of the above subject area has recently been completed by Nathan Leng, 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 The Council is responsible for the management, maintenance and enforcement of parking controls across multiple off-street car parks within the district.
- 2.2 Responsibilities of the service include; proposing variations to the charges for the use of off-street parking places, ensuring sufficient parking capacity is available to meet demand, advertising parking provision, monitoring and maintaining car park machinery and infrastructure along with developing car park areas to meet the changing needs of the service.

## 3 Objectives of the Audit and Coverage of Risks

- 3.1 The audit was undertaken to test the management and financial controls in place.
- 3.2 This was achieved through a 'risk-based audit' approach whereby key risks are identified and then processes are assessed to provide assurance that the risks are being managed effectively. This approach has been in place by WDC Internal Audit since only the start of this financial year following an external review of the function.

- 3.3 In terms of scope, the audit covered the following risks:
- Parking charges are set at inappropriate rates resulting in insufficient income.
  - Income goes uncollected, is lost or stolen.
  - Staff and public claims for incidents or accidents.
  - Non-compliance with health and safety regulations.
  - Staff have not gained the essential training qualifications needed to carry out their duties.
  - Enforcement and recovery processes are not conducted in line with legal and regulatory standards.
  - Car parking areas and machinery are not properly maintained and appropriately updated.
  - Car parking provision is not sufficient to meet public needs.
  - Car parks are not used for their intended purpose.
  - Car parks are not promoted effectively.
  - Internal theft of cash.
  - Scammers steal legitimate parking income, scamming the public with illegitimate charges and stealing bank details to perpetrate fraud.
  - False overtime claims are submitted by staff.
  - Staff and members of the public are exposed to hazardous materials.
  - Staff are subject to harm from verbal or physical abuse and intimidation.
  - Staff have not been trained appropriately to carry out their duties.
  - Risk assessments are not up to date or available to staff.
- 3.4 These were drawn from a combination of risks identified in discussions with the Parking and Ranger Service Manager (PRSM).
- 3.5 These risks, if realised, would be detrimental to the Council with regards to the meeting of the following corporate objectives as set out in the Fit for the Future Strategy:
- Green, Clean, Safe – Total carbon emissions within Warwick District are as close to zero as possible by 2030, improved air quality, low levels of crime and ASB.
  - Infrastructure, Enterprise, Employment – Improved performance/ productivity of the local economy.
  - Effective Staff – All staff are properly trained and all staff have the appropriate tools.
  - Maintain or Improve Services – Focusing on our customers' needs, continuously improving our processes and increasing the digital provision of services.
  - Financial Footing over the Longer Term – Better return/ use of our assets, full cost accounting, continued cost management and seek the best value for money.

## 4 Findings

### 4.1 Recommendations from Previous Reports

- 4.1.1 The current position in respect of the recommendation from the audit reported in 2019 was also reviewed. The current position is as follows:

Recommendation	Management Response	Current Status
1 Inventories should be updated and should include all items of valuable, portable or desirable nature (e.g. cameras, body cams and new handhelds).	All equipment inventories will be updated at least annually and variances referred to Insurance & Risk Officer.	Current management advised that Finance hold an inventory document for valuable items and equipment which is updated annually.

## 4.2 Financial Risks

### 4.2.1 Parking charges are set at inappropriate rates resulting in insufficient income.

Changes to car parking fees were initially proposed in the Fees and Charges (F&C) report for consideration by members of the Council. The PRSM advised that not all charges are included in the report and that those omitted are discussed and agreed upon later in consultation with the relevant portfolio holder.

The proposed changes are written into a new Parking Order and shared with local stakeholders and regulatory bodies. Feedback collected from stakeholders is considered before the section 35(c) notice is widely publicised. Responses to the notice are responded to and, so long as the concerns are reasonably addressed, the variation in charges is enacted.

The current parking charges were confirmed during the Council meeting on 25 November 2020 and were formally updated on 5 April 2021.

Upon reviewing the F&C report, several inaccuracies were noted. This includes instances where charges and the charge timeframes for certain car parks are not an accurate representation of the charges at those locations. The PRSM advised that these would be amended before issuing the F&C report for 2022-2023.

