
Investigation Report Into Vehicle Lift Faults Within DVA MOT Test Centres



Contents

1	Executive Summary	1
2	Introduction and Investigation Approach	3
3	Background	4
4	Identification of the Faults	6
5	Assessment of the Faults	7
6	Remedial Repair Programme	9
Appendix 1	Work Performed	11
Appendix 2	Summary of Thorough Examination Inspections	12
Appendix 3	Timeline of Events	14

Executive Summary

Introduction

1.1 Following fault / safety issues identified in relation to vehicle lifts in MOT Test Centres operated by the Northern Ireland (NI) Driver and Vehicle Agency (DVA), the NICS Group Internal Audit and Fraud Investigation Service (GIAFIS) was commissioned to complete an investigation to establish the circumstances which led to the discovery of the faults and the subsequent actions taken to communicate and resolve the matter.

Background

1.2 Over one million MOT tests are completed in NI annually and a car MOT test cannot be completed without the use of a vehicle lift. These lifts must not only remain operational but must also be safe to use. The vast majority of vehicle lifts currently used for MOT testing were installed between 2011 and 2013 by MAHA. MAHA have been contracted from 2013 to maintain these lifts to a safe and serviceable condition. In addition, an independent inspection is carried out every 6 months to detect any defects that are, or might become dangerous. Under the contract between MAHA and DVA, MAHA engaged an independent body, HSB Engineering Insurance (HSB), to carry out these inspections.

1.3 DVA are currently undertaking a major transformation programme, part of which will see all testing equipment eventually replaced. It is intended that the new testing equipment will begin to be installed from 2022. As part of the strategy to move to the new arrangements, DVA considered the age and level of usage of the existing vehicle testing equipment. This evaluation was informed by a vehicle test equipment condition survey (completed by MAHA in October 2018) which indicated that, while showing signs of wear and tear, the lifts were generally in good condition and that replacement components would be available for the foreseeable future.

1.4 A decision was subsequently taken not to undertake a major refresh programme of lifts but to instead continue to use the existing equipment until it reached “its absolute life end”, at which point it would be replaced. DVA did not determine the projected absolute life end for the lifts (absolute life end is affected by usage and this varies for each lift).

Summary Findings

1.5 In light of the ongoing maintenance and independent inspection regime, DVA would not have expected such serious defects to be identified in 48 of 55 lifts in such a short period of time. Neither the regular maintenance programme nor the independent inspections had identified cracks until 6 November 2019 (at Larne Test Centre); when first identified this was viewed as a routine maintenance and repair issue.

1.6 In the 3 months prior to the Larne inspection, 35 lifts in 9 Test Centres had been independently inspected with no cracks identified. Inspections of the remaining 20 lifts identified cracks in 16 (including Larne lifts).

1.7 DVA were concerned that this was a more widespread issue than the programme of independent inspections had indicated and at a meeting on 3 January 2020 asked MAHA to urgently complete a lift condition survey for all Test Centres with the participation of the independent inspectors. DVA did not however specify a target date for this report, the content and detail of the report, or the role of the independent inspectors in this work. Consequently, the resulting report did not enable DVA to fully evaluate the potential outcome of further independent inspections which could impact operational delivery.

1.8 Management identified on 15 January 2020 that, following a lift at Boucher Road being taken out of service on 13 January 2020 because of identified cracks, this now represented an increased risk to the ability to deliver MOT testing and to the H&S of staff.

1.9 MAHA proposed a solution to address the cracks involving a welding repair to be made by a sub-contractor. It was reasonable for DVA to rely on the solution proposed by MAHA as they are the manufacturer of the lifts.

1.10 DVA believed that the repairs of all affected lifts could be made with minimal impact on operations following successful remedial repairs made at Boucher Road. As a result they continued to manage the issue as a routine maintenance and repair issue.

1.11 The repair programme was rolled out (17-24 January 2020) and the available documentation indicates that this process was largely driven by MAHA. During this time, the risk to operations started to materialise once repaired lifts began to fail independent inspections.

