



State Comptroller of Israel | Local Government Audit
Report | July 2024

The Urban Space

The Local Authorities Management of Public Playgrounds



The Local Authorities Management of Public Playgrounds

Background

A playground is designed for children's physical activity playing, typically including various dedicated play equipment such as swings, slides, carousels, and ladders. The playground develops the children's physical, motor, and social skills and is one of the most successful ways of spending quality time together. In the digital age, where children are increasingly engaged in online activities that could have detrimental effects, both physiological and psychological, including screen addiction, the need to make playgrounds an attractive option to draw children in and provide parents with a safe place for their children is growing. Although playgrounds are relatively safe, it is still important to closely supervise children, teach them various skills, guide them as needed, and maintain safety boundaries.

Throughout Israel, thousands of public playgrounds are spread out in open public spaces for use by the general public. According to the legislation and the standard¹, local authorities are in charge of the planning, installation, regulation, and maintenance of playgrounds within their jurisdiction and their supervision. Israeli Standard SI 1498, issued in 2006, applies to equipment and sites used for playing, including playgrounds. The Israel Standards Institute strives, among other things, to adopt international standards and write standards for products and services to protect users from defective products and ensure their safety and health. The Standardization Commissioner at the Ministry of Economy and Industry is authorized to enforce the safety of children in the public space, including the safety of playground equipment in public parks.

1 Israeli Standard SI 1498.



Key Figures

10

children died due to playground-related injuries in 2013–2023

**about
14,000**

children were admitted to emergency rooms due to injuries in playgrounds in 2013–2023

**over
50%**

of the playgrounds within two of the audited local authorities – **Shfar'am** and **Hof HaCarmel** – have no maintenance permits from the Standards Institute for 2023. In **Shfar'am**, no playground had maintenance permit

only 37

local authorities out of 257 have a maintenance permit, issued in their name as required in the Standards Institution of Israel Standard Mark Administration decision from May 2020. According to the decision the authorities should comply with this requirement by January 1, 2024

4,838

the average number of residents per playground in **Shfar'am** compared to 807 in **Tiberias**

**NIS 62
million**

invested by **Rehovot** in the construction and renovation of playgrounds in 2020–2023, compared to **Shfar'am**, which invested NIS 1.2 million; **Hadera**, which invested NIS 6.5 million; and **Tiberias**, which invested NIS 16 million

**about
98%**

of **Rehovot's** playgrounds are shaded, opposed to 40% of **Hadera's** playgrounds and 45% of **Tiberias'** playgrounds

**only
about
55%**

of the residents' opinion survey respondents indicated that their nearest playground is safe



Audit Actions


 From May to September 2023, the State Comptroller's Office audited the local management and supervision of playgrounds within their jurisdiction. The audit focused on user correspondence, construction, maintenance, and customization. The audit was conducted in six local authorities: the municipalities of **Hadera, Tiberias, Rehovot, and Shfar'am**, the **Ramat Yishai** local authority, and the **Hof HaCarmel** regional council (the audited local authorities). Additional examinations were conducted at the Israel Standards Institute and the Standardization Commissioner at the Ministry of Economy and Industry (the Standardization Commissioner). Furthermore, the audit team visited 24 playgrounds within the jurisdiction of the audited local authorities (the sampled playgrounds), and carried out a public participation survey through phone and online questionnaires among 437 respondents residing in the audited local authorities to map their opinions and satisfaction levels regarding the playgrounds (the residents' opinion survey).


Key Findings


-  **Adoption of International Standards** – since 2011, the Standards Institute has periodically held discussions on adopting European standards changes. However, as of the audit's conclusion, the Israeli standard had not been updated or aligned with the standards and changes made to the European standards. This includes in 2017, 2019 and 2020, for example, regarding the update of the Israeli standard for new play facilities (definitions, requirements, and tests).
-  **Injuries in Playgrounds, Insurance, and Accident Reporting** – in 2013–2023, about 14,000 children were injured in playgrounds and admitted to emergency rooms, most (about 81%) due to falls, blows, or injuries. Despite the requirement in the Israeli standard, **Hadera, Tiberias, Rehovot, Shfar'am, and Ramat Yishai** failed to record detailed information about accidents that occurred in playgrounds within their jurisdiction. The audited local authorities have third-party liability insurance; however, there are differences, such as in the insurance coverage limits.
-  **Master Plan for Public Spaces** – despite the importance of a master plan for public open spaces (Shatzapim), the audit found that **Hadera, Tiberias, Shfar'am, Ramat Yishai, and Hof HaCarmel** had not prepared a master plan for public spaces within their jurisdiction. The absence of a master plan for public spaces may lead to suboptimal



use of public spaces within the authority's jurisdiction and harm the prioritization of their use.

