



INTERNAL AUDIT REPORT

FROM: Audit and Risk Manager
TO: Head of Place, Arts & Economy
C.C. Chief Executive
Programme Director for Climate Change
Head of Finance
Business Manager Projects & Economic Development
Business Support & Events Manager
Portfolio Holder (Cllr Billiald)

SUBJECT: Events Management
DATE: 9 April 2024

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 The Events team manage approximately 160 events each year. The number of events held in the district has grown exponentially, with 2023 holding the highest record of events (155) and a predicted 167 events to be held in 2024.
- 2.2 Since the last audit was conducted, event fees and charges have been introduced which organisers must pay in order to hold an event in the district; this has resulted in a more stable income for the service. The Events team also manage the markets and Mop fairs, promotional stands, the Safety Advisory Group, filming applications, and various event-based contracts.

3 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/excessive event costs.
 2. Potential for financial loss through cash handling procedures.
 3. Failure to maximise potential income from events.
 4. Risk of contractor going into administration or deciding to withdraw from the contract.
 5. Legislative requirements not complied with/contracts not complied with.
 6. Inappropriate insurance cover in place.
 7. Ineffective risk assessment planning.
 8. Events not sustainable/in line with District's ambition to be carbon neutral.
 9. Events not meeting desired outcome resulting in adverse publicity of events.
 10. Events not advertised or advertised incorrectly resulting in low turnout.
 11. Potential damage to Council green spaces/parks etc.
 12. Ineffective working with town centre partnerships and other organisations.
 13. Failure to manage or appropriately support events within the district.
 14. Unauthorised access to buildings/parks.
 15. Potential of funding or bribery for special treatment.
 16. Risk of a major incident not responded to effectively.
 17. Acts of terrorism/violence/threats against staff/general public.
 18. Accidents causing death or injury.
 19. HSE/Safety Advisory Group intervention.
 20. Unavailability of staff/lack of staff resources to meet event demands.
- 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 Place, Arts and Economy and Significant Business Risk Registers have also been reviewed.
- 3.4 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 create vibrant, safe, and healthy communities to support both the daytime and nighttime economies.

4 Findings

4.1 Recommendations from Previous Reports

- 4.1.1 The current position in respect of the recommendations from the previous audit undertaken in March 2020 was also reviewed. The current position is as follows (overleaf):

Recommendation	Management Response	Current Status
<p>A penalty should be established for markets that go ahead without approval.</p>	<p>This will form part of a bigger piece of work that is going on to rejuvenate the markets. The Market policy and the pricing structure are all being looked at. As part of that review, and in light of emerging CV-19 plans to restart the markets and events once it is appropriate to do so, we will consider the merits of a penalty for markets operating without permission.</p>	<p>The Business Support & Events Manager advised that this recommendation is no longer relevant as there have been no unapproved markets.</p>
<p>An appeals process should be established to allow organisers the opportunity to appeal, should permission be denied.</p>	<p>Part of the same piece of work mentioned above. The whole process of new markets needs looking at and the practicalities of this recommendation will be considered in light of the overall markets review.</p>	<p>The Business Support & Events Manager advised that it is rare for an event to be denied permission. Any events that are denied permission are provided with reasons to justify this. Market stallholders that are refused permission are advised to take this up with the event's organiser, CJ's Events. Stallholders will usually be denied permission if the produce is not in keeping with the rest of the market.</p>
<p>The markets policy should be publicised appropriately to create awareness of it amongst organisers and venues within the district.</p>	<p>The Business Support & Events pages on the website are being reviewed and improved. We have already started benchmarking with other councils. This work is underway and will form part of the overall Departmental and Council wide restart of events and markets post the current CV-19 crisis.</p>	<p>There is a Markets Policy in place which is available on the WDC website; this is currently being updated to reflect the current markets.</p>

Recommendation	Management Response	Current Status
The status of the Operational Agreement as a true license document should be clarified with legal advice and documented for future reference.	This is a long-standing issue and as part of this report, the Team Manager will ensure sure that this is looked over by our legal team.	An operating agreement is in place for the Mop fair. This covers all terms and conditions regarding operating hours, maintenance and health and safety.
Payment of bonds or deposits specified in contractual agreements should be followed and incorporated into a procedure document for future staff to follow.	This process does need to be re-enforced and implemented. This may be as simple as taking a cheque and holding it in our safe until the mop is finished and then returning it or cashing it depending on any damages. The BSE Team Manager will discuss this with our legal team.	Testing by the auditor conducted during the 2023/24 audit found that this had not been enforced. The Business Support & Events Manager has advised that a procedure will be drawn up.
There should be clarification over the definition of "markets" and staff should be following the legislation as appropriate.	This will be looked at as part of the market policy and a map of the chartered area will be produced. Other councils that are affected by this charter will be contacted to make sure that they are aware of the area covered.	The Markets Policy provides a clear definition of the markets and includes a list of all the markets regularly taking place across the district.
The markets policy should be reviewed and updated accordingly.	As above.	See above – the policy is currently under review as of January 2024.
The role of the Events staff should be considered when reviewing the risk register to ensure appropriate measures are in place to reduce any risks relevant to them.	The risk register is reviewed regularly, and this will be raised as a risk and monitored going forward.	The current Place, Arts & Economy Risk Register has a separate list of risks dedicated to Projects and Economic Development (Events Management), which includes risks to Events staff.