1.12 Once unrepaired lifts also began to fail independent inspections, the DVA Health and Safety (H&S) Manager raised concerns that these lifts were continuing to be used when inspections had identified safety concerns in lifts with similar cracks. On 22 January 2020, a decision was taken by DVA senior management to withdraw from service any lift with cracks which had not been repaired and passed a subsequent independent inspection.

1.13 At a meeting on 27 January 2020, the independent inspectors could not provide assurance to DVA that the lifts were safe to use following the repairs and this resulted in the use of all lifts being suspended that evening.

General Comment

1.14 Throughout this process there were a number of instances where key discussions and key decisions were not formally documented. We consider that, although the standard of record management in certain areas such as fault logging / H&S was of a good standard, the overall standard of record management observed was generally less than satisfactory.

Introduction and investigation approach

Introduction

2.1 Following fault / safety issues identified in relation to vehicle scissor lifts (referred to in this report as the “lifts”) in MOT Test Centres operated by the Northern Ireland (NI) Driver and Vehicle Agency (DVA), the Minister instructed the DfI Permanent Secretary to commission two reviews; the first around the timeline of events which led to 55 lifts being taken out of operation within 15 MOT Test Centres and the second around the steps which need to be taken to return the MOT Test Centres to full service operation.

2.2 The NICS Group Internal Audit and Fraud Investigation Service (GIAFIS) was commissioned to complete the first review and this report sets out the findings.

Objective

2.3 The objective of this investigation was to establish the circumstances which led to the discovery of the faults within the lifts in the MOT Test Centres and the subsequent actions taken to communicate and resolve the matter.

Investigation Approach

2.4 An investigation team was established comprising of experienced senior individuals across GIAFIS to undertake this investigation. The following approach was taken:

- Gain access to all relevant documentation and identify key DVA staff;
- Undertake a review of all records identifying relevant information;
- Conduct visits to MOT Test Centres to discuss the issues with centre management;
- Complete a series of fact finding interviews with key DVA staff;

- Analyse the information gathered to:
 - Understand when the issue was first identified, how the significance of the issue was assessed and how this was communicated;
 - Determine what actions were taken to resolve the issue including the role of both DVA and the Supplier; and
 - Confirm and understand how the operational management of the maintenance contract impacted on this issue; and
- Report on our findings.

2.5 Further details of work completed can be found at Appendix 1.

Background

MOT Testing

3.1 The MOT test in NI is an annual test of vehicle safety, roadworthiness and checking of exhaust emissions for most road-going vehicles over four years old. These vehicle tests are carried out at 15 MOT centres operated by DVA. Approximately one million vehicle tests are completed in NI each year.

3.2 Lifts are used to enable inspections to be completed of the under body of vehicles, a key element of the MOT test. There are currently 57 lifts within the 15 MOT Test Centres, which includes two recently purchased. This review covers the 55 lifts in operation at 6 November 2019.

3.3 It should be noted that without a lift the under body inspection of a car cannot be carried out and the MOT test cannot be completed.

3.4 Lifts need to be operational but must also be safe to use. The section below sets out the arrangements in place within DVA to ensure that lifts are serviceable and safe.

Current Maintenance Arrangements for Lifts

3.5 Lifts within MOT Test Centres are owned by DVA and were manufactured and installed by MAHA over an 18 month period between 2011- 2013.

3.6 Since 2013 MAHA has been contracted by DVA to supply and maintain MOT Vehicle Testing Equipment (referred to in this report as the “Maintenance Contract”). Under this Maintenance Contract, MAHA are required to ensure that all vehicle testing equipment (including lifts) are maintained to a standard which meets all DVA and legislative requirements, are in good repair and are in a safe and serviceable condition. A Planned and Preventative Maintenance (PPM) schedule is developed by MAHA to meet this requirement.

3.7 We examined and confirmed that a PPM schedule for 2019 had been agreed and completed by MAHA.

3.8 The PPM consists of 2 maintenance programmes which run on a rolling basis over a 12 month period. The first is an 8 Weekly Minor Routine Maintenance Programme and the second is a 6 Monthly Major Routine Maintenance Programme. They both include maintenance of the lifts.

