# Merton Council Sustainable Communities Overview and Scrutiny Panel

19 January 2023 Supplementary agenda

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# Agenda Item 4

### **Sustainable Communities Overview & Scrutiny Panel – Action Log 2022**

Area	Recommendation	Status	Officer notes	Cabinet date
Tree Strategy	The Panel recommended that the Council's Tree Strategy is reviewed and updated to include how new trees are established and how all trees are maintained		The tree strategy is currently being undertaken. The strategy will be delivered in two parts The first phase concentrating on Councilowned assets, maintenance regimes and risk management. The second phase will take into context private tree assets, planning considerations and the wider urban forest. Report going to SCOSP for 19/01/23 with update. Adoption of Tree Strategy Phase 1 scheduled for March 2023 Cabinet.	<mark>20/03/2023</mark> March Cabinet?
Green Spaces	The Panel recommends that the Council create an overarching Green Spaces strategy in line with the Council's climate commitment and with a focus on community wellbeing	Amber	This is under consideration. There are several Council strategies that touch upon parks and open spaces particularly Local Development Framework documents.  Negotiations with Parks for London and the London Parks Benchmarking Forum indicate that results from the 25 year Environment Plan and current good practice for developing green infrastructure strategies needs updating and the need for a wider Nature Recovery Plan which London Authorities are waiting for the GLA to produce the Nature Recovery Strategy for London so guidance will change with updates expected in April 2023 so it is recommended that boroughs should not waste resources developing open spaces strategies that will be out of date the moment they are released.  25 Year Environment Plan - GOV.UK (www.gov.uk)	09/11/2021

Area	Recommendation	Status	Officer notes	Cabinet date
			The LBM Greenspace Team are using this time to develop a scoping document which will work with other council departments and FoP groups to develop in Spring 2023 onwards	
Flooding	The Thames Water independent review of the flooding to be shared with the Panel once received.	Green		N/A
Tenants Champion	See reference for full details.	Green	Cabinet response here: <a href="https://democracy.merton.gov.uk/documents/s/48404/Housing%20enforcement%20and%20the%20tenants%20chmapion%20role%20002.pdf">https://democracy.merton.gov.uk/documents/s/48404/Housing%20enforcement%20and%20the%20tenants%20chmapion%20role%20002.pdf</a>	19/09/2022
Fly tipping	Considering lack of access to disposal facilities is a driver, the Panel RESOLVED that "This panel requests Cabinet consider ways of bringing the collection of waste closer to the community	Green	The recommendation made by the Panel was welcomed by Cabinet and contributes to the existing developments being made to the service.	19/09/2022
School Streets	The Council explore the possibility for planters and particular features that make it clear it is a school street.	Pending	Scheduled for Cabinet 16/01/23	
School Streets	Cabinet to review the communication of zones including term times in school streets	Pending	Scheduled for Cabinet 16/01/23	
Active Travel	Cabinet looks at resourcing for and prioritise the walking and cycling master plan.	Pending	Scheduled for Cabinet 16/01/23	
Active Travel	Recommend to Cabinet that they examine any potential quick wins that are already identified and still relevant.	Pending	Scheduled for Cabinet 16/01/23	
Clarion Housing	This Panel recommends that it be a default procedure for all repairs to have before and after pictures.	Pending	Originally scheduled for 16/01/23 Cabinet, now pushed back to 20/02/23	
Clarion Housing	This Panel recommends that Clarion, at least once a quarter, help advertise the Resident Association meetings, including where and when they will be held, and that resident associations are allowed	Pending	Originally scheduled for 16/01/23 Cabinet, now pushed back to 20/02/23	