 **Allocation of Public Open Spaces for Public Use** – the professional guide for allocation of public spaces, published by the Planning Administration in 2016, requires that the allocation of public spaces per resident be an average of 10 square meters. However, the audit found that the **Rehovot** and **Shfar'am** failed to meet this guideline, with public spaces allocated at eight square meters and five square meters per resident, respectively. In contrast, **Hadera**, **Tiberias**, and **Ramat Yishai** comply with the guidelines, allocating 14, 31, and 19 sqm per resident, respectively. A lower allocation than that specified in the guide could harm the residents' quality of life and well-being.

 **Number of Playgrounds According to the Number of Residents** – the audit found that in **Hadera**, **Rehovot**, and **Shfar'am**, the number of residents per public playground is relatively high – 1,374, 1,322, and 4,838 respectively, while in **Tiberias**, the number of residents per playground was 808, in **Ramat Yishai** – 738, and **Hof HaCarmel** – 553. The audit also raised that the average number of children per playground in **Rehovot** and **Shfar'am** was 358 and 1,146, respectively, while in **Hof HaCarmel** and **Ramat Yishai**, the number of children per playground was 147 and 176, respectively. The higher the number of children per playground in a particular area, the more it could adversely impact their enjoyment and the effective use of public space. Furthermore, a State Comptroller's Office residents' opinion survey indicated that in **Hadera**, **Rehovot**, and **Ramat Yishai**, most respondents noted that walking to the nearest playground is less than 10 minutes. Conversely, in **Tiberias**, about a quarter of the respondents (11) indicated that walking to the nearest playground takes more than 10 minutes. In **Shfar'am**, 51% of respondents (31) stated that there is not even one playground near their home and that they must drive to the nearest playground.

 **Permits for the Maintenance of Playgrounds** – although the Standards Order (Mandatory Standard Mark), 1981, requires that playground equipment and its maintenance have a permit from the Standards Institute, the audit raised that as of the audit's conclusion, **Shfar'am** had not obtained a maintenance permit for playgrounds within its jurisdiction, and the nine playgrounds within its jurisdiction were without a maintenance permit. Additionally, it was found that although the requirements procedure² mandates that the maintenance permit include all playground sites under their owner's responsibility and report any changes to the Standards Institute, the maintenance permits issued to the subcontractors engaged with **Hadera**, **Rehovot**, **Ramat Yishai**, and **Hof HaCarmel**, as well as the maintenance permit issued to **Tiberias**, did not include all the playgrounds within their jurisdiction. Over 50% of the playgrounds in **Shfar'am** and **Hof HaCarmel** were without a maintenance permit from the Standards Institute. In **Hof HaCarmel**, 40 playgrounds, 61% of the playgrounds,

2 M&O Procedure 1498 Part 7, Requirements for Site Owners, Maintenance Companies and/or Operators of Playground Equipment, Revision 2, updated in May 2022.



were without a maintenance permit. Without a maintenance permit, the Standards Institute, as the authorized body, does not supervise the playground, which could result in the playground not being maintained according to the required standards, potentially leading to defects that could endanger users of the playground equipment.

📌 Maintenance Permit in the Name of the Local Authority – in May 2020, the Standards Administration at the Israeli Standards Institute decided to change the supervision method for playground equipment and determined that starting January 2021, only the site owner could hold the permit, with the option given to the site owner to register the maintenance permit to their name by the beginning of January 2024³. Despite the above decision, the audit found that, as of its conclusion, 220 out of 257 local authorities in Israel (85.6%) still did not have maintenance permits in their name. None of the audited local authorities, except for **Tiberias**, had maintenance permits in their name.