3.9 There is a robust process in place within DVA to log and report faults and subsequently repair vehicle testing equipment, including lifts. DVA monitor the faults being reported to identify trends which may indicate issues around the effectiveness of the PPM or any underlying issues around the condition of the equipment.

3.10 We examined the faults recorded for 2018 and 2019 and noted that the nature of faults reported did not refer to cracks in lifts. DVA staff stated that they were satisfied with the standard of maintenance and repair of the lifts.

Future Arrangements

3.11 There is an ongoing Business Transformation Programme within DVA which involves the replacement of current vehicle testing equipment, including lifts. A contract for provision of new Test Centre equipment has been awarded to a new supplier and it is planned that the new equipment will be installed from 2022.

3.12 As part of the strategy to move to the new arrangements, DVA had considered both the age and the level of usage of the existing vehicle testing equipment. DVA accepted that there may be a need to replace or refresh the current equipment in the future. However, the intention was to only replace any lift that had reached “its absolute life end” and as a result, DVA had not developed a plan to undertake a major refresh programme of lifts. We note that, at this time, DVA had not determined the projected absolute life end for the lifts (absolute life end is affected by usage and this varies for each lift).

3.13 In October 2018, MAHA carried out a survey of all existing vehicle testing equipment, including lifts. This survey showed that the lifts, while showing signs of wear and tear, were generally in good condition. It was also noted that replacement components for lifts would be available for the foreseeable future.

3.14 DVA took assurance from the 2018 survey that a major refresh of lifts would not be necessary and did not anticipate the scenario where all lifts would be taken out of service at the same time.

Legal Requirements

3.15 The Lifting Operations and Lifting Equipment Regulations (NI) 1999 (LOLER) apply to the lifts and these regulations set out employer's responsibilities for ensuring that lifting equipment within the workplace is safe to use. The Regulations require that a Thorough Examination Inspection (referred to in this report as the "TE Inspection") is carried out at regular intervals (at least every 6 months). A TE Inspection is a systematic and detailed examination of the lifting equipment by a competent person to detect any defects that are, or might become dangerous.

3.16 Under the Maintenance Contract, MAHA are required, on behalf of DVA, to arrange these TE Inspections. MAHA engaged an independent body, HSB Engineering Insurance (referred to in this report as "HSB"), to carry out the TE Inspections. MAHA is also responsible for notifying DVA immediately of any fault together with their proposed course of action and timeframe for rectification of the fault and re-inspection.

3.17 If a defect is identified during a TE Inspection, the Inspector must classify the fault as follows:

- Category A: A defect which is a danger. This should result in the immediate cessation of use of the equipment; or
- Category B: A defect which is not yet but could become a danger. The Inspector should specify the time by which the fault could become a danger and the actions required to remedy it.

3.18 Following each TE Inspection, the Inspector produces a report setting out the findings. We noted that in most instances, if a Category A or B defect is identified by the Inspector, a Serious Defect Report is issued at the time of inspection (normally to the Test Centre Manager).

3.19 We confirmed that the TE Inspections had been completed as required for all 55 lifts across 15 Test Centres within each of the following periods:

- 30/01/2019 – 09/07/2019;
- 24/07/2019 – 03/01/2020; and
- 13/01/2020 – 24/01/2020 (this was an extra-ordinary programme of inspections due to the issues identified).

(See Appendix 2 for details of TE Inspections)

Health and Safety (H&S) Checks

3.20 DVA also complete a programme of daily and quarterly checks across their MOT Test Centres. Furthermore there is an annual programme of risk assessments at each MOT Test Centre site.

3.21 There is also a programme of H&S audits to determine the level of conformity with the DVA H&S arrangements.

3.22 The purpose of these H&S checks is to ensure that there is a safe working environment in place, however, it is not reasonable to expect that the cracks in lifts would be identified through these checks.

Identification of the Faults

4.1 A round of the 6-monthly TE Inspections commenced on 24 July 2019 with a total of 35 lifts within 9 Test Centres being examined up to 30 October 2019. None of these inspections identified any Category A or Category B defects or made reference to cracks in lifts.

4.2 The first time cracks were identified in lifts was on 6 November 2019 during a TE Inspection conducted at Larne Test Centre.