Area	Recommendation	Status	Officer notes	Cabinet date
	access to the communal boards for them to advertise these meetings.			
Clarion Housing	This panel request that Clarion report back on the improvements it makes to communications around repairs and update the panel at the next session they are due to report at.	Pending	Originally scheduled for 16/01/23 Cabinet, now pushed back to 20/02/23	
Clarion Housing	Clarion commit to review all their Merton properties with regards to retrofitting and improving their energy efficiency.	Pending	Originally scheduled for 16/01/23 Cabinet, now pushed back to 20/02/23	
Clarion Housing	The panel recommends that Clarion undertakes a review of all empty or unused Community spaces so that some, if usable, can be allocated for use by resident associations.	Pending	Originally scheduled for 16/01/23 Cabinet, now pushed back to 20/02/23	
Clarion Housing	Clarion to review its protocols for communicating with freeholders and leaseholders on its properties with regards to complaints and repair response times.	Pending	Originally scheduled for 16/01/23 Cabinet, now pushed back to 20/02/23	
Clarion Housing	Recommend greater transparency published about individual estates data on repairs and the satisfaction rates from residents.	Pending	Originally scheduled for 16/01/23 Cabinet, now pushed back to 20/02/23	

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**Committee: Sustainable Communities Overview and** 

**Scrutiny Committee** 

Date: 19th January 2023

Wards: All Wards

#### Subject:

Lead officer: Adrian Ash, Interim Director of Environment, Civic Pride & Climate

Lead member: Councillor Natasha Irons, Cabinet Member for Local Environment,

Greenspaces and Climate Change.

Contact officer: Andrew Kauffman, Head of Parks Services

#### Recommendations:

**A.** That Members are asked to note the content of the report and provide officers with any comments regarding their experience, or reports they have received relating to Park and Playground Maintenance and Cleansing, Highways Verge Maintenance, Cemeteries Maintenance and Burial Management, Sports and Allotment Bookings,

- **B.** That Members are asked to note the progress made by IdverdeUK in supporting the council with its key strategic agendas and associated targets including Climate Action, Public Health, Civic Pride and Borough of Sport as outlined in the report.
- **D.** That Members note the ongoing work undertaken in partnership with LBM Public spaces Team including (Greenspaces / Waste & Enforcement / Leisure Services) in order to improve the collective service.

#### 1 PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1. The report is intended to provide members with an update on the performance of the core grounds maintenance service as laid out in **Part C** of the Recommendations above, over the last twelve (12) months.
- 1.2. The report also looks to provide members with an update on the progress made by the Council (Greenspaces) and Service provider (IdverdeUK) have made update on recommendations made to Cabinet on the 9<sup>th</sup> November 2020 and set out in paragraphs 2.8 to 2.18 of the Committee Report (**report link below**)

#### Cabinet Recomendations 01.09.20

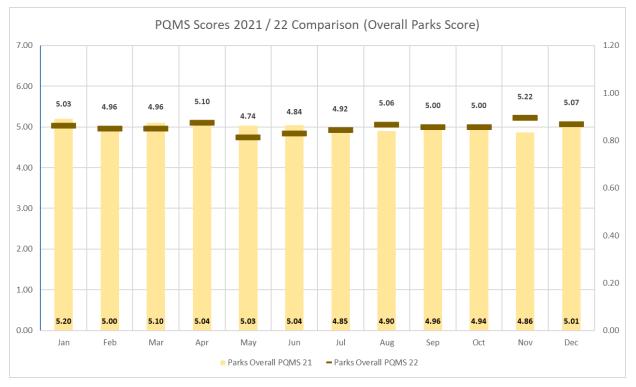
1.3. Finally, the report will summarise additional activity delivered by the service provider (IdverdeUK) working in partnership with Council (Greenspace and other council service teams) on biodiversity, capital works, events, Friends of Parks supported activities as well as other service related activities.

#### 2 DETAILS

2.1. The performance of the ground maintenance and parks contract operated by our service provider IdverdeUK is monitored contractually through the agreed

Performance Quality Management System (PQMS). The below table demonstrates the overall performance of the contract in the last calendar year as compared to 2021, showing that the majority of indicators are close to or exceed contractual requirements and scores for overall parks management operations.