Recommendation	Management Response	Current Status
A formal review of expenditure with suppliers should be undertaken by service managers, with the appropriate procurement practices being followed for all suppliers.	The Business Support and Events Team Manager has already investigated current and historic expenditure with suppliers and made some improvements. This work will involve close monitoring with the Procurement Team. It is recognised that this issue does not lie solely with events and markets.	This is ongoing with Procurement. As a result of over expenditure in the past, separate contracts have since been procured including contracts for Heras fencing, Markets, EcoFest and First Aid.
The Procurement team should be contacted immediately to discuss the issues over the expenditure with CJ's Events.	Have already spoken to Procurement and we are looking at ways that this element can either be included in an existing contract or the creation of a new contract to go out for tender.	Overspending has meant that multiple contracts with CJ's Events are now in place; a separate contract for markets and a separate contract for temporary barriers and fencing (plus stewarding and traffic wardens) has been procured.
The potential of charging for events should be explored. This will allow the team to maximise their income and reduce the current overspending of budgets. If it is decided to charge, a formal scale of fees and charges should be put in place.	This is already underway through conversations with the Portfolio Holder. We are conducting research on how other councils charge. We are also listing the events we have and what it currently costs the council to run these. Current year budgets have been uplifted to reflect the actual costs of events and markets, but it is recognised that the service area should look to maximise income and reduce expenditure for the Council going forward.	The charging of events is now in place and fees are published on the WDC website. Fees & Charges are subject to Member approval.

4.2 Financial Risks

4.2.1 Potential Risk: Insufficient budget/excessive event costs.

A number of purchase orders were collated through the Ci Anywhere contracts module and investigated by the auditor to check that charges had been correctly calculated; all cases in the sample were evidenced by legitimate purchase orders

which had been appropriately authorised. All invoice payments were due one week after the invoice was issued to Warwick District Council (WDC). Six of the eleven cases were paid to the contractors on time; four cases were, however, paid after the due date. Seven charges had been correctly loaded against the Events Management ledger code; however, three of these transactions had been coded against Housing Repairs, Community Safety and Environmental Protection. The Business Support & Events Manager (BSEM) advised that these were authorised to avoid overspend on other departmental budgets and were seen as acceptable, providing that the purchase order did not result in over-expenditure on the contracts. The Events Management team rarely use the Heras fencing contract and so other departments are authorised to spend against this.

One transaction coded against the Heras fencing contract related to a training event. Ideally, this payment should not have been recorded against the contract, but as the Events training budget was set to only £100, this transaction was authorised by the Business Manager for Projects and Economic Development (BMPED).

The Heras fencing contract costs are £33,000 per twelve-month period. Surcharges include the supply, installation and removal of Heras fencing for both the Green Spaces and Assets teams. The contract also includes the supply, installation, and removal of Hi-Viz barriers. Costs for the National Bowls car park management contract are £40,000 per annum with the total contract value amounting to £120,000 over three years. Expenditure thus far has only amounted to £46,505.88.

It was found that the market operator, CJs Events, had paid their 2023/24 license fee; however, several Warwick market fees for 2022 had only been partially paid.

Advisory – Consideration should be given to imposing stricter repayment times on market fees.

All expenditure over £250 is reported on the Council's website. Most of the Events Management expenditure relates to medical cover, lighting, artist fees or equipment. A number of event recharges were collated through Ci Anywhere and investigated by the auditor to check that these had been correctly calculated. All cases in the sample had the correct market fees charged. All invoices were issued fourteen days prior to their due date; however, only nine payments were received before the invoice due date. The remaining cases had either not yet been paid, had not been paid on time, or had been only partially paid. All charges were correctly uploaded to the relevant ledger on Ci Anywhere. A separate test was also conducted to check that the market fees charged matched the invoices raised. Market prices per stall are £33 for Kenilworth, £42 for Warwick and £48 for Leamington. The April 2023 invoice was for £4,298.18 despite calculations amounting to £4,094.55. Furthermore, the October 2023 invoice was for £10,574.26 despite calculations amounting to £10,574.25.

Recommendation - Staff should be reminded to check market calculations for accuracy before raising invoices.

The Events budget is reviewed annually and divided into funds for the National Bowls, Mops and Markets and Christmas Illuminations. The Events Management income for 2023/24 was £69,706.33 compared to £52,594.27 in 2022/23. Expenditure has reduced for Events Management from £408,656.23 in 2022/23 to £277,313.55 in 2023/24. The Mops and Markets expenditure has similarly reduced by £4,436.26; however, income has also diminished from £61,345.29 to £25,031.16. This is largely due to the fact that there was a period of approximately six months where the market contractor was not invoiced correctly. Subsequently, the contractor is behind on these payments; however, a monthly repayment plan has been put in place to combat this.

There are no set number of events that can be held throughout the year, although the Events team do have an income generation target to work towards; this was set at £35,000 for 2023/24. The Assistant Accountant advised that any income greater than targeted, is rolled into the Council's funds at the end of the financial year, as opposed to being put back into the Events Management budget. The BMPED meets with the Assistant Account frequently, although this tends to be on an as-and-when needed basis. The Head of Place, Arts and Economy meets with the Assistant Accountant on a more regular basis to review all budgets in the service.

4.2.2 **Potential Risk: Potential for financial loss through cash handling procedures.**

Ride operators at Christmas Light switch on events give the BSEM a portion of the cash that they have collected during the event and ask that this be donated to charity; an Event Officer is present at all times to check that the money handed over is correct. The BSEM then keeps this money until the end of the event period and passes the funds to the Corporate Support Team. Ideally, this should be handed over to the Corporate Support Team with immediate effect. The auditor found corroborating evidence on Ci Anywhere to show that £1,529 had been paid to the Chairman's charity, Myton Hospice, in January 2024. There is, however, no facility in which staff have to document their receipt of the money from the event organiser.

Recommendation – Any cash to be sent to charity should be signed by both the collecting officer and the authorising officer.

4.2.3 **Potential Risk: Failure to maximise potential income from events.**

Charges are administered to event organisers for holding events on Council land. If an event sits within one of WDC's parks or open spaces, the Events team also request a deposit to cover the cost of any damage to the grounds. All deposits and charges are discussed with organisers before the event is confirmed. The fees and charges for 2023/24 were agreed by Cabinet on 3 November 2022. Details about charges and deposits are advertised to event organisers through event application forms. Event charges are also included on the Council website. The scale of fees and charges applied are based on the size of the event, event location and type of event. There are three event categories: local/charitable community events, small/local commercial events, and large/national commercial events. Community events are defined as any event or festival organised by charities, community or voluntary groups that directly

benefit the residents and stakeholders of Warwick district. Commercial events constitute any event or activity that has a commercial benefit to a profit-making organisation.