📌 Quality Plan for Playground Maintenance – although the requirements procedure obligates site owners to prepare a quality plan for maintaining the playgrounds they are in charge of – a plan that addresses, among other things, the processes for identifying hazards and faults and methods for handling them, frequency of inspections, their format, and defines those in charge of carrying them out, including the establishment of schedules for regular maintenance activities – and although the requirements procedure requires the site owner to submit the plan for approval by the Standards Institute, the audit raised that three out of the six audited authorities – **Tiberias, Shfar'am, and Hof HaCarmel** – failed to prepare quality plans as required by the procedure's instructions; and that **Hadera, Rehovot, and Ramat Yishai**, did prepare quality plans, but the Standards Institute had not yet approved these.

📌 Periodic Inspections – although the requirements procedure obligates the site owner to conduct routine visual inspections on-site according to an inspection plan that sets an appropriate frequency for each playground, the audit raised that **Rehovot** prepared a monthly work plan for conducting routine visual inspections of playgrounds within its jurisdiction, but did not establish a customized plan for each playground. In **Hadera, Tiberias, Shfar'am, and Ramat Yishai** – no work plan was established, and no documentation was found to confirm that routine visual inspections were conducted in the playgrounds within their jurisdiction. Although the standard requires monthly inspections of playgrounds, the audit raised that monthly inspections were undertaken in neither the two playgrounds under the jurisdiction of **Tiberias** nor the five playgrounds under the jurisdiction of **Shfar'am**. Furthermore, although the standard requires annual inspections of playgrounds within the local authorities' jurisdiction, the audit raised that **Hadera, Tiberias, Rehovot, and Shfar'am** failed to conduct annual inspections in some of the playgrounds within their jurisdiction within the required 12-month period, according to the standard's requirements.

3 It has been reported that due to the security situation, this deadline has been extended until June 2024.



Supervision by the Hof HaCarmel Regional Council – Hof HaCarmel failed to supervise the maintenance of the playgrounds within its jurisdiction and did not monitor the local committees' handling of the playgrounds. **Hof HaCarmel** also failed to supervise the execution of periodic maintenance inspections of the playgrounds, nor did it follow up on the repair of defects identified in the safety survey of the playgrounds it conducted in 2020.

A Discrepancy Between the Number of Playgrounds in the Authorities and the Number Approved by the Standards Institute – although the requirements procedure mandates that the maintenance permit include all playground sites under the site owner's responsibility and report any changes to the Standards Institute, in all audited local authorities there was a discrepancy between the number of playgrounds according to the local authorities' data and the number of approved playgrounds according to the Standards Institute's website. For example, in **Rehovot** and **Hof HaCarmel**, there are significant discrepancies between the number of playgrounds according to the local authorities' data and the number of approved playgrounds according to the Standards Institute's website – 85 and 40 playgrounds, respectively. In **Hadera**, there is a discrepancy of 15 playgrounds; in **Tiberias**, 17 playgrounds; in **Shfar'am**, nine playgrounds; in **Ramat Yishai**, three playgrounds.

Actions of the Supervisor of Standardization at the Ministry of Economy and Industry – in January 2021, the Supervisor sent a letter to all local authorities requesting an updated list of all playground sites in which playground equipment has been installed according to Standard 1498. The Supervisor asked for the names and addresses of the playgrounds, details of the maintenance entity, and a copy of the maintenance permit. Not all local authorities responded to the above letter, and neither did the Supervisor maintain a computerized and concentrated record indicating which local authorities responded each year nor concentratedly filed the documents received from the local authorities to control and follow-up efficiently. As a result, the Standards Administration lacks comprehensive data on the number of public playgrounds within the local authorities' jurisdiction, nor does it have information about their characteristics, locations, and contents. Additionally, the Standards Administration failed to enforce the sanctions under the Standards Law, 1953 against local authorities that did not provide information on the playgrounds within their jurisdiction. The audit also found that the Standards Administration does not have a work plan that includes the names of the local authorities where inspections will be conducted or a detailed list of the playgrounds to be inspected in each authority. **Management of a Database for Proactive Inspections and Follow-up on the Rectification of Deficiencies** – the information on the proactive inspections performed by the Standards Institute at the request of the Standards Administration and the data on the deficiencies found are not available to the Standards Administration. The Standards Administration lacks concentrated information on the deficiencies found in inspections and the Supervisor of Standards enforcement actions. This hinders organized following-up on the deficiencies rectification and



obtaining a national situation report on the safety status of playgrounds in local authorities.