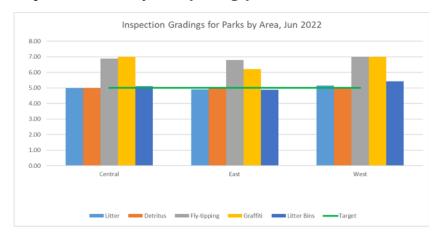
#### **PQMS (OVERALL PARKS SCORE)**



PQMS SCORE (OVERALL PARKS SCORE) 2021-2022 COMPARISON

- 2.2. Since January 2022, the overall parks score on the PQMS (Performance Quality Monitoring Score) graded by LBM Neighbourhood Officers shows a consistent trend of scores around the contractual target of 5 with the overall score being achieved or exceeded during seven of the last twelve months.
- 2.3. In May and June 2022 service providers did experience some staffing issues but with a robust performance plan implemented and and weekly verge cutting reports shared to track progress during this period, improvements were seen in June and July and from that point on corporate target of 5 was achieved and exceeded August 2022 onwards.
- 2.4. As you can see from the extracts from the monthly dashboards for (June 2022) the grass cutting operation adversely affected the overall PQMS, but the rigour of the bi-weekly operational and monthly management meetings picked up these trends early and a detailed service improvement plan was adopted and the necessary improvements made to hit the corporate target in July 2022 and exceed the corporate target for the remains of 2022.
- 2.5. Graphs below show the contract elements that make up the PQMS score for Overall Parks Score; which include Grass, Flower Beds, Hedges, Street Furniture, Playgrounds, Sports, Outdoor Gyms and Buildings

Graph 1: Cleansing / Operation Issues Inspection Grades by Area (Average)



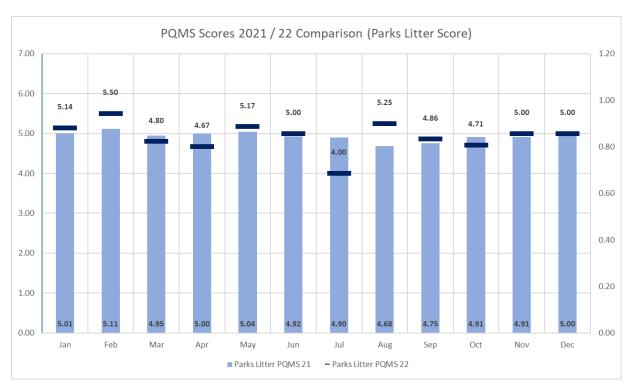
Graph 2: Grounds & Asset Maintenance Issues Inspection Grades by Area (Average)



Inspection Grades by Area June 2022

#### **PQMS (PARKS LITTER)**

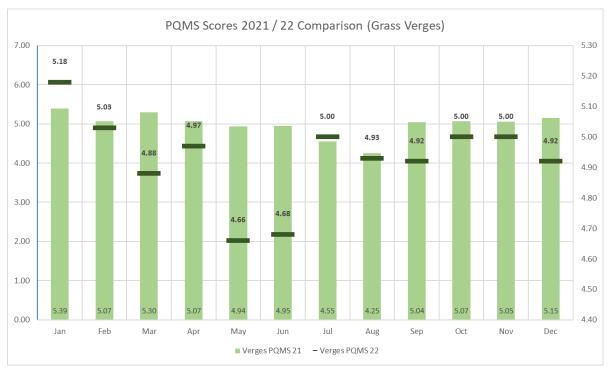
2.6. Since January 2022 parks litter teams have performed well across the year meeting or exceeding the corporate score in 7 out of the 12 months. The poor month in July 2022 can be attributed to staffing issues while teams caught up on grass cutting and back up operations as well as a spike in the cases of fly tipping reports by parks litter bins. These matter were picked up at subsequent bi-weekly operations and monthly management meeting with operations performing strongly for the remainder of the year.



PQMS SCORE (PARKS LITTER SCORE) 2021-2022 COMPARISON

#### **PQMS (VERGE MAINTEANCE)**

2.7. Highways verge maintenance has seen the poorest performance this season only achieving corporate standard in 5 out of the 12 months in 2022.



PQMS SCORE (HIGHWAYS VERGE MAINTENANCE) 2021-2022 COMPARISON

2.8. As per the above graph, it is noted that the Highways verge maintenance operations have seen the greatest change in service with the adoption of the Merton "Wildways" project in April 2022 with a view of improving biodiversity and decreasing the carbon impact of maintenance arrangements.