#### **Recommendation**

#### **Inaccuracies in the Fees and Charges report should be corrected.**

Several inconsistencies were identified between the approved charges in the Section 35 notice, the Council's website and the charges issued on site or via Ring-go. Other inconsistencies were identified between the maximum stay timeframe and the charging timeframes. The PRSM was provided with a list of these issues during the audit. However, at the time of writing, some of the issues remain unresolved.

#### **Recommendation**

#### **The website should be updated to accurately reflect the approved charges and timeframes published in the Section 35 notice.**

## **Recommendation**

### **Parking information on the Ring-go application should accurately reflect the approved charges and timeframes published in the Section 35 notice.**

While there is no legal limit on the amount a local authority can charge individuals for using parking places, there are restrictions as to what money raised from parking charges can be used for.

Statutory guidance for local authorities advises that authorities should consider lower charges for off-street parking. It is believed that this will encourage drivers to park off-street, thereby reducing on-street congestion caused by vehicles searching for spaces. The Council's charges for off-street parking have been brought in line with on-street rates.

Government guidance also advises that income from parking should cover the cost of running the service without exceeding it.

From 5 April 2021, parking charge rates in most Council car parks increased. Sunday charging was also introduced where previously there had been no charge.

It was noted that the increase in parking charges was considered necessary to help reduce the annual deficit in car parking income. The deficit was exacerbated by the removal of parking charges during the height of the pandemic last year.

The deficit was evidenced in the 2020 F&C report which estimated a reduction in income of approximately £1.4 million for the year 2020/21 with the loss from car parking charges alone accounting for approximately £1.15 million.

A review of parking charges across different locations revealed a clear pricing strategy. Charges were highest in high-demand areas such as close to town centres. In areas of low demand, or where the Council are actively encouraging drivers to park, rates are considerably cheaper than the average rates across the Council's car parks.

There is currently some disparity between the rates charged in Leamington, Warwick and Kenilworth. The PRSM confirmed that future tariff structures would aim to homogenise charges between the different towns in the district. There is also consideration being given to aligning future tariff structures with Stratford District Council (SDC).

The reduced parking rates set for out-of-town parking provides affordable, long-term parking options for the community. The comparatively more expensive town centre and short-stay locations, limited to a maximum stay of four hours, provides immediate access to local amenities while also facilitating a quick turn-over and, therefore, providing space for more vehicles.

#### 4.2.2 **Income goes uncollected, is lost or stolen.**

Cash is collected from car parking machines (CPMs) by the contractor, Jade. Collections are scheduled every week on Monday, Wednesday, Friday and Saturday. When cash is collected, the contractor produces a collection ticket for each CPM which shows the amount of cash collected.

Each CPM uploads live information on the amount of income collected via cash or card payments. The information on daily cash payments processed via each CPM is recorded in a Cash Collection spreadsheet by the Parking and Ranger Service Team Leaders (PRSTL) the following day. The completed cash collection spreadsheet is then emailed to the Environmental & Operational Services Business Support Team.

The PRSTLs also complete a reconciliation between the information contained in the cash collection spreadsheets and the collection tickets provided by the contractor. This is completed the following day after the cash has been collected.

The Assistant Accountant (AA) responsible for reconciling parking income collected through the Ring-go application confirmed that reconciliations are completed monthly. A report of collected income is downloaded from the Ring-go website and these figures are reconciled to income received by the Council in the Paris System. A record of the Ring-go reconciliations is saved internally, and the AA confirmed that no major discrepancies have been identified.

CPMs are inspected by a member of the Ranger service every day as part of the daily car park checks.

Rangers are trained in basic CPM maintenance and can resolve simple issues such as coin jams or replenishing ticket paper. For more serious defects or damage, Rangers can email the CPM provider, Metric Group Ltd, copying in the PRSTL, detailing the issue. The service level agreement with Metric stipulates a 48-hour repair timescale. However, the repair process can take longer than this if there are delays in replacement parts being delivered. When delays occur, the PRSTLs will chase Metric for updates.

The PRSTLs are also able to remotely monitor the status of each CPM through the Mi-Office system provided by Metric. The system provides centralised remote management of all the Council's CPMs allowing the PRSTL to actively identify faults and arrange remedial action.

