

### COMMITTEES

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### 3 October 2020

# SUMMARY AND ANALYSIS: CASTLE CONTROL BOARD DRAFT ANNUAL REPORT 2019/20

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The mandate of the Castle Control Board (CCB) is derived from the Castle Management Act, 1993 (No. 207 of 1993) which requires it to preserve and protect the military and cultural heritage of the Castle of Good Hope (CGH)<sup>1</sup>, South Africa's oldest architectural structure<sup>2</sup> - on behalf of the Minister of Defence and Military Veterans. Both the National Heritage Resources Act (No. 25 of 1999) and the Defence Endowment Property and Account Act (No. 33 of 19922) also cover certain aspects of the mandate.<sup>3</sup> The aim of this brief is to provide a summary and analysis of the *Draft* CCB's 2019/20 Annual Report submitted on 1 October 2020 to the Portfolio Committee on Defence and Military Veterans (PCODMV). It focuses on the:

- Strategic Overview for the 2019/20 Financial Year with specific reference to Strategic Priorities of Government and Strategic Priorities of the CCB.
- Overview and Assessment of Financial Performance with specific reference to the Appropriation statement for the 2019/20 financial year; Financial statements.
- Overview and Assessment of Programme Performance focusing on the four Programmes.
- Governance and Human Resources.

# **1.1** Budgetary Review and Recommendations Report (BRRR)

The scrutiny of the annual reports of departments and entities has as one of its aims, the facilitation of the drafting of the annual Budgetary Review and Recommendations Report (BRRR) of parliamentary committees. Therefore, a second aim of this analysis is to assist the Committee to draft a preliminary BRRR prior to considering the submission of the finalised and audited 2019/20 annual Report.

# 2. STRATEGIC OVERVIEW

# 2.1 Strategic Outcome oriented goals

The 2019/20 Annual Performance Plan (APP) of the CCB referred to its Strategic Outcome oriented goals as:

- To ensure effective administrative management in terms of corporate governance and professional competent corporate image.
- To develop the museum and interpretative components of the Castle and its related themes through continuous research and development.
- To ensure promotion of the Castle as a must-see and vibrant tourist destination accessible to all the citizens of South Africa and the world.
- To ensure the accessibility of the Castle as an attractive and user-friendly centre of cultural significance by all sectors of the community.<sup>4</sup>

# 2.2 Highlights

The Chairperson and Chief Executive Officer of the CCB highlighted the following:

- An unqualified audit opinion from the AGSA.<sup>5</sup> (The A-G has not yet published it finalised findings)
- Completion of the Castle's first-ever DOD-funded Integrated Conservation Management Plan (ICMP).
- R3 million relief support to the CCB during the COVID-19 crisis.<sup>6</sup>
- Building long-term, working heritage partnerships
- The appointment of the gardening and maintenance service provider.



- Managing to open the doors of the Castle of Good Hope to an inclusive, multi-cultural and diverse visitor audience.
- Visitor numbers stood at 195 054, slightly below the record 2018/19 figure of 201 756, but above the APP target of 170 000.
- Despite the struggling Western Cape tourism economy, managed to self-generate R5 516 780.<sup>7</sup>

# **Potential BRRR Questions:**

- Although the CCB as received an unqualified audit outcome for the last two financial years, this is a regression from two consecutive clean audits. What has subsequently been done to address the root causes of the unqualified audit opinion? (The AG still has to publish its finalised report)
- The CCB should be requested to update the Committee on a regular basis on the implementation of the completed Integrated Conservation Management Plan.
- The R3 million relief support to the CCB was envisaged to assist the entity till December 2020. Has the relief been sufficient and can a breakdown be provided how the support was utilised?

# 2.3 Challenges

These include the following:

- Regressing to two subsequent unqualified audit opinion<sup>8</sup> from two consecutive clean audit opinions.
- Going concern status.<sup>9</sup> Freezing of vacant positions in the interim to secure its going concern status.<sup>10</sup>
- The urgent need for a nominal operational subsidy for the organisation.<sup>11</sup> between R850k and R1.2m per annum from the DOD, in addition to the annual R4.5 million maintenance and repairs support from the DOD.<sup>12</sup>
- The departure of three managers and two other staff members.<sup>13</sup>
- Little progress to review the Castle Management Act (No. 207 of 1993),<sup>14</sup> which started in July 2013.<sup>15</sup>
- Tackling the safety and security risks at the entrance and around the Castle.<sup>16</sup>