Market fees and charges increased by 20% during 2023/24. Market figures for each month are populated by both WDC and CJs Events; the spreadsheet calculates the total monthly invoice to be charged to the market operator based on the number of stalls at each market. No income is received from ticketed events as the event organisers directly collect this income. Managers are not required to sign agreements with event organisers. It is up to the Events Officers or BSEM to decide if event agreements are completed to standard. The BSEM will, however, request senior sign-off on larger events where significant income is due.

A number of events were checked by the auditor to ensure that event fees had been correctly charged and received by the Council. It was found in eleven of the twenty cases sampled that the fees charged to the event organiser were more than the fees and charges agreed by Members, albeit by twenty-five or fifty pence. It has been confirmed by the BSEM that the team were working off the draft proposed 2023/24 charges and failed to update their charging schedule when the fees became fixed.

Recommendation - Staff should be checking their events monitoring spreadsheet to ensure that charges are reflective of the fees and charges set.

Fourteen of the payments charged were received in advance of the invoice due date. Four of these payments were late, with only one reminder letter being sent; two event organisers had not yet paid the sum due.

Advisory – Consideration should be given to reminding staff to chase unpaid invoices where relevant.

Event bonds are in place to ensure that the event organisers manage the sites to a high standard. WDC will return the bond in full if the expected standard is met. If costs to repair damage exceed the bond, the event organiser will be invoiced for any outstanding costs and permission will not be granted for future events. A bond will be refunded after the event assuming that the:

- Site is free of event litter.
- No damage has occurred to the venue.
- There has been no breaches of the parking and stall protocol.
- All keys have been safely returned.
- All WDC equipment has been returned, in the condition lent.

A £500 bond was only received in two cases sampled by the auditor. On all relevant samples, the charges were accurately reflected in Ci Anywhere, although one organiser had not paid, and legal action was being sought by the Finance team to recover the costs.

Recommendation - Bonds should be taken up front as part of every event and only refunded where no damage has occurred.

4.3 Legal and Regulatory Risks

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

KPIs have been written into several of the Events Management contracts. The KPIs in place for the supply of temporary barriers and fencing, (including stewards and traffic wardens) covers:

- Sourcing – the supplier is able to provide resources, staff, and equipment.
- Timing – the supplier can meet the project schedule issued and agreed ahead of each event.
- Quality – duties are carried out to the level specified.

These KPIs are expected to function at 100% service level, apart from 'sourcing' which has a target of 95%. If the Council considers that a KPI has not been met, then the supplier will be informed in writing and an acknowledgement is required within twenty-four hours. If a single KPI is not achieved on more than three consecutive occasions, or three KPIs are not achieved within a twelve-month period, the Council reserves the right to terminate the contract for non-performance. The BSEM did, however, advise that currently, there are no formal methods in place for monitoring contract KPIs.

Recommendation – Contract KPIs should be formally monitored.

The National Bowls contract also contains KPIs regarding staffing and quality, ensuring that the number of staff required is agreed with the Council and that duties are carried out to specification. The service level target for these is 100% and the criteria for measurement and implementation is included in the contract. The supplier is expected to perform its services with all reasonable care, skill, and diligence, and in accordance with good industry practice. All persons providing the service should have the qualifications, skills, and experience necessary. The supplier is also expected to reimburse the Council for all reasonable costs incurred which have arisen as a direct consequence of the contractor's inability to meet these specifications.

Currently, any damage incurred by event organisers is being paid by the Council, reiterating the need for event bonds to be more heavily enforced.

Advisory – Consideration should be given to compiling a specific budget for either the Events or Green Spaces team to use on repairs required in parks and open spaces following events. This would minimise the administrative time that is currently spent moving monies between the various budget codes.

The market terms and conditions stipulate that the market operator should have a Business Continuity Plan (BCP) in place; the contracts with Event Support Team Ltd and Wilsons Amusements also stipulate this. The BSEM advised, however, that BCPs are not regularly provided.

Recommendation – BCP’s from contractors should be provided on a yearly basis.

Events are covered under the WDC Emergency Planning Policy and Emergency Management Plan. As part of event planning, a member of Warwickshire Police Tactical Planning and Resilience provides advice to the Events team. Foreseeable events can be predicted to such a degree that specific contingency plans can be developed, particularly for entertainment events such as large music concerts, food festivals and sports events.

4.3.2 Potential Risk: Legislative requirements not complied with/contracts not complied with.

There are several contracts in place under the Events Management service. There are two contracts in place with CJs Events Warwickshire Ltd, one of which is for the supply of temporary barriers, fencing and stewarding. Contract spend has amounted to £9,215.75 from an approved limit of £165,000. The contract includes the deployment of traffic management infrastructure and marshals for Christmas Light events, national remembrance events and the Warwick Mop and Runaway Mop fairs.

The contract in place with Event Support Team Ltd is for the management of the National Bowls car park; this is due for renewal in July 2025. The contract includes monitoring the gates to the park, checking that the car park is fit for use prior to opening, and checking that the area to be used is clearly marked. Event Support Team Ltd are required to ensure that gates open on time and staff are in attendance, ready to greet visitors and issue parking tickets as appropriate. Although the contractor is also supposed to conduct daily assessments on the condition of the ground, the BSEM advised that this does not take place.

Advisory – Consideration should be given to reminding Events Support Team Ltd to formally document ground conditions during the bowls season.

The second contract in place with CJs Events Warwickshire Ltd is for the operation of markets across the district; this contract is due for renewal in June 2025. The contract with Wilsons Amusements for the Warwick Mop is also due to expire in 2025. There is a small contract in place with the Slate Art Gallery Ltd for the provision of an events coordinator during EcoFest. This contract is due to expire in March 2024; expenditure is minimal, however, with only £4,200 having been spent against an approved limit of £20,000.