Accessibility of Playgrounds for People with Disabilities – the highest rate of accessible playgrounds among the audited local authorities was in **Tiberias**, at about 82% (49 playgrounds). **Hadera**, **Rehovot**, and **Hof HaCarmel** ranged from 30% to 45% (27, 51, and 20 playgrounds, respectively). In contrast, the local authorities with the lowest rate of accessible playgrounds were **Ramat Yishai** and **Shfar'am**, with less than 30% (three accessible playgrounds in **Ramat Yishai** and two in **Shfar'am**). During site visits to playgrounds sampled in **Tiberias**, **Shfar'am**, and **Hof HaCarmel**, accessibility issues were observed in playgrounds for people and children with disabilities, even though these authorities had declared in their accessibility statements that the playgrounds were accessible. Furthermore, the audit found that although the Equal Rights for People with Disabilities Regulations (Accessibility Adjustments to Public Spaces Not in a Building), 2013, require local authorities to publish a list of accessible playgrounds on their websites and in their offices, **Ramat Yishai** and **Hof HaCarmel** did not publish on their websites a list of accessible playgrounds in their jurisdiction or statements that includes accessible playgrounds.

Safety of the Playground Equipment in the Sampled Playgrounds – in the following four playgrounds within **Tiberias**, **Rehovot**, **Shfar'am**, and **Hof HaCarmel**, inspections conducted by the State Comptroller's office raised deficiencies in playground equipment that could pose a risk to users: a broken see-saw in the community center playground in **Tiberias**; a torn swing in the Shmuel Gorodiski (Plastic) Playground in **Rehovot**; a broken handle, broken chains on two swings, and torn safety padding on the bird's nest swing in the city playground in **Shfar'am**; and a defect in the wooden bridge steps in Playground No. 1 in Ein Carmel within **Hof HaCarmel**.

Shading Playgrounds – over half of the playgrounds within **Hadera** and **Tiberias** were not shaded at the time of the audit, which could endanger users and diminish the quality and enjoyment of the use of these playgrounds. In **Hadera**, 22 out of the 46 unshaded playgrounds are located in statistical areas⁴ where the population is at level 4 or lower on the socioeconomic cluster scale⁵. In **Tiberias**, 19 out of the 33 unshaded playgrounds are in statistical areas where the population is at level 4 or lower on the socioeconomic cluster. In **Rehovot**, both unshaded playgrounds are within statistical areas where the population is at level 4 or lower on the socioeconomic cluster. In **Shfar'am**, seven of nine playgrounds have partial or complete shade, with the partially

4 A continuous area unit created from a geographic-statistical division of a settlement with more than 10,000 residents. The statistical areas are as small and homogeneous as possible geographic units, reflecting the unique characteristics of areas within the settlement. A statistical area typically contains 3,000 to 5,000 residents. This is the smallest geo-statistical unit for which official statistical data are published.

5 The index published by the Central Bureau of Statistics (CBS) ranks geographic units in Israel (settlements, local authorities, and statistical areas) into ten clusters based on the socioeconomic level of their populations (cluster 1 being the lowest).



shaded playgrounds adjacent. In **Ramat Yishai**, three of the 11 playgrounds are unshaded, while the shaded playgrounds are distributed throughout it.



Lighting and Basic Service Facilities in the Sampled Playgrounds – lighting – despite the Public Garden Planning Guide guidelines, which stipulate that all types of gardens must be fully and adequately lit, including access roads, seating areas, and pathways, throughout the night, one playground in **Ramat Yishai** lacks lighting; less than half of the playgrounds in **Tiberias** have lighting, and over half of the playgrounds in **Shfar'am** are only partially lit. However, it was found that all playgrounds in **Hadera**, **Rehovot**, and **Hof HaCarmel** have lighting; benches – all the sampled playgrounds had benches; trash bins – all the sampled playgrounds, except for one in **Tiberias**, had trash bins; drinking fountains – the audit raised that in **Hadera**, **Tiberias**, and **Shfar'am**, there were several playgrounds without drinking fountains: 28, 33, and 6, respectively. Additionally, several playgrounds in **Hof HaCarmel** lacked drinking fountains.