#### Focus during the new Financial Year: Challenges and Opportunities<sup>17</sup>

- Dealing with the challenges and opportunities a post-COVID-19 world;
- Formalising the legal agreement between the Executive Authority and the Board;
- Seriously addressing the going concern and sustainability challenges once and for all;
- Pursuing the review of and possible amendments to the Castle Management Act;
- Tackling the safety and security risks at the main entrance and around the Castle;
- Pursuing the Castle's UNESCO World Heritage Site listing;
- Roll-out of the CCB's Responsible Commercialisation strategy to drive sustainability; and
- Maintain and strengthening institutional, corporate, and administrative management processes at the CCB.

- The Committee will closely monitor the developments around the attempts to "seriously address the going concern and sustainability challenges once and for all," given that concerns remain.
- What progress has been made in "dealing with the challenges and opportunities of a post-COVID-19 world"?
- It is concerning that, for the umpteenth time, the CCB reports no progress regarding attempts to amend the Castle Management Act. The Committee may want to enquire around the reasons for this and the planning going forward.



- What progress has been made to ensure the safety and security concerns of staff and visitors at the entrance and around the Castle?
- Has any progress been made with finalising the space-allocation and utilisation of the Castle Control Board?
- What are the next steps to facilitate the UNESCO World Heritage Site listing and can the CCB adhere to the stipulated requirements and by when does it foresee it will be granted this listing?
- What exactly does the Responsible Commercialisation strategy involve given that it is only mentioned once in the draft Annual Report and when will it be presented to the Committee as the CCB's sustainability remains a concern?

# 3. OVERVIEW AND ASSESSMENT OF FINANCIAL PERFORMANCE

# **3.1** Financial Performance for the 2019/20 Financial Year

The under-expenditure for the CCB for the FY2019/20 was R3 111 000 versus the R789 000 for FY 2018/19. This is mainly due to the under-expenditure of R2 732 000 in Administration Programme, R234 000 in the Conservation Programme, R6 000 in the Tourism Promotion Programme, and R141 000 in the Public Access Programme.<sup>18</sup>

Programme	2017/18		2018/19 <sup>19</sup>		2019/20 <sup>20</sup>		
	R'000		R'000		R'000		(Over)/Under
	Budget	Actual	Budget	Actual	Budget	Actual	Expenditure
		Expenditure		Expenditure		Expenditure	
Administration	7 683	7 565	7 061	6534	8 031	5 299	2 732
Conservation	528	570	525	230	662	428	234
Tourism	63	39	60	3	15	9	6
Promotion							
Public Access	264	279	204	294	250	109	141
Total	8 538	8 453	7 850	7 061	8 958	5 845	3 113

#### Table 1: Budget for FY2017/18 to FY2019/20

- In FY 2018/29, Administration expenditure was 92% and this dropped to 66% in FY2019/20. The main reasons for this should be explained.
- The sharp drop in Tourism promotion between FY2018/19 and FY2019/20, from a target R60 000 to R15 000 should be explained.
- It is encouraging that the expenditure on Conservation has increased from 5% the previous year to 60% for the year under review and the CCB should be encouraged to continue on this trend.
- The overall decrease in expenditure from 90% in FY2018/19 to 62% in FY2019/20 largely due to under expenditure in the HR environment and the CCB should indicate how they plan to they will fill those posts again if there is no improvement in revenue generation.



	2017/18		2018/19			2019/20		
Source	Estimate	Amount	Estimate	Amount	(Over)/under	Estimate	Amount	(Over)/under
of		collected		collected	collection		collected	collection
revenue								
Sales	4 500	4 124	5 000	4 383	617	5 870	3 921	1 949
Rental	3 465	1 132	2 220	1 322	898	2 456	1 496	960
income								
Other	324	450	575	3 243	(2 768)	622	394	228
income								
Interest	249	117	55	14	41	10	0	10
income								
TOTAL	8 538	5 823	7 850	9 062	(1 212)	8 958	5 811	3 147

# Table 2: Revenue FY 2017/18 - 2019/20<sup>21</sup>

Similar to the FY2017/18 and FY 2018/19,<sup>22</sup> the CCB states that "Sales income is in line with our estimates for the year. However, the provision made to compensate for the access to our historic surplus funds, skews this estimate thus painting a picture of under-performance."