#### WildWays: boosting biodiversity on grass verges | Merton Council

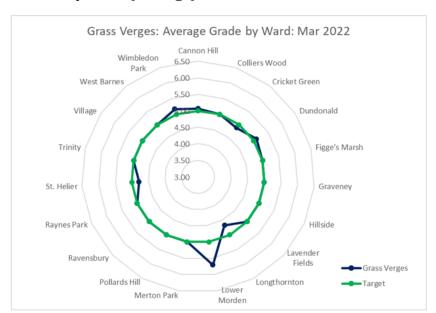
The scheme has seen 11% of Merton's highway verges maintained as Wildways relaxing the current verge maintenance regimes on 14 adopted verges linked to our ambition to use less carbon, become more sustainable and improve local greenspaces and biodiversity.



Highways Verge "Wildways" Initiative and associated verge framing cuts

2.9. The performance in March and April 2022 can be attributed to the education piece for Neighbourhood Officer about the adoption of the Merton Highways "Wildways" Strategy and the performance in June and July 2022 to the loss of East Verge Supervisor, but close monitoring and bi-weekly operational and monthly management meetings ensured that these issues were noted early and necessary improvement plan initiated.

Graph 3: Grass Verge Inspections Grades by Ward (Average)



Grass Verges: Average Grade by Ward: Jun 2022 Cannon Hill Wimbledon 6.50 Town &... 6.00 West Barnes Cricket Green 5.50 Villag Hillside Lavender Fields Grass Verges Ravensbury Longthornton Target Morden

Graph 3: Grass Verge Inspections Grades by Ward (Average)

Radar Chart Showing verge performance May and June 2022

Merton Park

#### **CEMETERIES MANAGEMENT AND MAINETNANCE**

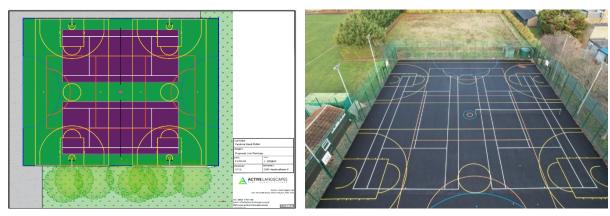
- 2.10. Idverde Cemeteries management and maintenance performance in 2022 across Merton's 4no Cemeteries MSJC, London Road, Gap Road and Church Road Cemetery has shown consistent financial performance being 4.66% ahead of income targets. Which is a positive result considering massive market pressures from the Cremation and Budget Cremation sectors.
  - Priorities for the remains of 2022-23 and beyond will be to increase proactive planned marketing campaign for all borough open cemeteries including the distribution of LBM specific brochure along with increased interface with the Muslim Funeral sector which has seen the largest growth area for the service. As well as continued work on Memorial Safety Testing and Arboriculture Maintenance in line with the new arboriculture contract that commenced with Barkland Tree Specialists in November 2022.
- 2.11. The cemeteries management operation was affected by Highways Staffing issues at Gap Road Cemetery in June 2022, but a robust rectification plan was initiated, and Gap Road Cemetery was bought back into specification by July 2022.
- 2.12. IdverdeUK supported 2022 Armistice and Remembrance Sunday events on 11<sup>th</sup> and 13<sup>th</sup> November 2022 including memorial cleansing, flowers above the enhanced grounds maintenance delivered in 2021
- 2.13. IdverdeUK continued Memorial Safety Testing with LBM Greenspaces Team in Merton Cemeteries and in 2022 working with monumental masons from Peace Memorials completed all the reinstatement of memorial stones on existing landing beams in Section M of the Merton and Sutton Joint Cemetery in 2022.