There is a license in place for the Mop extending back to 2015. The Mop license contains certain conditions, including storing generators away from residential dwellings and maintaining a clean and tidy area. Road closures ensure that roads are left clear for emergency vehicles, although the BSEM advised that the position of generators and fire hydrants are not specifically checked for compliance.

Advisory – Consideration should be given to reviewing the position of generators and fire hydrants during pre-Mop inspections; a map of fire hydrant position should be obtained from Fire Services.

Advisory – Consideration should be given to reviewing the Mop agreement every year to check that it is accurate and up to date.

Funfair organisers are expected to provide both a risk assessment and a list of all the vendors due to attend the fair. ADIPS is an organisation that certifies the safety of fairground and amusement park rides, including recent checks, faults, and ride conditions. All owners of any amusement device must produce current written evidence of a thorough examination carried out by ADIPS; this was found to be the case across the sample. Funfair organisers are also responsible for ensuring that vendors comply with the Food Safety Act 1990. Meetings are held with the funfair organisers before the event takes place; however, it is unknown as to what rides the amusement company will provide and so the Events team can only give a brief indication as to which spaces the organiser can use. The organisers are reminded of how close vehicles can be parked next to perimeters and trees during these meetings.

There is a WDC Markets Policy in place; WDC is the proprietor of Warwick Charter Market and has the right to protect it from competing markets. Under Section 37 of The Local Government (Miscellaneous Provisions) Act 1982, any person or organisation intending to hold a temporary market or car boot sale within the district must give notice to WDC. When accessing sites, stewards are required to control all access points and direct vehicles safely into position. Stewards should also remind drivers of WDC's parking and stall protocols.

Filming and photography in public is permitted unless the landowner in question requires permission to be obtained in advance. Where an event is being filmed, then a licence or permit may be required and there is a charge of £1000 per full day or £500 per half day for any filming in the district for commercial purposes. Exceptions are made for charities, students, schools, and news interviews. Filming income has, however, somewhat diminished due to the recent writers strikes. Filming applications are complex, because there is no clarity as to whether the land being used should have authorisation from WDC or Warwickshire County Council (WCC). WDC is only permitted to grant permission to film on their own land which does not include highways and pavements. There were just three filming applications during 2023 that could be tested during the audit. The auditor was only able to find one of these applicants listed as a debtor on Ci Anywhere; however, the debtor had paid the filming fee two weeks in advance of the due date.

Recommendation – A list should be compiled of areas in which WDC can give permission to film and those areas which require permission from WCC.

As part of an event plan, each event organiser is expected to produce a completed risk assessment. Due to the subjective nature of events, it is difficult to have a one size fits all approach. The WDC website provides links to the events manual and risk assessment templates. The Events team follow a set process when requesting documents and evaluating risk. The event level will

influence what is required of the organisers, with the demands being more complex the higher the level. All events are assessed based on the size and impact that they might have, from level one to three (one being a small event and three being a larger event). Each level requires a different amount of documentation to be supplied in order to support it.

Events are monitored through a spreadsheet which details the location, event dates and contact details of the event organiser. The spreadsheet also serves as a checklist to ensure that the correct fees have been charged and raised on Ci Anywhere and bonds or licences have been received. Following consultation, the spreadsheet also outlines if extra services are needed such as street cleaning, grass cutting or standpipes.

4.3.3 **Potential Risk: Inappropriate insurance cover in place.**

Event organisers have to provide copies of their own public liability insurance. These are often passed to the Council's Insurance and Risk Officer who checks that they are sufficient. If they are deemed insufficient, the Events team are asked to advise the organiser to incorporate certain elements of coverage in the insurance that may have been missed. The Council has up to £25,000,000 of public liability insurance for any one event. WDC also have their own premises license for smaller events which covers the Pump Room Gardens, St Nicholas Park, Abbey Fields, Castle Farm, Newbold Comyn, Jephson Gardens, Mill Gardens, Victoria Park, the Eagle Recreation Ground and the Edmondscote athletics track.

A number of events were investigated to check that valid insurance had been provided to the Council. In nineteen of the twenty cases sampled, a copy of the insurance certificate had been provided to WDC and was held on the network files; in two cases, the insurance provided was out of date. In nine cases, a copy of the insurance had been provided three months in advance of the event and two had insurance certificates provided within two months. The remaining seven cases had insurance certificates provided in less than one month before the event. All organisers across the sample had at least £5 million indemnity cover in place.

Advisory – Consideration should be given to reminding event officers to ask organisers for copies of insurance at least three months in advance of large events and one month in advance for smaller events. Ideally, insurance should be uploaded as part of the application process.

Recommendation - Insurance should be thoroughly checked to ensure that the date is valid to cover the event. In cases where it is out of date, an updated insurance certificate should be requested.

The Insurance and Risk Officer advised that any equipment used by the events team is not insured under the Council, as there is no record of the equipment or valuables used. To date, no event equipment has been stolen, lost or damaged.

Advisory – Consideration should be given to compiling an inventory of event equipment.

4.3.4 **Potential Risk: Ineffective risk assessment planning.**

The Events Management team do not have to be trained in risk management specifically, but they will consult with the Health and Safety team to check that organiser risk assessments are completed to a suitable standard. A risk assessment template is provided to event organisers in the event pack. Risk assessments are sent to various consultees including:

- BID Leamington
- WDC Emergencies and Resilience Lead Officer
- WDC Insurance & Risk Officer
- WCC Highways
- WDC Green Spaces
- Warwickshire Fire and Rescue
- Contract Services
- Head of Safer Communities, Leisure, and Environment.