### **Potential BRRR Questions:**

- As opposed to an over collection of R1 212 000 in the previous year, the CCB had an under collection of R3 147 000 for the year under review and it implies that the CCB only collected 65% of the estimated amount. What are the reasons for the under collection?
- The estimate of R10 000 for Interest income did not yield any income.<sup>23</sup> What are the reasons for this as one would expect its investments to accrue interests? If it has to do with the consolidation of its investments in ABSA at a higher interest rate, when does it foresee it will receive the first interests from this "improved" investment?<sup>24</sup>
- Is part of the dwindling *Interest Income* related to the decreasing amount of the historically accumulated surplus? The huge decrease from R177 000 in FY2017/18 to R14 000 in FY2018/19 and zero in FY 2019/20 should be explained, especially since this is the third year running that there has been an under collection on this item.
- The consistent under collection in *Rental Income* (R960 000), for the third year running is concerning and should be explained, as well as what progress has been made to remedy this situation.
- What exactly is the situation around the Curio shop as its income has dropped from R64 980 in FY2018/19 to R38 024 in FY2019/20?<sup>25</sup>
- How much of the revenue generated can be directly attributed to much vaunted Responsible Revenue Generation Plan?<sup>26</sup>

Similar to the previous two Annual Report (FY2017/18 and FY2018/18) this draft Annual Report states that the CCB plans to address the revenue challenge through, *inter alia*, the roll-out of their Revenue Generation Strategy. They have opened a Gift Shop, started to promote the state-of-art Conference Centre to generate income, recruited a new restauranteur to improve turnover and will focus on high-yield events for the site. In the areas of administration, they will settle their human resource component.<sup>27&28&29</sup>

- The CCB has been publicising their Revenue Generation/Optimisation Strategy for the last three years and yet it reported the under collection of revenue for at least the last three years as indicted above. The Committee should question the viability of this Revenue Strategy which is in Phase 2 and request the CCB to consider alternatives given that this Strategy does not seem to yield the expected results.
- As in the previous Annual Report, it refers to "*settling the human resource component*." Is this only referring to the "unrealistic number of interns of 15 per annum" who will be paid by the Department, or are there other plans to settle the human resources component?<sup>30</sup>



## **3.2** Financial statements

### Irregular expenditure Unauthorised Expenditure and Fruitless and Wasteful Expenditure

No Irregular expenditure has been listed for the FY2019/20<sup>31</sup> similar to FY 2018/19.<sup>32</sup> (The A-G's finalised report is still outstanding)

#### Unauthorised Expenditure and Fruitless and Wasteful Expenditure

For the third year running, no unauthorised expenditure nor Fruitless and Wasteful Expenditure were incurred during the year under review, nor in the previous financial year.<sup>33&34</sup>

#### **Potential BRRR Comment:**

• The CCB should be commended for not incurring any Irregular expenditure, nor Unauthorised Expenditure or Fruitless and Wasteful Expenditure for the FY 2018/19 and FY2019/20.

### 3.3 Findings of the Auditor-General of South Africa

For the FY2019/20, the CCB received an **unqualified audit opinion**<sup>35</sup> from the AGSA versus an **unqualified audit opinion** for FY2018/19 and clean audit opinions for FY2016/17 and for FY2017/18.<sup>36</sup> This audit opinion relates specifically to the financial statements.<sup>37</sup>

#### **Potential BRRR Questions:**

• The Committee should question the CCB regarding the specific reasons for the unqualified audit opinion on the financial statements, and in particular what has been done since the audit opinion to address the situation, as indicated above.

#### 3.3.1 Going Concern

In paragraph 2.3 above, disquiet around the *Going Concern* status of the CCB has been raised. Similar to FY2018/19<sup>38</sup> the A-G notes the "*Material uncertainty relating to going concern*" where it draws attention to the financial statements' Note 25, detailed on page 38, which deals with subsequent events and specifically the possible effects of the future implications of COVID-19 on the entity's future prospects, performance and cash flows.

#### **Potential BRRR Questions:**

• The CCB states that "Although the CCB's going concern status is intact for the present, we have registered our urgent need for a nominal operational subsidy for the organization. The supplementary allocation will allow us to amplify our delivery impact" which seems to indicate that the 'going concern' status will be reliant on this urgent "nominal operational subsidy." Further as one of its focus areas for the new FY, it states it wants to seriously address the going concern and sustainability challenges once and for all."<sup>39</sup>

• The Committee may want to clarify this position as both the concerns of the AG and the request for a "subsidy" indicate that the going concern status remain problematic.

