



Internal Oversight Division

Reference: IA 2016-07

Audit Report

Audit of WIPO Lex

September 26, 2016

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LIST OF ACRONYMS

ERM	Enterprise Risk Management
HRMD	Human Resources Management Department
IB	International Bureau
IP	Intellectual Property
IOD	Internal Oversight Division
OI	Office Instruction
UN	United Nations
WIPO	World Intellectual Property Organization
WTO	World Trade Organization

EXECUTIVE SUMMARY

1. IOD included an audit of WIPO Lex in its 2016 Oversight Plan based on discussions with the Global Infrastructure Sector and the Human Resources Management Department (HRMD) following a management change effected during March 2016.
2. While WIPO Lex remains a popular reference tool offered free-of-cost for public use, IOD observed that there are some serious concerns about the quality of data contained in the WIPO Lex database. These data errors, if left uncorrected, have the potential to impact WIPO's reputation as a provider of high quality IP reference tools. It is therefore imperative that management prioritize its attention on performing a systematic time-bound clean-up of the WIPO Lex database.
3. Additionally, management should also focus on the processes and systems for enhancing accuracy and timeliness of data entry. This includes adopting policies and standard operating procedures, identification and assessment of risks and putting in place a full-time quality control function.
4. Following the recent management change, human resource requirements of WIPO Lex Database need a thorough assessment based on the existing and future work plans. This could include, among others, the need for a full-time head for the WIPO Lex team as well as the use of flexible contractual arrangements, such as fellows.
5. While priority can be given to data quality issues in the short-term, longer term plans should be developed to find solutions to existing challenges. The development of a strategy for translation of WIPO Lex data into all WIPO official languages should be assessed in view of any future plans for expansion of WIPO Lex Database. For this, management should consider whether the existing technical platform on which WIPO Lex operates, is capable of supporting future expansion and meeting organizational needs.

1. INTRODUCTION

(A) BACKGROUND

6. WIPO Lex is an electronic database, which provides access to intellectual property (IP) laws and treaties of the Members of WIPO, the World Trade Organization (WTO) and the United Nations (UN). WIPO Lex is freely accessible to the public *via* WIPO's website (<http://www.wipo.int/wipolex>). WIPO Lex database was launched as a new web based database in 2010 which replaced an earlier version of CD-ROM, WIPO IPLEX. It also covers IP-related treaties administered by various multilateral and regional organizations as well as bilateral treaties¹, which contain IP-relevant provisions. WIPO Lex aims to provide legal information which is authoritative, comprehensive and up-to-date. Given the scope of coverage, the database is a work-in-progress and updating of entries is done on a continuous and regular basis.

7. WIPO Lex is a popular reference tool for IP laws and treaties. Server-side statistics available for the years 2015 and 2016 (January through June) indicate that an average of 230,000 unique visitors use the WIPO Lex database on a monthly basis. These visits resulted in 16.2 million page views in 2015 and 7.7 million pages in 2016 (year to June).

Table 1 – WIPO Lex Access Statistics 2015

Month	Unique visitors	Number of visits	Pages	Hits	Bandwidth
Jan 2015	179,991	353,629	942,814	3,962,991	129.54 GB
Feb 2015	192,884	367,452	1,096,232	4,314,901	148.99 GB
Mar 2015	228,965	453,519	1,496,491	5,380,427	185.85 GB
Apr 2015	219,706	423,652	1,249,057	4,885,877	163.79 GB
May 2015	236,674	445,554	1,847,556	5,679,201	192.81 GB
Jun 2015	218,321	415,533	1,262,350	4,733,795	307.14 GB
Jul 2015	192,906	382,037	1,172,519	4,310,043	318.88 GB
Aug 2015	191,049	370,454	1,250,407	4,358,776	313.39 GB
Sep 2015	234,875	435,879	1,402,212	5,181,639	359.66 GB
Oct 2015	273,260	506,627	1,422,423	5,811,097	388.97 GB
Nov 2015	270,865	498,930	1,603,987	5,891,116	395.11 GB
Dec 2015	214,612	421,643	1,524,147	4,726,230	321.79 GB
Total	2,654,108	5,074,909	16,270,195	59,236,093	3225.90 GB