A number of events were evaluated by the auditor to check that sufficiently detailed risk assessments had been completed as part of the event planning process. In nineteen cases, a risk assessment had been completed and saved to the relevant folders. Risk assessments should be completed three months before an event is due to take place; there were just two cases where this had not occurred. All risk assessments and event plans were sent out to consultation in advance of the event and the risk assessments had been authorised by the consultation group and Events team prior to the event. All relevant risk assessments in the sample had accidents and injuries suitably covered.

Advisory - Consideration should be given to reminding long-standing event organisers to complete updated risk assessments every year.

A number of events were also evaluated to check that vendor lists had been appropriately provided and that ride risk assessments had been performed. Although the funfair events sampled had up-to-date quality assurance checks in place to show that rides were up to standard, only one ADIPS was sent twenty-eight days before the event. There were no method statements or ride-specific risk assessments in place, although there were several health and safety, food safety and fire safety risk assessments. All fifteen events had a list of food vendors in the event management plan, or these had been provided to the Environmental Health Officer. Of the vendor lists provided, only three of these were not produced within twenty-eight days of the event. A license was in place on all twenty events, only one of which was provided less than ten days before the event.

Recommendation - All funfair organisers should provide either method statements or ride risk assessments in advance of events.

4.4 **Reputational Risks**

4.4.1 **Potential Risk: Events not sustainable/in line with District's ambition to be carbon neutral.**

Events showcase the vibrant opportunities the area has to offer and deliver the Council's objectives to support local businesses and communities, generating economic growth for the region and its towns. The contract with CJs Events contains certain climate mitigations including:

- Efficient route planning for equipment and materials.
- Use of low carbon emission equipment.
- A sustainable and low carbon emissions supply chain.
- Recycling of waste and packaging initiatives.

The National Bowls contract also includes 'green' targets including:

- Communicating electronically to reduce the need for paper.
- No single use plastics.
- Use of electric vehicles, LED lighting.
- Recycle Policy in place.
- Electronic staff check-in via app.
- Customers book parking spaces online.
- Steward controlled handheld devices.

The Events Manual lists the ways in which event organisers can incorporate greener ways of thinking into their event plans. WDC advocate using recyclable and/or reusable sustainable products and materials and encouraging attendees to consider green ways of getting to the event. WDC has also adopted a Plastics Policy and where events take place on WDC land, these should be free of single-use plastic.

4.4.2 **Potential Risk: Events not meeting desired outcome resulting in adverse publicity of events.**

Occasionally, WDC receive feedback from residents regarding events. CJs Events have their own complaints policy in which feedback is encouraged in an informal manner before being escalated to WDC. CJs Events offer a ten-working day period to evaluate complaints and take the necessary actions to address any issues. Complaints are few and far between but usually revolve around the timing of road closures, the condition of the pavements or refuse collection. As a result of this, a review of the markets is due to take place in 2024. It should be noted that the team often receive complimentary feedback from Members and the general public regarding successful events.

Whilst WDC do not explicitly ask the public for feedback, they will provide feedback to the event organisers. A number of events were evaluated by the auditor to check that any event feedback or complaints received had been dealt with appropriately. Only six events had received feedback, five of which related to damage. Feedback was provided to the organiser by WDC in only three cases. Eight events received complaints varying in nature, from environmental impacts and noise complaints to security and lack of parking. In four cases, the complaint was passed to the event organiser; two complaints were dealt with during the event.

4.4.3 **Potential Risk: Events not advertised or advertised incorrectly resulting in low turnout.**

Events are advertised to local businesses through the Media team and the Council's 'What's on Guide', either electronically or in hard copy. Hardcopies were stopped during COVID, although these are now back in use and delivered to libraries and businesses of local interest e.g., hairdressers, cafes etc. It is part of the market contract with CJs Events that promotional activity will take place to support the markets being operated. There is no formal events strategy in place, although this is being discussed.

Recommendation – A formal events strategy should be documented which includes a policy on the types of promotional/marketing stands permitted.

Events, markets, and Mop fairs are advertised through social media and the Council website. Event organisers, market and Mop operators also promote their own events to encourage visitors. Kenilworth, Leamington, and Warwick town centres are all conservation areas, and so they are protected in a number of ways. Banners promoting events in these areas are not normally permitted. There is also no ownership over who is responsible for removing these flyers after events. There are several locations where WDC have public notice boards for community or charity events use only.

A number of events were evaluated by the auditor to check that they had been actively promoted to members of the public. Ten of the twenty events sampled had been advertised on the WDC website. Sixteen events had been included in the 'What's On Guide' and although the Events team do not tend to promote events on social media, fifteen events were included on various social media platforms.

Advisory - Consideration should be given to making sure that all events are included on the WDC website and What's On Guide.

The BMPED advised that as part of the contract with Shakespeare's England, it is a condition of the grant provided by WDC, that Shakespeare's England promote WDC events. This has, however, not been taking place.

Advisory – Consideration should be given to reminding the Senior Economic Development Officer to work closely with Shakespeare's England in order to actively promote WDC Events.

4.4.4 Potential Risk: Potential damage to Council green spaces/parks etc.

There is a pre and post event site inspection form to be completed with event organisers before and after they access a site. It is designed to reduce the likelihood of the event organiser being held accountable for damages caused by other park users. Photographs should also be taken pre and post event during these site inspections. WDC Terms and Conditions are included in the event organisers pack.

No vehicles, amusements, property, or structures of any kind connected with the event shall be brought on to the site before the date and time specified in the event application. Vehicles are not permitted to park under tree canopies within the parks. Organisers are responsible for the security of their own

equipment and are advised to have someone on the site overnight where necessary. All damage caused to any part of the site or the park by the organisers or their sub-contractors shall be paid for by the organisers.

A number of events were investigated by the auditor to check that site inspections had been performed both prior to the event and after the event had taken place. Ten of the twenty events sampled had a pre-inspection; only eight had a post-inspection. The BSEM advised that whilst inspections may have taken place, these may not have been formally documented. Six events incurred damage after the event, but only one of these had the costs taken from the event bond.