As with the FY2018/19 Annual Report, the current Annual Report states that "*The Board is aware of financial challenges that have a negative impact on the CCB's ability to continue as a going concern.... However, the Board believes that the CCB has access to adequate financial resources, through the intervention of the Ministry of Defence, to continue operations for the foreseeable future and accordingly the annual financial statements have been prepared on a going concern basis.*"<sup>40</sup>



## **Potential BRRR Questions:**

• The repeated acknowledgement that its *Going concern status* will be reliant on the assistance of the DOD, confirms the contention that the CCB has challenges with this issue.

The AG evaluated the usefulness and reliability of the reported performance information in Programme 2: maintenance and conservation at the CGH<sup>41</sup> and concluded that he did not identify any material findings on the usefulness and reliability of the reported performance information for this programme.

# **Potential BRRR Comment:**

• The CCB should be commended for the usefulness and reliability of the reported performance information in Programme 2.

### **3.3.2.** Internal control deficiencies

The AG noted the following in this regard:" Leadership did not excise oversight responsibility regarding financial and performance reporting and compliance as well as related internal controls to ensure that the financial statements and annual performance report are free from material misstatements."<sup>42</sup>

### **Potential BRRR Questions:**

• The Committee may want to question the CCB on this issue, especially whether measures have been put in place to prevent a re-occurrence of this finding.

# 4. OVERVIEW AND ASSESSMENT OF PROGRAMME PERFORMANCE

#### Non-financial performance

The Annual Report 2019/20 indicates that 19 of the 21<sup>43</sup> key performance indicators were achieved vs 15 of the 18 key performance indicators in FY 2018/19.<sup>44</sup> The 90.5% success rate was met with spending of 65.24% of the allocation in FY2019/20, while 15 of the 18 targets was met with spending of 89.9% in the previous financial year.

TARGET	FY2019/20	FY2018/19
Total targets set	21	18
Targets achieved	19	15/18
Targets not achieved	2	3/18
Success rate	90.5%	83.33%
Total Budget Spent (%)	65.24% (R5 845 000/R8 958 00)	89.9% (R7 061 000/R7 850 000)

#### 4.1 Programme 1: Administration and Good Corporate Governance

This programme saw a success rate of 87.5% as only one of the eight targets were not met. This against a spending of 66% of the budget (R5 299 000). This programme deals with areas of administration, corporate governance, financial management, human resource management and stakeholder communication.<sup>45</sup>



	FY2019/20	FY2018/19
Programme 1: Targets	8	4
Targets achieved	7/8	4/4
Targets not achieved	1/8	0/4
Success rate	87.5%%	100%
Programme Budget Spent (%)	66% (R5 299/R8 031)	92.3% (R6 534/R7 061)

#### **Potential BRRR Questions:**

- The CCB should be commended for achieving 87% of its targets in Programme 1, albeit that all four were achieved in the previous financial year.
- The missed target relates to the payment of invoices within 30 days and the CCB indicated that as a mitigating strategy, it will ensure that their Finance Section has all controls in place to pay invoices on time.
- The Committee should impress on the CCB the importance of paying invoices on time, especially those of SMME's given their heavy reliance on on-time payments to ensure the continued existence of their businesses, especially in these times of the Covid-19 pandemic.

# 4.2 Programme 2: Preservation, Interpretation and Showcasing of the History of the Castle

All three targets of Programme 2 have been achieved against a spending of 64.5% of the budget versus the achievement of 3 of the 4 targets in the previous year at a spending-rate of 43.8%.

	FY2019/20	FY2018/19
Programme 2 targets	3	4
Targets achieved	3/3	3/4
Targets not achieved	0/4	1/4
Success rate	100%	75%
Programme Budget Spent (%)	64.5% (R428 000/R662 0000)	43.8% (R230 000/R525 0000

# **Potential BRRR Questions:**

- The CCB should be commended for the performance of this Programme especially as it relates to the preservation and showing of the Castle.
- Why was the number of targets decreased from 4 to 3 between the last two financial years?

• A concern is also that only 64.5% of the budget has been spend to achieve all targets. Does this mean the budget can remain at this level to continue achieving 100% success rate?