In some situations, a fault is reported by a car park user calling the Ranger office. Details of the report are recorded in a spreadsheet. Reported issues are either verified through the Mi-Office system or by physical inspection at the earliest opportunity. Once a fault has been verified, the appropriate repair procedures are enacted.

The estimated impact on collected income can be detailed in the spreadsheet for CPM faults. However, in most cases, the amount of money lost is nil as car park users use alternative machines or methods of payment.

Damage to a CPM due to criminal damage is reported to Metric for a quote for the repair or replacement. Details of the damage, the cause of the damage and the quoted cost are emailed to the Insurance and Risk Officer (IRO) to recover the costs.

Since August 2019, there have been three insurance claims relating to damage to and / or thefts from CPMs. In one of these instances, it took nine days to report the incident to the IRO.

However, according to the IRO, the time taken for information on claims for car park incidents and quality of the information received is generally good, so this instance is not thought to be an issue.

The Council are insured for cash income with a limit of up to £500 per loss for any money held in the Council's CPMs. In the break-in incident highlighted above, the £500 limit was claimed.

#### **4.2.3 Staff and public claims for incidents or accidents.**

Public injury claims are covered under the Council's public liability cover. Staff injury claims are covered by the Council's employers' liability cover. If a staff accident resulted in permanent injury, the claim is covered under the Council's personal accident cover.

Staff injuries sustained while in a vehicle are covered by the relevant vehicle insurance. If the injury was the result of poorly maintained roads and walkways, the claim is made against the highway authority.

The IRO confirmed that the PRSTLs are responsible for reporting issues and the information is usually conveyed via email in a timely manner.

Where details have been omitted or additional information is required, the IRO will request additional information from the PRSTL.

As part of this audit, an examination of insurance claims records dating from August 2019 was undertaken. A claim was identified wherein it was found that details about the perpetrator were not obtained at the time of the incident. According to the IRO, this can result in delays and make it harder for the insurer to recover their costs.

The IRO advised that Ranger staff have received no instruction on the information needed to support insurance claims. However, despite the incident outlined above, the IRO is generally happy with the information provided by the Car Parking service.

### **4.3 Legal and Regulatory Risks**

#### **4.3.1 Non-compliance with health and safety regulations.**

The Health and Safety Executive (HSE) recommend that regular physical inspections should be undertaken at different times of the day and in different weather conditions.

Under the Health and Safety at Work Act (1974), car park owners and contractors operating car parks on their behalf have a responsibility to ensure that car parks are safe to use. Failure to manage car park facilities can result in serious incidents and even fatalities. If found liable, the Council could face large fines.

All ancillary equipment should be subject to appropriate inspection and maintenance procedures (e.g. gates, barriers, lighting, CCTV, payment machines etc). All car parks are inspected daily during Ranger patrols and machinery is continually monitored through the Mi-Office system by the PRSTLs.

Car park checks are included in periodic Ranger 'beats' but are not scheduled for any specific time. The checklist form includes a note that lights must be checked during the night.

Rangers follow and complete a checklist form when conducting on-site inspections of car parks. This form contains checks for machinery, signage and health and safety checks as recommended by the HSE. The form focuses on car parking infrastructure and does not include checks for appropriate use. However, Rangers are expected to conduct these checks as well.

A completed form should include the name of the car park and the date the inspection was conducted but at present, does not include information on the time the inspection was conducted or the name of the staff member who carried out the inspection.

Updating the car park checklist to include appropriate use checks, such as carelessly parked vehicles, would ensure these considerations are checked as part of daily inspections. It would also create a record of issues that do not result in a PCN.

### **Advisory**

**Consideration should be given to updating the Car Park Check List form to include fields for the time of day the inspection was carried out, the staff member who conducted the inspection and include checks for appropriate use of the car park.**

At present, the car park checklist is a paper form. In line with the Council's environmental policy of moving operations to a paperless format where possible, converting these checklists to a digital format would help support the Council's green agenda.

### **Advisory**

**Consideration should be given to digitising the Car Park Check List form.**

Good 'housekeeping' is regarded as important to ensure obstructions, litter or environmental factors do not create risks to health and safety.