Table 1 – WIPO Lex Access Statistics 2016

Month	Unique visitors	Number of visits	Pages	Hits	Bandwidth
Jan 2016	220,967	389,788	1,282,763	4,610,084	308.72 GB
Feb 2016	249,124	430,294	1,269,900	5,266,195	364.80 GB
Mar 2016	260,109	455,559	1,250,512	5,411,714	255.45 GB
Apr 2016	269,927	469,019	1,249,989	5,320,942	197.17 GB
May 2016	267,417	461,397	1,190,235	5,138,676	205.44 GB
Jun 2016	229,385	421,413	1,433,655	4,813,417	175.16 GB
Total	1,496,929	2,627,470	7,677,054	3,0561,028	1619.11 GB

¹ The update of bi-lateral treaties has been discontinued in WIPO Lex

8. WIPO Lex also serves to comply with the obligations of the International Bureau (IB) of WIPO under article 24(2) of the Berne Convention and 15(2) of the Paris Convention which require that the IB assemble and publish information concerning the protection of copyrights and industrial property respectively. Furthermore, it also contributes to WIPO's compliance with its agreement with the WTO concerning access to Laws and Regulations maintained in the WIPO Collection.

9. Although, WIPO Lex appears as a single source in the WIPO public website, the technical structure at the back-end is more complex. WIPO Lex consists of two separate databases, the Laws database which is a collection of IP related laws and other legal texts which are organized by country. The treaties database is a collection of IP related treaties administered by various multilateral and regional organizations. These two databases were developed separately and built on different technical platforms. The dual technical structure of WIPO Lex database makes further improvements very difficult.

10. A team of WIPO Staff Members (the WIPO Lex team) maintains WIPO Lex with assistance from the Communications Division and external contractors as required. Until March 2016, the WIPO Lex team operated under the Laws and Treaties Section within the Office of the Legal Counsel.

11. In March 2016, an internal reorganization was effected whereby the WIPO Lex team was moved from the Office of the Legal Counsel to the Global Infrastructure Sector, and a new arrangement was made by the latter Sector to split the responsibilities of WIPO Lex into two parts, namely (1) WIPO Lex database maintenance to a newly created Laws and Treaties Database Section within the Global Databases Division supervised by Mr. Mazenc, Director of the Division, and (2) WIPO Lex promotion and external relations to Mr. Matveev, Senior Counselor, who reports directly to Assistant Director General of Global Infrastructure. The transfer and reorganization were made in order to realign WIPO Lex to WIPO's global databases and also to address HR issues.

12. Following the management change in the WIPO Lex team, based on discussions with the Global Infrastructure Sector and the Human Resources Management Department (HRMD), an audit of WIPO Lex was included in IOD's 2016 workplan.

(B) OBJECTIVES

13. The objectives of the audit were limited in scope and focused on current technical and operational issues concerning WIPO Lex database including:

- (a) An assessment of the completeness and accuracy of data in the database and quality mechanisms for ensuring the completeness and accuracy of the data; and
- (b) A review of the Program and Budget expected results and performance indicators and the adequacy of human and financial resources for the maintenance of WIPO Lex.

(C) SCOPE AND METHODOLOGY

14. The audit scope included the Laws and Treaties databases of WIPO Lex as they existed in May-June 2016.

15. The audit fieldwork included:

- (a) Interviews with key personnel in the WIPO Lex team and the Global Databases Division;

- (b) Performing walkthroughs with the assistance of relevant personnel to understand the key processes;
- (c) Examination of a sample of records to test operational controls around management of WIPO Lex data; and
- (d) Review of policies and procedures concerning WIPO Lex operation.

16. The audit was performed in accordance with the International Standards for the Professional Practice of Internal Auditing.