4.3 The Inspector's report identified Category B defects (fatigue cracks) in 2 of the 3 lifts examined. A timescale for repair was recorded for each lift; 14 days (by 20 November 2019) and 21 days (by 27 November 2019) respectively. There was no record within DVA that a Serious Defect Report was provided at the time of this inspection.

4.4 The Larne TE Inspection report (dated 11 November 2019) was provided to MAHA in line with established practice and issued to DVA Contract Management and Procurement Unit (CMPU) by MAHA in an email on 25 November 2019. Contained within this email was an exchange between MAHA and HSB where MAHA advised that they had no immediate concern regarding the safe operation of the lifts at Larne. This is significant as it does not recognise the importance of the repair dates recorded on the TE Inspection reports.

4.5 By the date DVA received the Larne TE Inspection report (25 November 2019), the first 14 day repair deadline had passed and there were only two days remaining of the 21 day repair deadline.

4.6 At this stage CMPU were treating this as a routine maintenance and repair issue.

4.7 After the Larne TE Inspection, inspections continued to be completed until 3 January 2020 at the remaining 5 Test Centres (a total of 17 lifts). Cracks were identified within 14 lifts, however, only one of the lifts (Lisburn Test Centre) was rated as Category B. No timescale for repair of the Category B defect was stated by the Inspector.

4.8 Consequently at 3 January 2020:

- No Category A defects had been identified in lifts;
- Category B defects had been identified in 3 lifts;
- Cracks had been noted for 13 lifts but had not been categorised as A or B defects; and
- 39 lifts had no cracks identified.

4.9 Internal correspondence within DVA on 23 December 2019 shows that MAHA were seeking a meeting in early January 2020 to discuss repairs of the cracks in the lifts. The correspondence also indicates that, at this stage, a repair had already been carried out in the Lisburn Test Centre without prior notification/approval by CMPU.

4.10 A meeting was arranged for 3 January 2020 and was attended by MAHA and DVA staff from CMPU, H&S and Operations. We note at this time that:

- DVA staff were concerned that this was potentially a more wide-spread issue than the TE Inspections currently indicated but was still viewed as a routine maintenance and repair issue;
- MAHA made reference to the lifts having completed more than the expected cycles and, therefore, were close to the end of their service life; and
- DVA staff requested MAHA, as a matter of urgency, to complete a lift condition survey for all sites with the participation of HSB.

4.11 We note that at the meeting of 3 January 2020 DVA did not specify how MAHA would categorise any faults found (ie in the same way as TE Inspection reports) or the role of HSB. Furthermore there was no target date agreed for the production of the lift condition survey.

4.12 Following the meeting on 3 January 2020 the Director responsible for H&S within DVA was advised of the outcome of the meeting.

Assessment of the Faults

5.1 As agreed, following the meeting of 3 January 2020 MAHA conducted the survey of lifts until 14 January 2020.

5.2 Internal correspondence during this period indicates that MAHA proposed a welding solution to repair the cracks (to be completed by a sub-contractor). We consider that it was appropriate for MAHA, as the manufacturer, to determine what was required to repair the cracks and to ensure that the repairs were properly made. MAHA advised however, that any repair would only be a temporary solution.

5.3 On 13 January 2020, a TE Inspection was undertaken on 3 of the 7 lifts at Boucher Road Test Centre which resulted in one of the lifts being immediately taken out of service because of a Serious Defect Report (Category A). This was an important development as this was the first time cracks found in a lift had led to the lift being taken out of service immediately. It is clear that, from this point, the capability of DVA to deliver MOT Test could be seriously disrupted.

5.4 From 13-16 January 2020, DVA, MAHA and HSB continued to engage regarding the repairs to the cracks in the lifts. The documents reviewed and discussions held with management would indicate that:

- Boucher Road was used as a pilot to test the suitability of the repair; and
- If this was found to be suitable, the same repair would be applied to all affected lifts.