Shading of Playgrounds – **Rehovot** and **Ramat Yishai** shaded a significant proportion of playgrounds within their jurisdictions.

Adapting Playgrounds for Children with Allergies – in playgrounds in **Rehovot** and Tzrufa under the jurisdiction of **Hof HaCarmel**, signs have been installed asking visitors to avoid bringing food and snacks into the playground to protect children with allergies.

Smart Resuscitation Stations in Playgrounds – **Rehovot** has installed smart resuscitation stations (defibrillators) in nine playgrounds.

Key Recommendations



The Standards Institution should follow the provisions of the Standards Law, examine the adoption of changes made to European standards close to their date, and, accordingly, implement the necessary adjustments to the standard.



Hadera, Tiberias, Shfar'am, Ramat Yishai, and Hof HaCarmel should prepare a master plan for public spaces within their jurisdictions. **Hadera, Tiberias, Rehovot, and Shfar'am** should review all public spaces within their jurisdictions and their uses and consider expanding them in line with the 2016 guide's recommendations. Furthermore, **Hadera, Tiberias, Shfar'am, and Ramat Yishai** should assess the need to construct playgrounds in areas and neighborhoods that lack them in their vicinity and examine the feasibility of doing so in response to the needs of all residents.



- 💡 **Shfar'am** should obtain a maintenance permit from the Standards Institute for all playgrounds within its jurisdiction. **Hadera, Tiberias, Rehovot, Ramat Yishai, and Hof HaCarmel** should ensure that all playgrounds within their jurisdictions meet the conditions required for obtaining a maintenance permit from the Standards Institute and that the maintenance of playground equipment complies with the requirements outlined in the procedure. **Hadera, Shfar'am, Rehovot, Ramat Yishai, and Hof HaCarmel** should also obtain maintenance permits in their names as required.
- 💡 **Hadera, Tiberias, Rehovot, Shfar'am, and Ramat Yishai** should establish the required frequency for conducting routine visual inspections based on the characteristics of playgrounds within their jurisdictions. **Tiberias and Shfar'am** should conduct monthly inspections of all playgrounds within their jurisdictions, under the standard's requirements, to prevent playground accidents. **Hadera, Tiberias, Rehovot, and Shfar'am** should ensure that annual inspections are carried out on time per the standard's requirements.
- 💡 **Hof HaCarmel** should supervise the maintenance of playgrounds within its jurisdiction and monitor the local committees' handling of playgrounds, including implementing periodic maintenance inspections and rectifying any identified deficiencies. If necessary, it is recommended that additional surveys of the playgrounds be conducted beyond the 2020 survey.
- 💡 The Standards Administration and the Standards Institute, in cooperation with the Ministry of the Interior, as the regulator of local governance, should investigate why most local authorities have not yet transferred maintenance permits for playgrounds under their jurisdiction to their name. They should also work with the local authorities to promote the transfer of these permits, which is in line with the decision of the Standards Mark Directorate.
- 💡 It is recommended that the Standards Institute manage the information and document the inspections conducted by it in local authorities for up-to-date supervision of the scope of inspections by local authorities, their nature, the treatment they receive, and the deficiencies found. This includes documenting the follow-up on these inspections, for example, through computerized systems.
- 💡 The Supervisor of Standards should complete the data in its possession and establish a comprehensive database of all playgrounds under the jurisdiction of local authorities in Israel, thus effectively monitoring and supervising. In addition, the Supervisor of Standards should apply the sanctions available under the law to obtain any information or documents necessary to ensure the collection of data on playgrounds within the local authorities' jurisdiction or to facilitate the data collection process. Considering the established criteria, the Standards Administration should develop a multi-year sampling control plan to monitor its implementation. It should also control and monitor authorities that do not report on playgrounds within their jurisdiction or have not responded to its requests. The Supervisor of Standards should ensure enforcement of the law and standard requirements and verify that local authorities maintain all playgrounds within their jurisdiction with an approved



maintenance permit and according to the standard's provisions. It is recommended that the Supervisor of Standards publish details of playgrounds found to have deficiencies or that are not maintained according to a maintenance permit issued by the Standards Institute.