Cleaning of car parking areas is conducted daily by the contractor, Churchill. Ranger staff are not responsible for cleaning but will remove minor non-hazardous waste from car parks as part of their inspection checks.

Risk assessments should be carried out to assess personal safety, access requirements, location, physical features, and management procedures. Car park areas should be subject to a fire risk assessment under the Regulatory Reform (Fire Safety) Order (2005).

Up-to-date risk assessments for all Council car parks are available on the AssessNet portal. These include fire risk assessments for all multi-storey car parks.

Local authorities are required under the Local Government Transparency Code (2015) to publish on their website or place a link on their website to this data if published elsewhere, a breakdown of income and expenditure on the authority's parking account. They must also publish a breakdown of how the authority has spent a surplus on its parking account.

A review of the Council website revealed that annual parking reports have not been published since 2012/13.

### **Recommendation**

**Annual parking reports should be published each year. Missing reports should be generated and published on the Council website.**

#### **4.3.2 Staff have not gained the essential training qualifications needed to carry out their duties.**

The British Parking Association (BPA) recommend staff working in parking complete the nationally accredited Waste Management Industry Training and Advisory Board (WAMITAB) qualification.

The PRSM confirmed that all Ranger staff members should attain this qualification when commencing employment with the Council. However, there was some confusion about who holds the records of these qualifications and they were subsequently not located during this audit.

The PRSM confirmed that both PRSTLs should hold the Institute of Leadership and Management (ILM) level 3 qualifications. However, as above, evidence of these qualifications could not be located.

The Learning and Development Manager (LDM) advised that a new Learning Management System is currently being developed which will enable individual employees to input information on their own training record.

### **Recommendation**

**Evidence of staff training should be collected in advance of the new Learning Management System being implemented so that managers can confirm all staff have the requisite training and qualifications.**

The former Health and Safety Officer (HSO) confirmed that all but one of the current Rangers has received the Institution of Occupational Safety and Health (IOSH) Working Safely certificate. A training session was held the year after the Ranger joined the service, however, they did not attend.

### **Recommendation**

#### **IOSH Working Safely training should be booked for all staff without certificates.**

The HSO also confirmed that both PRSTLs have received the IOSH Managing Safely certificate.

IOSH no longer mandate refresher training every 3 years but continue to recommend it, although, it is now down to management discretion as to when it is necessary.

### **Advisory:**

#### **Consideration should be given to booking IOSH refresher training for all staff without certificates awarded within the last three years.**

Both PRSTLs attended a COVID Marshal training session from the Chartered Institute of Environmental Health in 2021.

Upon joining the Ranger service, staff receive on-the-job training. Paper records of this training are retained in folders within the Rangers office. New staff work alongside and under the supervision of experienced colleagues until they are sufficiently competent and confident in the role.

#### **4.3.3 Enforcement and recovery processes are not conducted in line with legal and regulatory standards.**

The enforcement of Penalty Charge Notices (PCN) is conducted by Ranger staff acting as parking enforcement officers. All parking enforcement is conducted in line with statutory guidance contained within the Traffic Management Act 2004.

The rate of PCNs is agreed by the Council and published on the Council website. Clear signage at car parking locations details the conditions users must adhere to to avoid being issued a penalty charge.

A higher charge is issued for contraventions deemed more serious in terms of the level of disruption caused. All charges can be paid at a 50% discounted rate within the first 14 days after the PCN has been issued.

PCNs are issued in person by a member of the Ranger service in response to active non-compliance with car parking rules. Evidence collected at the time and a charge notice is either handed to the alleged offender or fixed to the offending vehicle.

Ranger staff are required to wear appropriately descriptive uniforms when performing car parking enforcement activities.

Alleged offenders are allowed to informally challenge a car park PCN within 28 days of the PCN being issued or submit a formal representation after the 28-day mark. If these representations are unsuccessful, the alleged offender can appeal to the Traffic Penalty Tribunal (TPT) for independent adjudication. Information on all these options is available on the Council website.

The Council sends three reminder letters to alleged offenders. If no payment is received or grounds filed, the debt is registered with the county court and an Order of Recovery is sent as a final notification before bailiff action is requested. The Council will then apply to the county court for a warrant of execution and the warrant will be sent to the debt recovery agency, Bristow and Sutor, to recover the debt.