5.5 On 14 January 2020 a Service Meeting was held between DVA staff and MAHA. The minutes record that MAHA advised that various degrees of cracking had now been identified in 51 of 55 lifts. It was also noted that a lift had been shut down for the first time (Boucher Road) and that a programme of repair was to be completed and the lifts re-inspected. MAHA highlighted that the repairs were not permanent and may only last a few months and that further cracks could appear elsewhere on the lifts.

5.6 In the afternoon of 14 January 2020, the Director responsible for CMPU was provided with a summary of the Service Meeting which he forwarded to the rest of the DVA senior management team on the morning of 15 January 2020.

5.7 CMPU received the lift condition survey (dated 14 January 2020) from MAHA on the afternoon of 15 January 2020 which highlighted:

- 48 of 55 lifts showed signs of cracking to varying degrees;
- The cracking was due to the high number of cycles conducted as these lifts have reached a life span which is more than 4 to 5 times higher than normal;
- A prioritised programme of repair was proposed; and
- This repair would only be a temporary solution.

5.8 CMPU forwarded the lift condition survey to the Director of Operations on the afternoon of 15 January 2020 who forwarded the Report to the DVA Chief Executive on the morning of 16 January 2020.

5.9 Within the lift condition survey, 37 lifts which had not previously had cracks identified were now reported as having cracks. However the severity of the cracks was not categorised in line with the TE Inspection criteria. In light of the Category A defect identified in Boucher Road on 13 January 2020, there was now a risk that cracks could lead to lifts being immediately taken out of use and the potential scale of this risk was not known at that time.

5.10 Internal email correspondence of 15 January 2020 highlights that DVA senior management now recognised that:

- DVA had 48 of 55 lifts with cracks with no useful assessment of how serious the cracks were; and
- Based on the 13 January shutdown of the Boucher Road lift, there was a risk that any of these lifts could be immediately taken out of service if independently inspected.

5.11 On 15 January 2020 a meeting was held between DVA and MAHA and no record was kept of this meeting. However, we were advised that senior managers from Operations, CMPU and H&S attended this meeting with MAHA to discuss the ongoing situation with the cracks in the lifts.

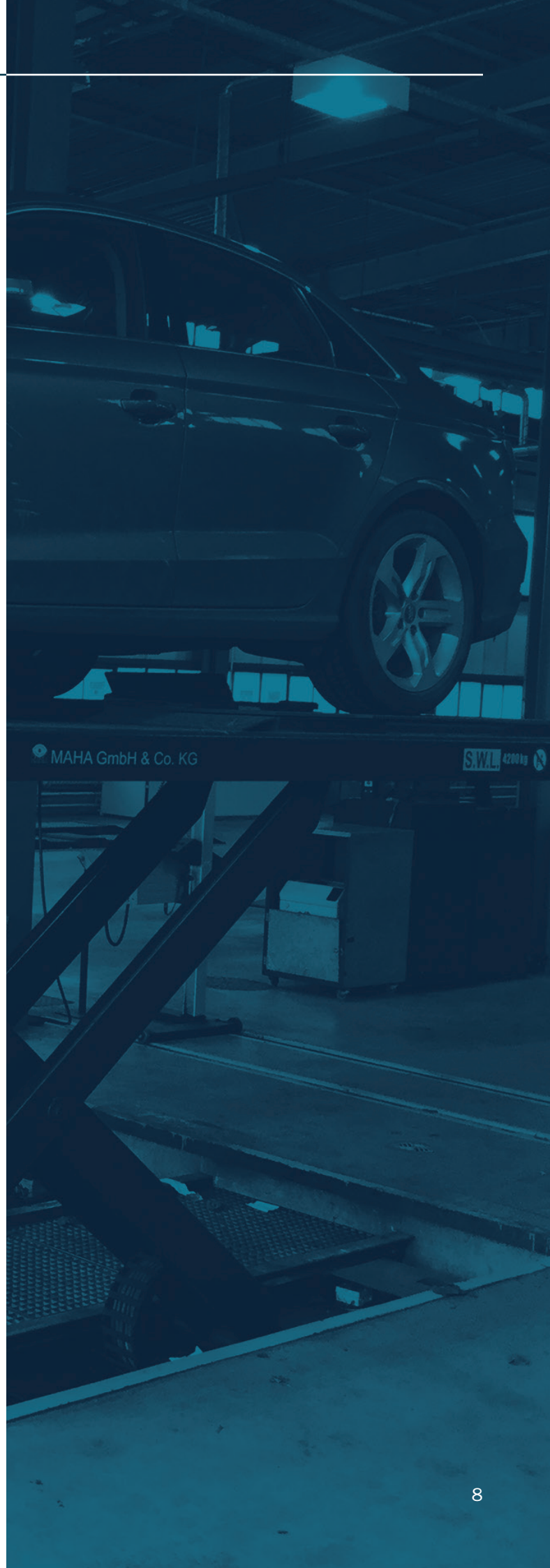
5.12 On 16 January 2020, TE Inspections were carried out on the remaining 4 lifts in the Boucher Road which had had a repair applied; no Category A or B faults were recorded on these 4 lifts.