It is recommended that the Supervisor of Standards and the Standards Institute manage the data in their possession, including information on playgrounds, findings from inspections conducted, deficiencies identified, and those rectified, using data management systems, so that the information is current, concentrated, and accessible, enabling supervision and follow-up.



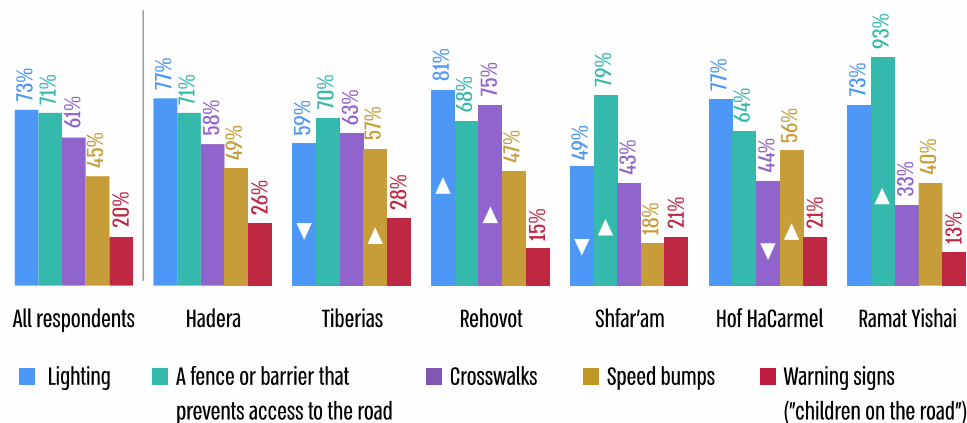
Ramat Yishai and the **Hof HaCarmel** should publish on their websites the lists of accessible playgrounds within their jurisdiction, in line with the regulations, to improve the service provided to the public. **Tiberias, Shfar'am, and Hof HaCarmel** should ensure that accessible playgrounds within their jurisdiction have access routes for people with disabilities and implement these adjustments. Due to the importance of shading playgrounds for the sake of users' health and enhancement of visitors' experience, it is recommended that **Hadera, Tiberias, Shfar'am, and Hof HaCarmel** shade additional playgrounds within their jurisdiction.



It is also recommended that **Tiberias, Shfar'am, and Hof HaCarme** consider restricting the entry of dogs into playground areas within their jurisdiction to prevent risks to the public visiting the playgrounds.



Residents' Attitudes Toward the Safety of Playground Environments



According to the findings of the residents' attitudes survey.

The survey results indicated that in all the audited local authorities, the rate of respondents who reported the presence of warning signs alerting children on the road was low. In all the audited local authorities, over 70% of respondents indicated that there is lighting in the playground near their home, except in **Tiberias** and **Shfar'am**, where the rate of respondents residing within their jurisdictions who reported the presence of illumination in the nearby playground were 59% and 49%, respectively.



Summary

Playgrounds help children develop motor skills and encourage social, emotional, and cognitive growth. Therefore, building high-quality, challenging, and safe playgrounds is essential. In 2013–2023, 10 children died due to playground-related injuries, and about 14,000 children were treated in emergency rooms for similar injuries.

The local authorities should address the deficiencies and consider the recommendations in this report. Among other things, they should construct playgrounds within their jurisdictions that are fairly and adequately distributed across the local authorities' area, maintain them, ensure their safety, and make them accessible to people with disabilities under the law. In addition, they should monitor the implementation of periodic maintenance inspections and rectify deficiencies to prevent injuries to visitors and protect residents' lives. The Supervisor of Standards at the Ministry of Economy and Industry should enforce the legal and regulatory requirements for playground maintenance, and the Standards Institute should supervise the playgrounds to ensure they comply with the relevant standards.

The Standards Administration, the Standards Institute, and local authorities, within their areas of responsibility should ensure that playgrounds are safe and adequately maintained, enabling visitors to enjoy them without being exposed to injuries and accidents that could endanger their lives. It is also recommended that the Supervisor of Standards publish information about playgrounds where deficiencies have been found and those that are not maintained according to the maintenance permit issued by the Standards Institute.