# 4.3 Programme 3: Maximising the Tourist Potential

As with the previous financial year, Programme 3 saw a performance where 5 of the six targets were met. The missed target relates to gross revenue generated for the year. However, while only 5% of the budget has been spent in the previous financial year with a success rate of 83.33%, the year under review saw a 60% utilisation of the allocated budget with the same success rate.<sup>46&47</sup>

	FY2019/20	FY2018/19
Programme 3 targets	б	б
Targets achieved	5/6	5/6
Targets not achieved	1/6	1/6
Success rate	83.33%	83.33%

Programme Budget Spent

60% (R9 000/R15 000)

5% (R3 000/R60 000)

#### **Potential BRRR Questions:**

- The fact that this Programme which relate to the Maximizing the tourism potential of the Castlerecorded a success rate of 83.33% for the last two years, but with 5% of its budget in FY2018/19 and 60% in FY2019/20, is striking and the Committee may want to interrogate this further.
- The target of *Gross annual revenue* was missed by R 2 842 220 (R2 167 097 in FY2018/19) which underline the concern around the *Going Concern* status of the CCB.
- Visitor figures to the Castle decreased by 6 702 from the previous year, even though it exceeded the annual target of 170 000. It should be asked how this target was determined given the over achievement in the two previous years.
- The CCB should be complemented for the over-achievement of the Number of commercial events (+4) and film and fashion shoots (+3) at the CGH as these serve as important revenue-generation initiatives.

# **4.4** Programme 4: Increased Public Profile and Positive Perception Across all Sectors of the Community

Similar to the previous financial year, all 4 APP targets were met, resulting in a success rate of 100%, and the CCB should be lauded for this achievement. The *Number of student-learnerships and internships offered per annum* has, however, decreased from 26 in FY2017/18 to 15 in FY 2018/19 and to 12 for FY 2019/20.

	FY2019/20	FY2018/19
Programme 4 targets	4	4
Targets achieved	4/4	4/4
Targets not achieved	0/4	0/4
Success rate	100%	100%
Programme Budget Spent (%)	43.6% (R109 000/R250 000)	144% (R294 000/R204 000)

- This programme performed well in that all four targets have been achieved and this at only 43.6% of the allocated budget. This against the 100% achievement of targets and an overspending of R90 000 in FY2018/19.
- Given the challenges of youth unemployment in the country, the CCB should be encouraged to maximise the learning opportunities for the youth at the CGH through the number of student learnerships offers per annum at the CCB.
- It is especially the target of "number of heritage-educational programmes for women, unemployed youth, disabled and traditional communities", that is welcomed, given that it had a target of 12 and overachieved this with 18 more than required.
- The Committee may want to engage the CCB further on the specifics of these programmes as its Members can make their constituents aware of these programmes as well as possibly assisting to launch such programmes in the various constituencies.



The Annual Report refers to various issues under this section, *inter alia* its engagements with the Portfolio Committee, that it operates as a Schedule 3A Public Entity, and it states that a Risk Register has been developed to determine the effectiveness of its risk management strategy and to identify new and emerging risks.<sup>48</sup>

# 5.1 Risk Management

The draft Annual Report indicates that the CCB has developed a Risk Register, which forms the basis for regular risk assessments to determine the effectiveness of its risk management strategy and to identify new and emerging risks.<sup>49</sup> While the Annual Report for FY2017/18<sup>50</sup> listed the various Strategic Risks, this was not done for the last two years. These risks included the shortcomings in the Castle Control Board's founding Act; the safety and security concerns of staff and visitors to the Castle; and finalising the space-allocation, utilisation and sustainability of the Castle Control Board.<sup>51</sup>

### **Potential BRRR Questions:**

- Similar to the FY2017/18 and FY2018/19,<sup>52</sup> the CCB does not list the actions plans to address the Strategic Risks, as opposed to this being done by the Department of Defence and the Department of the Military Veterans.<sup>53</sup> The Board should be requested to include an Action plan to address these strategic risks.
- In the past the Annual Report listed space allocation as a challenge,<sup>54</sup> and the current Report does not refer to this issue. What is the latest regarding space allocation as it mentioned before that its income generation capacity and drive towards sustainability is more than often undermined by other on-site organisations trading in direct competition.<sup>55</sup>