Advisory – Consideration should be given to ensuring that all events have a pre and post inspection undertaken and appropriately documented. This is an issue that could be rectified if the resources were permitted.

A number of events were also evaluated to check that sufficient notice had been provided by event organisers prior to the event. Where new events are held, notification should be received six months before the event date. This was the case in only two of the six events tested. Where an event is returning, notice should be given five months before the event date. This was the case in seven of the fourteen events tested. First draft event documentation should be received three months before an event. There were just two cases where first drafts had been received within three months. Consultation should occur two to three months before an event. Five of the events that went to the Safety Advisory Group (SAG) had a consultation occur within one month. Final documentation should be received twenty-eight days prior to an event. There were just two events where final documentation was received less than twenty-eight days before the event occurred.

Advisory – Consideration should be given to enforcing the timelines laid out in the event manual to ensure thorough checks can be completed on event documentation.

4.4.5 **Potential Risk: Ineffective working with town centre partnerships and other organisations.**

The BMPED advised that since the completion of the last audit, an Events Manual has been compiled; this is available on the Council's website. This document has helped to provide clarity on how events are organised and includes event application timelines and overall guidance for event organisers. Organisers are advised to produce an event management plan and WDC have provided a template for this, highlighting areas for completion such as event activities and timescales, traffic management, event cancellation and event site evacuation. Event plan guidance has also been collated by the Events team to be used in conjunction with the plan template.

All communications with the Council are based on the event management plan. Event organisers are required to submit an event management plan including risk assessments and all supporting documentation directly to their designated Events Officer. The organiser is also expected to provide information about

potential road closures, equipment, live music, first aid and marketing information.

Event organisers are responsible for putting preventative measures in place to eliminate and minimise any foreseeable damage, including wet weather contingencies. The event organiser has to cover the cost of closing any WDC car parks due to the possible need for resident's vehicles to be relocated. Temporary structures, such as stages or gazebos require a risk assessment, insurance, and method statements. This is in accordance with Health and Safety Regulations. In some cases - depending on the size and shape of the structure - an officer from WDC Building Control will visit, to ensure the safe operation of the structure. Event organisers also need to consider the impact on the road network. Qualified traffic management stewards need to be situated on all road closure points, to be a visual aid to both car users and visitors.

The Events Manual contains advice on the difference between security and stewards. Security staff are licensed by the Security Industry Authority (SIA). Stewards, on the other hand, cannot carry out licensable activities, as they are not licensed by the SIA. Event organisers need to define how security staff and stewards will receive a full briefing before the event, to ensure that they are aware of their individual roles and responsibilities. Temporary road closures are advertised to the public to notify them of the intention to temporarily close the streets to vehicular traffic. Town centre action plans are no longer compiled, although debriefs will take place after events have occurred in order to discuss any issues, complaints, and outstanding payments. WDC do not ask local businesses to provide footfall data. Impact on local businesses, therefore, is not currently measured. Information on the Leamington Parade and Royal Priors footfall is recorded; however, this information has not been shared with WDC or BID.

Advisory – Consideration should be given to try and obtain footfall data from the Royal Priors/Leamington town centre.

The last Economic Impact Assessment was carried out just before the pandemic around 2018/19. The Events team are looking to carry out another assessment focused on the markets.

The BSEM advised that they work in tandem with several other Council departments including the Sports & Leisure team and Green Spaces; these groups are included in the event consultation process. Although teams try to accommodate each other where possible, event requirements cannot always be met, such as grass cutting or refuse collection, as these services are run on their own contracts. During the consultation process, the Green Spaces team will provide guidance to event organisers on protecting species and nesting birds.

4.4.6 Potential Risk: Failure to manage or appropriately support events within the district.

Local businesses are not consulted during the planning phase and no financial investment is sought from them. The Climate Change team does, however, contribute up to £7000 for EcoFest. The Events team also apply to Warwick Town Council for a grant to hold the Victorian Evening each year.

There is a spreadsheet that the team use to monitor the events in place each year. A review of the 2023 and 2024 events lists was completed by the auditor; no clashes between events were found. The only events held on the same day were events which covered multiple towns in the district e.g. Churches Together took place in both Warwick and Leamington.

The Loft Theatre group provides a schedule of their rehearsals, performances, and youth group meetings to help Event Officers avoid clashes. The WDC Market Policy also has carefully planned markets in place to ensure that they do not threaten the viability of the Warwick Charter Market. Any person or organisation intending to establish a permanent market in Warwick district must first satisfy WDC, that the market will not threaten the viability or success of the already-established markets. The auditor found just once instance where a potential stallholder submitted a complaint regarding their stall proposals being rejected. This was, however, an issue that was dealt with by CJs Events as the event organiser.

4.5 **Fraud Risks**

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

Barriers have to be checked by the Events Management team. Event Support Team Ltd also provide night shift security and Heras fencing panels during the National Bowls as well as pedestrian barriers. A number of event documents were investigated by the auditor to check that site security had been included in event plans. Site security measures had been included in twelve of the twenty cases sampled, although not all events require security measures.

The CCTV control room are included on all consultation groups. Regular event organisers are also given a radio linked to the control room. A number of events were checked by the auditor to ensure that the CCTV team had been notified of the upcoming event as part of the consultation process. It was only clear in three cases that the consultation had included the CCTV control room.

Recommendation – Events Officers should be reminded that the CCTV team need to be made aware of all events in advance.

Council staff do not have to be present during events, although some officers are 'on call' for the larger events.

4.5.2 **Potential Risk: Potential of funding or bribery for special treatment.**

The BMPED approves payments made by the BSEM and payments made by Event Officers are approved by the BSEM.

Event plans were checked by the auditor to ensure that agreements between the Council and event organisers had been fully signed and documented. Conditions were laid out in eighteen of the event agreements.