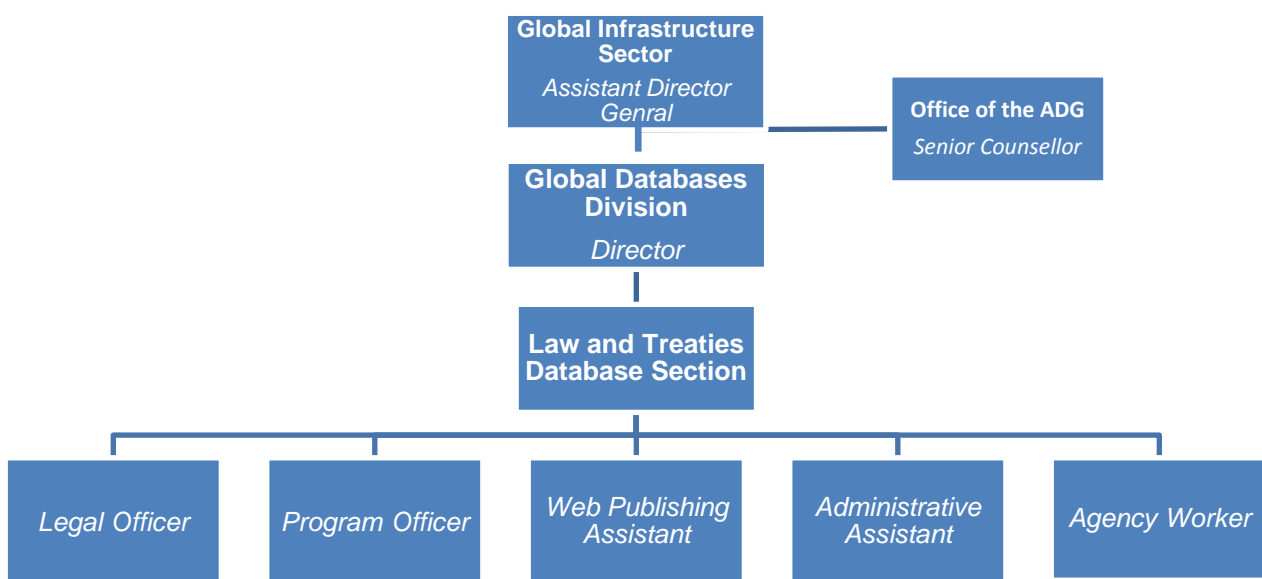
2. OBSERVATIONS AND RECOMMENDATIONS

(A) ORGANIZATIONAL FRAMEWORK OF WIPO LEX

(i) Organization Structure

17. The WIPO Lex team² presently operates within the Laws and Treaties Database Section of the Global Databases Division. Since the transfer from the Office of Legal Counsel, the Director, Global Databases Division, has directly managed the activities of the WIPO Lex team. The former supervisor of the WIPO Lex team is now Senior Counsellor in the Office of Assistant Director General (ADG), and he advises the ADG on the promotion and external relations of WIPO Lex project³. The figure below provides the current organization of the WIPO Lex team within the Global Databases Division.

Figure 1 – Current Organigram of WIPO Lex Team



18. The Global Databases Division also consists of the Patent Database Section, Brand Database Section and New Service Development Section. The management of the WIPO Lex team is an addition to the existing duties of the Director, Global Databases Division.

19. While this arrangement may suffice in the short-term when the transition of the WIPO Lex team to the Global Databases Division is taking effect, it would not be practical in the long term based on the level of management attention required for the WIPO Lex team. The WIPO Lex team requires full-time management attention in the long term, which could be impacted by the existing management commitments of the Director, Global Databases Division.

² One P3 Program Officer, one P3 Legal Officer, one G5 Web publishing assistant, one G6 Administrative Assistant and one Agency Worker. Two interns who were part of WIPO Lex team were discontinued in June and July 2016.

³ Not included in the scope of this audit

20. The existing structure could be augmented through the creation of a position of a head of section for the Laws and Treaties Database Section reporting to the Director, Global Databases Division. Thus the day-to-day management of the activities of the Section would rest with the head which would also allow for a buffer for the Director, Global Databases Section to balance his management attention amongst the different sections of the Division.

(i) Roles and responsibilities

21. IOD understands that a transitional structure has been put in place following the reorganization of the WIPO Lex team. This structure could be subject to further revision.

22. Based on interviews conducted as part of the audit, IOD observed that the current structure requires further clarity as roles and responsibilities with regard to WIPO Lex are not clearly defined. In particular, the current structure does not fully respond to the HR issues which caused the reorganization of the WIPO Lex team and there exists that risk that this could have an impact on the operations of the WIPO Lex team.

23. In order to avoid recurrence of past HR issues which had an impact on the data quality within the WIPO Lex database, IOD draws the attention of management to the need for clearly defining the roles and responsibilities within the WIPO Lex team.

(i) Risk Assessment

24. An important means of actively managing risks or within any business process includes the maintenance of an up-to-date risk register. The risk register would typically contain an assessment of risks within the business process and the mitigating measures that have been put in place to reduce the impact of these risks to an acceptable level.

25. Presently, only risks have been identified relating to WIPO Lex in the WIPO Enterprise Risk Management (ERM) system. Both these risks relate to the effect of competition on the usage of WIPO Lex.

26. Based on the existing business process and known issues, the risk register is incomplete. Risks, particularly those related to the integrity and quality of data in the WIPO Lex database have not been identified. Furthermore, the risks continue to appear under the erstwhile organizational element (i.e. Office of the Legal Counsel).

27. Lack of a comprehensive risk assessment process could impact the ability to recognize all key risks and take necessary mitigating action to reduce the impact of those on the organization.