# 5.2 Fraud and corruption

The CCB has a fully-fledged Fraud Prevention Policy that also addressed criminality.<sup>56</sup> It aims to make losses due to fraud and corruption intolerable and will institute training covering these aspects. It states that criminal activities would more likely be internally induced, and feels that the Department's guidelines in this regard are sufficient to deal with the issue.<sup>57&58</sup> It further states that in the case of significant corporate functions at the Castle, it sources additional private security that is paid for by the client. The upgrading of the CCTV camera system will further enhance our capability to manage safety and security.<sup>59</sup>

#### **Potential BRRR Questions:**

- The Committee may enquire what kind of training does the CCB employees undergo and whether the training is sufficient to arm employees with the necessary knowledge and skills to prevent fraud and corruption.
- The CCB can be asked to appraise the Committee of the kind of criminal activities that they believe can be internally induced and whether there are specific plans in place to address these?

# 6. HUMAN RESOURCES

As indicated earlier the CCB saw the departure of three managers and two other personnel members during the period under review. It also states that, given the fact that the organisation does not have a dedicated Human Resources Unit, they envisage a complete review of the Human Resources policies and structure of the CCB for the new financial year.

It had a team comprising 13 full-time CCB remunerated staff members at the end of FY 2019/20. As in the past FY, they have access to three (3) museum artists, who are remunerated and performance managed by the



Department of Defence, and are thus not included in the Human Resources Table. These members are complemented with short-term contract staff, interns (35) and additional casual staff employed to assist during the peak tourism season as well as ten (10) members of the DOD-funded gardening maintenance team. <sup>60</sup>

### **Potential BRRR Questions:**

- The Committee may want to ask questions around the departure of the five members during the FY2019/20,<sup>61</sup> as well as five members in the previous FY 2018/19, to determine whether the CCB's institutional culture is conducive to the retention of staff members or whether there are other factors that led to the loss of 10 staff members over 2 years
- What measures are in place to retain staff as stability in this regard is important to stabilise the human resources component?
- Despite the departure of ten staff members over the past two years, the CCB performed very well against set targets in the year under review. This raises a question whether the current Human Resources structures are aligned with actual needs. Simply put, it seems like the CCB is able to do more with less staff, which should be considered in tis future planning as well as its funding requirements.

### 6.1 **Performance rewards**

Table 15 on page 42<sup>62</sup> of the draft annual Report for FY2019/20 indicates that no performance rewards were paid to members of the CCB for the period under review, the second year in a row. <sup>63</sup> This as opposed to the FY2017/18 when the rewards amounted to R386 553<sup>64</sup> and R368 935 in FY2016/17.<sup>65</sup>

### Potential BRRR Questions:

• The CCB should be commended for forfeiting their performance rewards for the second year running, especially given the current financial constraints.

# 7. CONCLUSION

The CCB highlights various achievements which should be commended. This includes the completion of the DOD-funded Integrated Conservation Management Plan, attracting a significant number of tourists, and managing to self-generate R5 516 780. The fact that there is no irregular spending, no unauthorised expenditure and no fruitless and wasteful expenditure for the third year running, is also commendable. A worrying factor is that 10 people have left the organisation over the last two years, including managers, and reasons around their departure should be investigated and addressed. Of further concern, is the under collection in revenue regarding Rental income and Interest income, the *Going concern* status of the entity, as well the fact that the Responsible Revenue Generation Plan has not yet delivered on its "promises." The CCB should further be encouraged to enhance its efforts towards achieving the UNESCO status as well as tackling the safety and security of visitors and assets.

<sup>1</sup> CCB, 2020. Castle Control Board Annual Report FY 2019/20. p. 14 and CCB, 2019. Castle Control Board Annual Report FY 2018/19. p. 13.

<sup>2</sup> CCB, 2020. Castle Control Board Annual Report FY 2019/20. p. 8 and CCB, 2019. Castle Control Board Annual Report FY 2018/19. p. 8

<sup>3</sup> CCB, 2020. Castle Control Board Annual Report FY 2019/20. p. 14 and CCB, 2019. Castle Control Board Annual Report FY 2018/19. p. 13.