#### 4.4 **Reputational Risks**

##### 4.4.1 **Car parking areas and machinery are not properly maintained and appropriately updated.**

The PRSM advised that improvements to car park facilities and infrastructure are organised through the Assets team, with communication done via email.

The PRSM also advised that Assets conduct periodic digital car park checks, with checks carried out in the summer and winter to comply with HSE. Assets maintain car park infrastructure as part of a five year planned preventative maintenance programme for repairs and maintenance.

Examples of recent updates to car parking infrastructure made in response to changing public needs include the introduction of Ring-go payments and electric vehicle charging points.

##### 4.4.2 **Car parking provision is not sufficient to meet public needs.**

The PRSM advised that providing sufficient car parking capacity is not considered an issue facing the service at this time.

However, high public demand during the recent electric vehicle parking permit trial demonstrated the desire for additional provision of facilities for electric vehicles. Social media feedback also revealed some demand for 'rapid' electric vehicle charging facilities in Council car parks as opposed to the current 7KW provision. The PRSM advised that the installation of rapid charging points does not provide value for money at this time.

The current provision of electric charging points is likely insufficient, although, increasing the provision of electric vehicle charging points is a strategic objective of the service.

Other considerations for car parking provision centre around balancing environmental considerations with support for the local economy. For instance, providing attractive charging rates in the larger out of town 'park and stride' car parks to help reduce congestion and improve air quality within the town centres.

Public surveys are used to assess the impact of changes to car parking provisions. For example, the St Mary's Lands car park survey was used to explore and learn about public parking preferences in response to the closure of a town centre multi-storey car park.

#### 4.4.3 **Car parks are not used for their intended purpose.**

Car parks are regularly monitored. There are daily Ranger inspections and continuous CCTV monitoring to quickly identify any instances of non-compliance.

Parking infractions, where users have either failed to pay for their stay or have failed to park per car park rules, result in a PCN. Signage is displayed in all car parking locations explaining the rules and consequences for non-compliance.

Other instances of non-compliance are reported to PRSTLs who contact relevant Council services to escalate and resolve the issue. For example, a recent incident where a local business made unauthorised use of a car park for waste disposal was escalated to Estate Management to resolve.

The Council offers licences for some non-traditional car park use. For instance, placement of waste skips or use for a special event. Information and applications for non-traditional use can be found on the Council's website.

#### 4.4.4 **Car parks are not promoted effectively.**

Car park provision is advertised via the Council's website and on-street signs within the vicinity of the car park. Pop-up signage is used to identify spaces during periods of high demand such as local sporting events or music festivals.

A review of the information contained on the website identified some out of date information and infographics. Areas of the website which require updating were brought to the attention of the PRSM during the audit. Minor errors and omissions were quickly rectified and the development of new infographics and revamping of other visual information was initiated.

Overall, the depth and quality of car parking information on the website is sound. However, the development of a process to update and validate website information periodically could help to prevent outdated information from remaining on the website.

#### **Advisory:**

#### **Consideration should be given to developing a procedure for reviewing and updating website information.**

The use of social media resources to communicate car parking information is effective. Posts including information on car parks are timely, informative and widely received, as evidenced by the generally high response and interaction rate. Queries and comments on posts are passed to the Car Parking service and responded to, by the Media team, in a timely fashion.

#### 4.5 **Fraud Risks**

##### 4.5.1 **Scammers steal legitimate parking income, scamming the public with illegitimate charges and stealing bank details to perpetrate fraud.**

The PRSM advised that, due to the move towards card and app-based payments, the risk of traditional car parking scams is considered low.

The PRSM advised that the service do not keep car park users informed of malicious techniques to scam or defraud them but would do so if a plausible risk was identified that current controls could not account for.

#### 4.6 **Health and Safety Risks**

##### 4.6.1 **Staff and members of the public are exposed to hazardous materials.**

Cleaning of multi-storey car parks is carried out daily by the cleaning contractor, Churchill. Ranger staff are not responsible for cleaning but will remove minor non-hazardous waste from car parks as part of their inspection checks.