Lower Green War Memorial Mitcham cleansed ahead of Armistice Day Commemorations

#### SPORTS LEISURE MAINETNANCE, MANAGEMENT AND DEVELOPMENT

- 2.14. Idverde Sport and Leisure performance in 2022 saw positive financial growth between January-December 2022 being 15.10% ahead of budget as of 31/12/2022 which considering weather in Q4 this is very strong.
- 2.15. Idverde are also supporting the council with a number of wider external funding projects working with sports governing bodies including Lawn Tennis Association, Surrey County Cricket Board and Football Foundation with a focus on improving and maintaining existing court infrastructure.
- 2.16. During last year (Jan-Dec 2022), the Greenspaces team prioritised work within our sport and leisure offer to expand into Capital Works with support provided by Idverde on a range of Strategic and Neighbourhood CIL projects including Multi Use Sports Areas (MUSA) at Haydons Road Recreation Ground, Colliers Wood Recreation Ground and Morden Recreation Ground



Haydons Road Recreation Ground MUSA prior to colour coating and line marking

- 2022 saw expanded Event Management from Idverde UK including
- Wimbledon Tennis Queue, Camping and Park and Ride event management
- Wimbledon Tennis Big Screen and Women's European Football Championships Big Screens at Canons House and Grounds event management

Wimbledon and Morden Park Fireworks event support





Wimbledon Tennis Big Screen at Canons House and Grounds





Women's European Championship Big Screen at Canons House and Grounds

#### ALLOTMENT MAINTENANCE AND MANAGEMENT

- 2.17. The Allotment performance in 2022 continued to see the positive impact of the dedicated allotment officer resource and adoption of the NEW Colony allotment management software. Including positive financial performance on Allotment annual invoicing as well as service satisfaction noted by a reduction of member enquiries and Stage 1 complaints regarding the service.
- 2.18. Working in partnership during 2022 season the council and Idverde have proactively supported the reduction of the allotment waiting list by tackling the overgrown/unlettable plots working with Idverde staff during winter works program to bring 59 once un-lettable plots back into cultivation, all plots have now been let to tenants on the waiting list

	Total Plots	Let Plots	Unlettable Plots	Vacant Plots	Decommissioned Plots	Total Tenants	No. of paid invoices	
LBS	2566	2300	18	151	91	1499	2404	

Total Plots avaliable in Merton verses unlettable plots 2021

Sites	Overgrown plots	Clearance completed
Brooklands Avenue	0	N/A
Cannizaro Park	0	N/A
Cottenham Park	20	Nov-22
Durnsford Road	11	Jan-22
Eastfields Road	4	Jan-22
Effra Road	0	N/A
Eveline Road	4	Nov-22
Haslemere Avenue	0	N/A
Havelock Road	1	Nov-22
Phipps Bridge Road	8	Jan-22
Thurleston Avenue	11	Oct-22

Table showing unlettable plots processed in 2022

2.19. In light of rising service and utility charges in September 2022 the council in partnership with service providers at Idverde and LBM Facilities Management have established an allotment working group in an attempt to reduce the water bills on allotment sites by tackling water leaks and un-authorised water use on allotments.

#### **IDVERDE GREENSPACE DEVELOPMENT TEAM**

- 2.20. During 2022 the council Greenspaces team have worked hard to maximise the two free days per month of Idverde Greenspace Development Team resource provided by Idverde UK under the terms of the SLWP Phase C Lot 2 Ground Maintenance contract and the benefits seen in 2022 include:
  - 6000 hours of Ministry of Justice Community Payback hours who support 4no projects per week in Merton.

Site	Day	Supported Group	Supported Activities 2022
Abbey Rec	Monday	WERA_Merton	Hedge Planting
			Pond Creation
			Planting Projects
Nelson Gardens	Tuesday	Friends of Nelson Gardens	Paint perimeter railings
			Wildflower Meadow Creation
			Improve sight lines
Wimbledon Park	Wednesday	Friends of Wimbledon Park	Watering new trees and hedges
			Hedge planting

			Rubbing down and staining benches
Kendor Gardens	Thursday	Friends of	Wildflower Meadow
		Kendor Gardens	Creation
			Bulb Planting
			Creating feature planting beds

Table outlining Idverde UK / Community Payback activity IN Merton Parks 2022



Twitter Feed from Friends of Paks Groups about Community Payback Partnership

 Worked with LBM Greenspaces Team and Environmental Charity Groundwork London to establish Corporate Volunteering Park Pilot in Merton delivering three paid corporate volunteer days in Merton Parks this year