<sup>4</sup> CCB, 2020. Castle Control Board Annual Report FY 2019/20. p. 19 and CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 21

<sup>5</sup> CCB, 2020. Castle Control Board Annual Report FY 2019/20. p. 8

<sup>6</sup> CCB, 2020. Castle Control Board Annual Report FY 2019/20. p. 7

<sup>7</sup> CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 8 and 10

<sup>8</sup> CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 7

<sup>9</sup> CCB, 2020. Castle Control Board Annual Report FY 2019/20. p. 7, 10 and 41



10 CCB, 2019, Castle Control Board Annual Report FY2018/19, p. 9 11 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p.7 and CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 7 12 CCB, 2019, Castle Control Board Annual Report FY2018/19, p. 11 13 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p.41 14CCB, 2020. Castle Control Board Annual Report FY 2019/20. p. 10, 19, CCB, 2019. Castle Control Board Annual Report FY 2018/19. p. 14 15 CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 19 16CCB, 2020. Castle Control Board Annual Report FY 2019/20. p. 10, 35, and 36 and CCB, 2019. CCC Annual Report FY2018/19. p. 11 17 CCB, 2020, Castle Control Board Annual Report FY 2019/20, p. 10 18 CCB, 2018. Castle Control Board Annual Report FY2017/18. p. 21 19 CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 24 20 CCB, 2020, Castle Control Board Annual Report FY 2019/20, p. 28 and 0CCB, 2019, Castle Control Board Annual Report FY 2018/19, p. 24 21 CCB. 2020. Castle Control Board Annual Report FY 2019/20, p. 28 and 0CCB, 2019, Castle Control Board Annual Report FY 2018/19, p. 24 22 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p. 28, Castle Control Board Annual Report 2016/17. p. 26. And Castle Control Board Annual Report 2017/18. p. 21. 23 Also see CCB, 2020. Castle Control Board Annual Report FY 2019/20. p. 12 24 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p. 28 25 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p. 32 26 CCB, 2018. Castle Control Board. Annual Report FY2017/18. p. 4 and 19. 27 CCB, 2018. Castle Control Board. Annual Report FY2017/18. p. 6 and 19. and CCB, 2017. Castle Control Board. Annual Report FY2016/17. p. 22 . 28 CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 24 29 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p. 27 30 CCB, 2020, Castle Control Board Annual Report FY 2019/20, p. 27 31 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p. 38 and 41 CCB, 2019. Castle Control Board Annual Report FY 2018/19. p. 35 32 CCB, 2018, Castle Control Board Annual Report FY2017/18, p. 28 and 95 33 CCB, 2018. Castle Control Board. Annual Report FY2017/18. p. 96. and CCB, 2017. Castle Control Board. Annual Report FY2016/17. p. 120/121. 34 CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 104 35 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p.46 and 49; and CCB, 2019. CCB Annual Report FY2018/19. p. 6 and 48 36 CCB, 2018. Castle Control Board. Annual Report FY2017/18. p. 3, 29, and 38. 37 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p. 49; and CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 48 38 CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 46 39 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p.10 40 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p.9 and CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 53 41 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p.48 42 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p.50 43 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p.21 - 27 44 CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 117 45 CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 20 46 CCB, 2018. Castle Control Board. Annual Report FY2017/18. p. 17. 47 CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 23. 48 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p 30 and CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 28 - 38. 49 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p 32 and CCB, 2019. Castle Control Board Annual Report FY 2018/19. p. 31. 50 CCB, 2018, Castle Control Board, Annual Report FY2017/18, p. 3 51 CCB, 2018, Castle Control Board, Annual Report FY2017/18, p. 3 52 CCB, 2018. Castle Control Board. Annual Report FY2017/18. p. 3. and CCB, 2017. Castle Control Board. Annual Report FY2016/17. p. 4 53 See for instance DOD Annual Report 2015/16, p. 103 to 106. and DMV Annual Report 2015/16, p. 52 - 53. 54 CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 10 55 CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 10 56 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p 35 57 CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 35 58 CCB, 2018. Castle Control Board. Annual Report FY2017/18. p.26, Castle Control Board Annual Report 2015/16. p. 33. 59 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p 35 60 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p 41. 61 CCB, 2020, Castle Control Board Annual Report FY 2019/20, p 41 62 CCB, 2020. Castle Control Board Annual Report FY 2019/20. p 42. 63 CCB, 2019. Castle Control Board Annual Report FY2018/19. p. 41. CCB, 2018. Castle Control Board. Annual Report FY2017/18. p. 85 65 CCB, 2017. Castle Control Board. Annual Report FY2016/17. p. 103