If hazardous materials are identified by Ranger staff, they notify the PRSTL who arranges for a rapid response unit to remove and dispose of the waste before sanitising the area.

##### 4.6.2 **Staff are subject to harm from verbal or physical abuse and intimidation.**

Ranger staff adhere to the guidance set out in the Lone Working policy when working remotely. This includes informing office colleagues of the location(s) they plan to visit and the expected time of return as well as carrying a work mobile phone as a means of remote contact.

Rangers also adhere to a locking up and lone working procedure stored in a folder within the Ranger office.

Rangers are provided with body cameras to document incidents and to serve as a deterrent to anti-social behaviour.

##### 4.6.3 **Risk assessments are not up to date or available to staff.**

The Council's AssessNet Health and Safety management portal contains risk assessments covering all Council car parks, fire risk assessments for multi-storey car parks, ranger and team leader risk assessments as well as COVID-19 risk assessments for all car parks. All documents are up to date and contain the relevant risks, controls and ratings.

The AssessNet portal is accessible to all staff as a central repository for health and safety and risk assessment information and can be referred to as and when required.

## 5 Conclusions

5.1 Following our review, in overall terms we are able to give a MODERATE degree of assurance that the systems and controls in place in respect of Car Parking are appropriate and are working effectively to help mitigate and control the identified risks.

5.2 The assurance bands are shown below:

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

5.3 There are some issues that require further action:

- The Fees and Charges report contains some historical inaccuracies that should be removed/updated.
- The charges and timeframes published on the Council's website are not all accurate and should be updated.
- The charges and timeframes published on the Ring-go application are not all accurate and should be updated.
- Annual parking reports should be published to the Council's website. Reports from previous years should also be generated and published.
- Records and evidence of staff training should be collected.
- Staff without IOSH Working Safely training certificates should be booked on a training session.

5.4 Further, more minor, 'issues' were identified where advisory notes have been reported. In these instances, no formal recommendations are thought to be warranted and addressing these issues are discretionary on the part of the service.

## 6 Management Action

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

Richard Barr  
Audit and Risk Manager

## Action Plan

## Internal Audit of Car Parking – November 2021

Report Ref.	Risk Area	Recommendation	Rating*	Responsible Officer(s)	Management Response	Target Date
4.2.1	Financial Risks - Parking charges are set at inappropriate rates resulting in insufficient income.	Inaccuracies in the Fees and Charges report should be corrected.	Low	Parking and Ranger Service Manager	Fees are set in line with recommendations from SMT.	01.05.22
4.2.1	Financial Risks - Parking charges are set at inappropriate rates resulting in insufficient income.	The website should be updated to accurately reflect the approved charges and timeframes published in the Section 35 notice.	Low	Parking and Ranger Service Manager	Website will be updated at the appropriate time.	01.01.22
4.2.1	Financial Risks - Parking charges are set at inappropriate rates resulting in insufficient income.	Parking information on the Ring-go application should accurately reflect the approved charges and timeframes published in the Section 35 notice.	Medium	Parking and Ranger Service Manager	Ring-go information to be updated accordingly.	01.01.22
4.3.1	Legal & Regulatory Risks - Non-compliance with health and safety regulations.	Annual parking reports should be published each year. Missing reports should be generated and published on the Council website.	Low	Parking and Ranger Service Manager	Reports to be published.	01.05.22

<b>Report Ref.</b>	<b>Risk Area</b>	<b>Recommendation</b>	<b>Rating*</b>	<b>Responsible Officer(s)</b>	<b>Management Response</b>	<b>Target Date</b>
4.3.2	Legal & Regulatory Risks - Staff have not gained the essential training qualifications needed to carry out their duties.	Evidence of staff training should be collected in advance of the new Learning Management System being implemented so that managers can confirm all staff have the requisite training and qualifications.	Low	Parking and Ranger Service Manager	Training to be recorded appropriately.	01.12.21
4.3.2	Legal & Regulatory Risks - Staff have not gained the essential training qualifications needed to carry out their duties.	IOSH Working Safely training should be booked for all staff without certificates.	Low	Parking and Ranger Service Manager	IOSH course to be booked accordingly.	01.04.22

\* The ratings refers to how the recommendation affects the overall risk and are defined as follows:

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