A number of events were evaluated to check that sufficiently detailed documents had been provided as part of the event planning process. One case did not have a site map on file. Seventeen cases had a medical plan and eighteen had a lost

and found child/vulnerable adult procedure as part of the event plan, although some of the events did not require these. All cases had a waste management plan in place and where relevant, a traffic management plan. In one case, the auditor could not locate an event management plan.

Advisory - Consideration should be given to reminding event organisers to produce medical plans, lost, and found procedures and waste management plans where relevant. All event management plans should be saved to the network files.

4.6 Health and Safety Risks

4.6.1 Potential Risk: Risk of a major incident not responded to effectively.

Events staff do not use sign-in sheets when working an event, although CJs Events sign traders in on arrival and direct them to their pitches; organisers are not required to inform WDC of their arrival on site. Once the keys are handed over and a site visit has been complete, the event organisers become responsible for the site. There is a missing person information form included in the event organisers pack. A list of what to include in the missing person description is in the WDC lost/found children and vulnerable adults' procedure.

Advisory – Consideration should be given to making every event organiser complete a lost child/vulnerable adult procedure as a point of best practice.

Where an event organiser has a lost/found child and vulnerable adult procedure in place, they are required to provide DBS checks; however, WDC do not verify these and presume that the event organiser has appropriately completed the DBS check.

Recommendation – Where relevant, Event Officers should liaise with those with the appropriate expertise in the Licensing team to ascertain that event organisers have up-to-date DBS checks in place.

4.6.2 Potential Risk: Acts of terrorism/violence/threats against staff/general public.

Members of the emergency services are included in the consultation process, but they are not expected to attend the event itself. For large, commercial events only, SAG site visits take place before or during an event. As part of upcoming events, CJs Events also compile Traffic Management Plans. All necessary signs and traffic control devices are installed at the event site to direct and regulate traffic movements and ensure that adverse impacts associated with the event are kept to a minimum. Traffic Management Plans also list which members of the public will be affected.

Organisers should have adequate numbers of properly trained stewards capable of raising the alarm, assisting with persons making their escape and calling the Fire Service to all fires, no matter how small. Organisers are advised to provide facilities for administering first aid and must comply with the Health and Safety at Work Act 1974.

The Events team will meet the organiser on site and give them a tour of the area including the location of power and water supplies if required. After this, the organiser is responsible for the security of the area. WDC provide organisers with a Town Centre Evacuation plan if the event is taking place within a Town Centre.

CJs Events staff working on site are required to clock in and out with a GPS location feature. Any staff deployed at the event are provided with a two-way radio; all radios have a panic button that when pressed alerts all radio users. CJs Events are also part of the Warwickshire Retail Crime Initiative and can radio directly to the WDC CCTV control room.

WDC events staff have been issued with Solo Protect devices and can use radios and earpieces to communicate on site. Depending on the size of the event, mobile phones can be used in lieu of radios. Spare radios are kept fully charged and event organisers are provided with staff contact details.

Advisory – Consideration should be given to offering Events Officers conflict management training.

Members of the team have received mandatory corporate training on Martyn's Law, a proposed piece of UK legislation that will require venues and local authorities to have preventative action plans in place against terrorist attacks.

Advisory – Consideration should be given to ensuring that staff keep abreast of any changes to Martyn's Law and consider the effect that this will have on Council events.

4.6.3 Potential Risk: Accidents causing death or injury.

There has been just one incident during the Victorian Evening where damage has been caused. There was, however, no injuries sustained, and no insurance claims made, although this was immediately reported to both the Insurance and Risk Officer and the Health & Safety Premises Manager. There is an Accident & Incident Reporting Diary in place for such eventualities.

4.6.4 Potential Risk: HSE/Safety Advisory Group intervention.

The WDC Safety Advisory Group (SAG) advises on safety aspects for public events in the Warwick district. The SAG offers an independent quality assurance process for event proposals, through consultation and engagement with public safety organisations. The SAG does not have legal responsibility and they are not empowered to approve or prohibit events from taking place. The decisions of the SAG are non-binding and non-enforceable. The SAG provides independent advice to event organisers, who retain the legal responsibility for ensuring an event is safe. The SAG is not involved in the operational management of any event. It is the event organiser that is ultimately responsible for health and safety planning.

Core membership of the WDC SAG comprises senior officers from various public safety organisations, including:

- Emergency Services
- WCC Emergency Planning, Highways, & Traffic Enforcement
- WDC Events, Building Control, Environmental Health, Health & Safety, Licensing and Emergency Planning
- Health Agencies.

Where appropriate, the SAG will request a meeting with an event organiser to discuss their event with these public safety organisations. Alternatively, an event organiser can request a meeting with the SAG. The group is chaired by the BSEM. In general, a 'large scale public event' will be treated as an event where more than 1,000 people are expected to attend, although smaller events may require the involvement of the SAG, depending on the event and areas of significant risk.

In all cases, the responsibility to comply with the Health and Safety at Work Act 1974 and relevant statutory provisions, rests with the event organisers. Event organisers are encouraged to seek their own legal advice on all matters relating to health and safety. If documents from the event organiser are not received two-three months prior to the event date, the SAG can defer the meeting until these are provided.

Details of the SAG meeting dates and times are included in the events monitoring spreadsheet. Minutes are shared with the event organisers who attend the SAG meeting for the purpose of providing advice regarding the event that they are organising. SAG meetings are video recorded for the verification of the accuracy of the minutes of the meeting. Video recordings are retained securely and only accessible to the SAG Chair and SAG admin who uses them to compile the minutes. The retention period for these recordings is seven years after which they are deleted.

Safety checks regarding discussions held at SAG are conducted during a pre-event visit with members of SAG, a site manager, security officer or event organiser. These visits also allow the WDC Food Safety team to check equipment and hygiene.

Advisory – Consideration should be given to compiling a checklist by which events can be assessed prior to the event taking place.