5.13 As a result of the above, on 16 January 2020 we understand that there was an expectation by DVA that the repair made on the 4 lifts at Boucher Road would be successfully applied to all affected lifts with minimal disruption to services. No documented record of the decision to roll out the programme of remedial repairs could be found.

5.14 There is also no documented record to confirm that the repair to be applied to affected lifts was to be the same repair applied to the 4 lifts at Boucher Road prior to the 16 January independent inspection. The only documentation directly referring to the decision is set out in the paragraph below.

5.15 DVA staff were onsite at the Boucher Road on 16 January 2020 when this TE Inspection was carried out. A member of DVA staff outlined in an email to MAHA the discussions between DVA, MAHA and the TE Inspectors and asked that they confirm their understanding as follows:

- The Inspectors were content that repairs were satisfactory but temporary;
- The Inspectors were content that MAHA repeat the repairs on the remaining cracked lifts; and
- The previous Boucher Road Serious Defect Reports had been lifted.



Remedial Repair Programme

6.1 Following the repairs made at Boucher Road, a programme of repairs commenced at other Test Centres, planned to be completed by 28 January 2020. The programme of repairs was developed and agreed with MAHA and prioritised according to the nature of the cracks within the various Test Centres. We note that, despite the repair deadlines having passed in relation to the Category B defects identified in the Larne Test Centre (ie 20 November and 27 November 2019), the repairs in Larne were not scheduled to be completed until 21 January 2020.

6.2 The intention was that all repairs would be quickly followed up by a TE Inspection to evaluate the safety of the lift following the repair.

6.3 During this period, lifts continued to be used unless a Category A defect had been identified by a TE Inspection.

6.4 The period 16-24 January 2020 was a fast moving and constantly evolving period of repairs and TE Inspections and the available documentation indicates that this process largely seems to have been driven by MAHA. During this period, the schedule of repairs were not completed as planned because a number of TE Inspections were carried out before lifts had been repaired. This led to a number of lifts being taken out of service immediately, resulting in these lifts having to be prioritised for repair to bring them back into service. In addition, concerns started to emerge from the TE Inspections around the quality of the repairs which also resulted in Category A defects. This led to a further round of remedial work and re-inspections.

6.5 The DVA Chief Executive informed the DfI Minister and Permanent Secretary of the emerging issues around the cracks in lifts on 21 January 2020.

6.6 On 21 January 2020 the DVA H&S Manager raised concerns that lifts were continuing to be used at 4 Test Centres where current circumstances indicated that Category A defects would be identified based on the results of recent TE Inspections at other Test Centres.

6.7 As a result of these concerns being raised, on Wednesday 22 January 2020, a decision was taken by DVA senior management to withdraw any lift from service that had not been subject to repair and further TE Inspection; 10 MOT Test Centres were severely impacted. In addition, we also note that, by this time, the Larne Test Centre Manager had taken the 2 lifts with Category B defects out of service as no repairs had been made.

6.8 The Health and Safety Executive NI were advised of this decision on 22 January 2020.

6.8 On Friday 24 January 2020, HSB emailed DVA highlighting that the quality of the weld repairs observed through TE inspections was poor and that this was highly concerning.