Park	Date	Supported Group	Corporate Volunteer	Task
Wimbledon Park	08/08/22	Friends of Wimbledon Park	Lacoste	Wimbledon Tennis Plant Re- use Scheme
Cannizaro Park	08/08/22	Friends of Cannizaro Park	Lacoste	Wimbledon Tennis Plant Re- use Scheme
Canons House and Grounds 08/11/22		Friends of Canons House and Grounds	PWC Price Waterhouse Cooper	Biodiversity forest school area at Canon



Twitter communications about Idverde supported Corporate and School Events

# 2.21. During 2022 Idverde UK continued to support our Friends of Parks groups with funding support including

Site	Group	Funder	Support provided			
Nelson Gardens	Friends of Nelson	Idverde Community	Idverde Funding Pot			
	Gardens	Investment Fund	£1000.00 SECURED			
Mostyn Gardens	Friends of Mostyn	Groundwork Trust	Supported LBM			
	Gardens	Grow Back Greener	Parks Development Team with Application £35,000.00 secured			
Garefield Park	Garefield Park Friends of Garefield Park		Idverde Playforce Design and cost estimate			
			£65,000.00 BID			
Morden Park	Friends of Morden Park	LBM Civic Pride Bid	Idverde Playforce Design and cost estimate			
			£75,000.00 BID			

- 2.22. The council along with service providers at Idverde UK Operations and Development Team have attended all recent Independent Merton Greenspaces Forum Meetings both online and I person to discuss council and contract progress and answer any questions from the Friends groups in attendance.
- 2.23. Update against recommendations agreed by cabinet at the last Sustainable Overview and Scrutiny Panel on 9<sup>th</sup> November 2020 (link below)

Cabinet Idverde Recs 01.09.20 002.pdf (merton.gov.uk)

2.8 The Sustainable Communities Overview and Scrutiny Panel welcomes this opportunity to comment on the Idverde Grounds Maintenance service and to raise issues for consideration by Cabinet.

Items are reviewed at monthly operational and management review meetings with idevrdeuk.

- **2.9** Panel would welcome the opportunity to undertake further process mapping work on the inspection and reporting methodology within the contract. In order to fully understand how the performance data is created and reported, the Panel requests further information, including but not limited to;
- a) Contract specifications / classification for different types of greens spaces.
- **b)** Directory of standards/management plans for different classifications of green spaces
- c) Findings represented by type
- **d)** Types inspected in direct proportion to square meterage of that type within the borough.
- e) Details on how the average is created
- **f)** Ratio of inspections for those 'below standard' to how many are 'random'. Ideally there needs to be a 'random' to 're-inspection' ratio that forces those areas that have 'failed' to be re-inspected within a shorter amount of time.

## PRESENTATION WAS GIVEN TO OVERVIEW AND SCRUTINY PANEL THAT ATTENDED SITE MEETING ON 17<sup>TH</sup> FEBRUARY 2022 AS OUTLINED BELOW.

**2.10.** Additionally, alongside this information, the Panel would like to undertake site visits to a sample of green spaces in Merton, with details of the reporting pro forma used by Client Officers when inspecting.

Site visit was conducted by Andrew Kauffman and Claire Secord on **17 February 2022** with Cllr Mundy / Holden and Fairclough to Colliers Wood Rec / Wimbledon Park and Morden Park

2.11. The Panel recommended that the Council's Tree Strategy is reviewed and updated to include how new trees are established and how all trees are maintained.

The LBM Tree Strategy time-line see SCOSP Tree Strategy Report going for adoption in March 2023 see timeline below

Task	Oct	Nov	Dec	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	March	April
Tusk	2022	2021	2021	2022	2022	2022	2022	2022	2022	2022	2022	2022	2022	2022	2022	2023	2023	2023	2023
Procure Tree																			
Strategy Arb																			
Contractor																			
Stakeholder																			
Consultation																			
Part 1																			
Prepare 1st																			
Draft for LBM																			
review																			
Stakeholder																			
Consultation																			
Part 2																			
Extended																			
Prepare 2 <sup>nd</sup>																			
Draft for LBM																			
review																			
LBM Tree																			
Contract																			
commenced																			
LBM																			
Greenspace																			
Review																			
Tree Strategy																			
Formatting																			
Digital and Paper V																			
Formal Tree																			
Strategy																			
Adoption			l	l	l		l	l	l	l		l			l	l	l		

2.12. The Panel recommends that the Council create an overarching Green Spaces strategy in line with the Council's climate commitment and with a focus on community wellbeing.