A number of events were evaluated by the auditor to check that they had been discussed at the SAG. Eight of the twenty cases sampled had a SAG meeting. The remaining cases were small events where the criteria did not necessitate a SAG meeting. In three cases, the event was a regular event and therefore negated the need for SAG. In two cases, documentation was sent out via email consultation as opposed to during a formalised SAG meeting. In seven of the eight relevant cases, safety checks formed part of the event consultation. None of the meetings sampled had a representative from any of the three emergency services present.

4.7 Other Risks

4.7.1 Potential Risk: Unavailability of staff/lack of staff resources to meet event demands.

Time-keeping records of hours worked at events are maintained by Events Officers. Event rotas are kept for larger events to ensure that these are sufficiently manned; however, for the majority of events these are not needed.

The BMPED advised that there has been a significant increase in the number of events held and requested, but resources have remained the same. Consequently, the team are now at a point where they either need to bring in more staff to manage the events or start limiting the events held. The BMPED has submitted a growth request for another officer; however, this has been rejected. An Events Review is now taking place with the assistance of the Programme Director for Climate change to decide a way forward. In the absence of a positive outcome from the Events Review, there is a likelihood that officers will have to start limiting the amount of support that they give to each event or the number of events that the Council supports will be reduced, posing a reputational risk to WDC.

Advisory – If the Council have to start limiting the number of events held, consideration should be given to compiling event criteria by which events can take place i.e., in order for an event to run, it has to benefit the community.

Advisory - Consideration should be given to appointing another Events Officer based on any extra income accumulated.

Staff at events do not get paid overtime, but instead receive time off in lieu. Team members are only on call when needed although CJs Events have staff within the Warwick district who can provide cover at short notice should a steward fall ill.

5 **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 1 – Market invoices may not be accurately calculated.
- Risk 2 – Cash handling procedures may not be robust.
- Risk 3 – Charges demanded may not reflect Council fees; financial bonds are not recovered.
- Risk 4 – Contract KPIs ineffectively monitored; no contractor BCP's in place.
- Risk 5 – Lack of clarity between WDC/WCC filming permissions.
- Risk 6 – Insurance may be out of date.
- Risk 7 – No risk assessments provided by funfair organisers.
- Risk 10 – No formal Events Strategy in place.
- Risk 14 – CCTV control room may not be made aware of an event.
- Risk 16 – Possible lack of DBS checks from event organisers.

5.2 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.

5.3 As the review highlighted a relatively high number of weaknesses, several of which are deemed to be medium risk, in overall terms we are required to give a MODERATE degree of assurance that the systems and controls in place in respect of Events Management 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 Events Management – April 2024

Report Ref.	Risk Area	Recommendation	Rating*	Responsible Officer(s)	Management Response	Target Date
4.2.1	Financial Risk: Insufficient budget/excessive event costs.	Staff should be reminded to check market calculations for accuracy before raising invoices.	Low	Business Support & Events Manager	Agreed.	April 2024
4.2.2	Financial Risk: Potential for financial loss through cash handling procedures.	Any cash to be sent to charity should be signed by both the collecting officer and the authorising officer.	Low	Events Officers; Business Support & Events Manager	Cash handling only occurs at the Christmas light switch on events, this will be implemented then.	November 2024
4.2.3	Financial Risk: Failure to maximise potential income from events.	Staff should be checking their events monitoring spreadsheet to ensure that charges are reflective of the fees and charges set.	Medium	Events Officers; Business Support & Events Manager	Agreed.	April 2024

Report Ref.	Risk Area	Recommendation	Rating*	Responsible Officer(s)	Management Response	Target Date
4.2.3	Financial Risk: Failure to maximise potential income from events.	Bonds should be taken up front as part of every event and only refunded where no damage has occurred.	Medium	Events Officers; Business Support & Events Manager	There are some issues with event bonds that require some more work to resolve. The team is concerned that the high bond charges may cause some events to cancel, as the organisers do not have the funds to cover the bond. It is also late in the planning stage for many events this Spring/Summer to be charged extra. Looking to implement this in Autumn 2024 to give a reasonable amount of warning to event's organisers.	October 2024
4.3.1	Legal & Regulatory Risk: Risk of contractor going into administration or deciding to withdraw from the contract.	Contract KPIs should be formally monitored.	Medium	Business Support & Events Manager	Agreed.	September 2024
		BCP's from contractors should be provided on a yearly basis.	Low	Business Support & Events Manager	Agreed.	September 2024
4.3.2	Legal & Regulatory Risk: Legislative requirements not complied with/contracts not complied with.	A list should be compiled of areas in which WDC can give permission to film and those areas which require permission from WCC.	Low	Events Officers; Business Support & Events Manager	Agreed to implement.	October 2024.

Report Ref.	Risk Area	Recommendation	Rating*	Responsible Officer(s)	Management Response	Target Date
4.3.3	Legal & Regulatory Risk: Inappropriate insurance cover in place.	Insurance should be thoroughly checked to ensure that the date is valid to cover the event. In cases where it is out of date, an updated insurance certificate should be requested.	Medium	Events Officers	Agreed.	May 2024
4.3.4	Legal & Regulatory Risk: Ineffective risk assessment planning.	All funfair organisers should provide either method statements or ride risk assessments in advance of events.	Medium	Events Officers	Agreed.	October 2024
4.4.3	Reputational Risk: Events not advertised or advertised incorrectly resulting in low turnout.	A formal events strategy should be documented which includes a policy on the types of promotional/marketing stands permitted.	Low	Business Support & Events Manager	Agree that this is a good idea.	March 2025
4.5.1	Fraud Risk: Unauthorised access to buildings/parks.	Events Officers should be reminded that the CCTV team need to be made aware of all events in advance.	Low	Business Support & Events Manager	Agreed.	May 2024.
4.6.1	Health & Safety Risk: Risk of a major incident not responded to effectively.	Where relevant, Event Officers should liaise with those with the appropriate expertise in the Licensing team to ascertain that event organisers have up-to-date DBS checks in place.	Low	Events Officers	Agreed.	May 2024.

* The ratings refer 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.