6.9 On Saturday 25 January 2020 the DVA Chief Executive issued a letter to MAHA where he asked for "...a written response of MAHA's assessment as to how this issue has materialised so rapidly, why there were no indications of signs of cracking on the scissor arms of the lifts before November 2019". MAHA replied on 28 January 2020 advising that they had fulfilled their obligations under the contract, but did not address the question above.

6.10 On Monday 27 January 2020 (16:30) a meeting was held with DVA, MAHA and HSB. There was no formal record of the meeting taken, however, the DVA H&S Manager kept their own note of the meeting. The note indicates that HSB reiterated the concerns they had raised in their email of 24 January and could not provide assurance that the lifts were safe to use following repair.

6.11 The H&S Manager's note also indicates that HSB confirmed that the Category A defects which had been identified were appropriate.

6.12 During the meeting it was decided that a recommendation should be made to the DVA Chief Executive to suspend the use of all lifts with immediate effect (with the exception of 1 lift at Boucher Road and 2 lifts in Lisburn).

6.13 The decision to suspend the use of all 55 lifts was taken by the DVA Chief Executive on the evening of 27 January 2020 due to safety concerns.

6.14 This decision was communicated that evening.

6.15 An independent company (Elite) was subsequently commissioned by DVA to complete TE Inspections on 1 lift at Boucher Road, 2 lifts in Lisburn and 2 recently purchased lifts. These lifts were then put into operation during late January / early February 2020. These are the only lifts currently in operation.

6.16 We noted that the fault / safety issues relating to the lifts was first reported to the DVA Audit and Risk Assurance Committee (ARAC) on 28 January 2020.



Appendix 1

Work Performed

The investigation team reviewed the following:

- All relevant documentation (over 13,000 records) including;
 - Minutes of Contract Management meetings;
 - Minutes of Health and Safety Committee meetings;
 - Minutes of Senior Management Board meetings; and
 - Internal correspondence.
- Contract management arrangements / processes;
- Operational arrangements / processes;
- Health and Safety arrangements / processes;
- TE Inspection Reports completed for the period 30 January 2019 – 3 January 2020;
- PPM schedule for 2019 (including all 8 weekly and 6 monthly routine maintenance programmes);
- ‘Near Miss’ Reports for 2019; and
- All faults recorded and associated summary reports for 2018 and 2019.

The investigation team also:

- Completed fact finding interviews with key DVA staff including senior management; and
- Visited 4 MOT Test Centres.

Appendix 2

Summary of TE Inspections

Test Centre	Lift	TE Inspection Reports 30/01/2019 - 09/07/2019	TE Inspection Reports 24/07/2019 - 03/01/2020	Extra-ordinary TE Inspection Reports 13/01/2020 - 24/01/2020
Armagh	1			
	2			
Ballymena	1			
	2			
	3			
Boucher Road	1			
	2			Repair 2 days
	3			
	4			
	5			
	6			
	7			
Coleraine	1			
	2			
	3			
Cookstown	1			
	2			
	3			
Craigavon	1			
	2			
	3			
	4			
Downpatrick	1			
	2			
Enniskillen	1		Cracks noted	
	2		Cracks noted	
Larne	1		Repair 14 days	
	2		Repair 21 days	
	3			Repair 14 days
Lisburn	1		No timescale for repair stated	Repair 7 days
	2		Cracks noted	
	3		Cracks noted	
	4			
	5			

Londonderry	1		Cracks noted	Repair 7 days
	2		Cracks noted	Repair 7 days
	3		Cracks noted	Repair 7 days
	4			
Mallusk	1		Cracks noted	
	2		Cracks noted	
	3		Cracks noted	
	4		Cracks noted	
Newry	1			Repair 7 days
	2			
	3			
	4			
Newtownards	1			Inspection not completed as lifts were taken out of service
	2			
	3			
	4			
	5			
	6			
	7			
	8			
Omagh	1		Cracks noted	
	2		Cracks noted	

Defect	Description	Key
Category A	Defects found which give rise to imminent danger and require attention immediately	
Category B	Defects found which could, in time, give rise to danger and required attention within the specified time period.	
None	General Comments only may be recorded	

Appendix 3

Timeline of Events