The council has commenced a scoping exercise on the corporate Parks and Open Spaces Strategy, but have been recommended by Parks for London that due to slow progress on the Nature Recovery Plan by the GLA on the back of the 25 year Environment Plan the current good practice for developing green infrastructure strategies and Nature Recovery Plans are with the GLA and boroughs should not waste resources on strategies that will be out of date the time they are released and advised to wait for the Nature Recovery Plan which is not expected until April 2023 at the earliest.

2.13. The Panel recommends to Cabinet that the Council should consider developing a 'One Stop Shop' web based reporting system to make it easier for our residents to report any issues relating to parks, waste and public spaces in one place and bring an update on this to the Sustainable Communities Panel.

#### **FIX MY STREET (FMS)**

REPORT IT LINK

Has been updated by corporate services for Highways Grass and Highways Trees (Sptember 2022) and Parks and Open Spaces will be next for consideration. Councils greenspaces team are working with service providers at Idverde to discuss full integration with FMS

2.14. Further to this, a recommendation to display signage in parks informing residents on how to report issues and express their views would enable the Council to be fully aware of the resident experience of our green spaces.

With recent **Cleaner Greener Funding** Council Greenspaces team have recently been conducting a strategic signage up-grade across parks upgrading old signs and notice boards to a new agreed Parks Sign and Noticeboard. Current reporting procedures will be provide in the signs across parks in line with LBM Website

Litter, fly-tipping and weeds on streets: Report it | Merton Council

**ANNUAL PARKS SURVEY** (User satisfaction survey) To be conducted Summer 2023 by idverdeUK which is part of the Greenspace Development offer from IdverdeUK. To allow the general public to express their view on their LBM Park experience.

2.15. The Panel recommended that a quarterly stakeholder meeting be held, made up of groups included within the independent greenspaces forum and other like-minded organisations.

The Council Greenspaces Team and Service providers from IdverdeUK operational and development colleagues are meeting with the IMGSF on a Quarterly Basis currently with Friends of Parks Groups, Merton Societies.

2.16. For both Idverde's Annual Report and the Independent Green Spaces Forum annual report to come to the Sustainable Communities Panel.

#### **Idverde Annual Report**

Reviewing ways that the Idverde Annual or Monthly operational performance reports can be shared on line

#### **IMGSF Annual Report**

Already shared with the committee

2.17. The Panel requested quarterly written updates from Officers providing information and feedback on how the recommendations are being met and evidence that the service is improving. This work should also be underpinned by amending the data included within the performance monitoring framework to include both a monthly and quarterly measure

Council greenspaces team working with corporate services to agree the best way to share this information

2.18 Additionally the Panel requested that Idverde return to the Sustainable Communities Panel in one year in order to carry out a review of the progress achieved.

COVID 19 precluded previous attendance but Service providers from IdverdeUK are happy to attend future SOSC meetings

#### 3 ALTERNATIVE OPTIONS

3.1. As this is a performance review of the current service provider arrangements, alternative options have not been considered.

#### 4 CONSULTATION UNDERTAKEN OR PROPOSED

- 4.1. None for the purposes of this report.
- 5 TIMETABLE
- 5.1. None for the purposes of this report.
- 6 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS
- 6.1. None for the purposes of this report.
- 7 LEGAL AND STATUTORY IMPLICATIONS
- 7.1. None for the purposes of this report.
- 8 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS
- 8.1. None for the purposes of this report.
- 9 CRIME AND DISORDER IMPLICATIONS

- 9.1. None for the purposes of this report.
- 10 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS
- 10.1. None for the purposes of this report.
- 11 APPENDICES THE FOLLOWING DOCUMENTS ARE TO BE PUBLISHED WITH THIS REPORT AND FORM PART OF THE REPORT
  - None for this report
- 12 BACKGROUND PAPERS
- 12.1. None for the purposes of this report, applicable links are within the body of the report.