(i) WIPO Lex Policies and Procedures

28. Policies establish the Organization's intent and philosophy concerning a specific subject matter. They also set the boundaries within which the Organization operates. Procedures help translate the intent into action by laying down the specific steps which need to be performed in order to implement a policy directive. Standard operating procedures help in ensuring the consistency in the performance of routine tasks and reduce person dependency.

29. Presently, in the operations of the WIPO Lex team, certain activities are performed by team members based on an understanding of historical precedent without reference to formal policies. These are particularly evident in the area of providing "notes"⁴ on laws and treaties.

⁴ A Note in the WIPO Lex database is the method through which additional information is provided to users by WIPO which includes, but not restricted to, drawing the attention to IP specific provisions in laws or treaties.

30. While it was the understanding of the existing team members that notes had certain specific utility, there is a lack of clear and documented policies in this regard. This has resulted in inconsistent creation of notes in the laws database by new personnel during various periods of time.

31. There is also a lack of formal documentation of the processes supporting the WIPO Lex operations including those for updating and verification of entries into the database and the related standard operating procedures.

32. The absence of process diagrams and standard operating procedures increase the level of person dependency within business processes and do not allow for proper business continuity in critical situations.

Recommendations

The Global Databases Division should:

1. In collaboration with the Human Resources Management Department, assess the possibility of having in place a full-time head for the Laws and Treaties Database Section (Priority: Medium)
2. Perform a thorough assessment of risks related to WIPO Lex, particularly those related to data quality and update its risk register. (Priority: Medium)
3. Perform a comprehensive review of all areas which require policy guidance and prepare process documentation and standard operating procedures for business processes. (Priority: High)

(B) DATA INTEGRITY AND QUALITY CONTROL

(i) Data Integrity

33. WIPO Lex is an important reference resource for IP related laws and treaties which serves a global user base. Implicit in the popularity of the database and its growing user base, is a reliance on the quality of data that is contained within it.

34. The WIPO Lex database has undergone rapid growth in terms of the number of laws and treaties covered since its inception. During this period of rapid growth, a number of personnel have been involved in the entry of data into the database. These include interns who worked as part of the WIPO Lex team at various points in time over the past four years.

35. Indicatively, an analysis of the active records (around 13,000 as at the time of the writing this report) in the Laws database shows that eighty-eight different users have created entries since the inception.

36. During the course of this audit, IOD was made aware of and based on an examination of sample records, also noted errors and inaccuracies concerning entries in the Laws database. The nature of these errors include:

- (a) Incorrect classification of the type of legal texts as acts or implementing rules;
- (b) Incorrect dates of legal texts;
- (c) Missing/inaccurate relations with other legal texts;
- (d) Poor quality notes and repetition of information contained in legal texts;

- (e) Missing/ Incorrect categorization of the subject matter of legal texts;
- (f) Quality problems in “html” files that contain legal texts; and
- (g) Poor translation of titles and notes concerning legal texts.

37. The main cause of these errors and inaccuracies can be attributed to multiple persons performing data entry operations without proper formal training and lack of proper quality control mechanisms. In particular, the use of unqualified interns for data entry compromised the quality of work. In this context, IOD also noted that there was room for improvement in the business management of WIPO Lex such as supervisory review of data entry and other quality control measures as well as documentation of such workflow and review processes (see paragraph 15 above),

38. In addition, the admin interface used for data entry of information on legal texts does not have basic edit checks built-in which could prevent some of these errors or inaccurate entries. For example, the field for selection of the subject matter (category) of a legal text is permitted to be left blank by the system.

39. Also, for presentation purposes, in some instances some IP laws were hidden from the view of the main country page while trying to make them available as links within the main laws. Hidden links are difficult to check and verify, and consequently, many of them were determined by data entry personnel. To show hidden links, significant amount of manual and intellectual work is necessary, since the system was not designed to support this method of intentional masking but rather for the display of all active legal texts within the main country page. This practice of generating hidden links should be suspended as the objective is to provide all relevant legal texts to the user within the country page, until the system is redesigned to generate automatically interlinks of data.

40. Furthermore, it is not possible to quantify the extent of errors or inaccuracies that exist in the Laws database as these are not due to a systematic fault but rather due to human error in data entry which are ad-hoc and individual specific. Some of these errors and inaccuracies could be identified using query tools (for example, active entries with missing links or files). However, comprehensive detection of other types of errors (such as incorrect files, wrong dates or irrelevant notes) would require a manual review of entries.

41. The data quality issues in the Laws database pose a significant reputational risk to WIPO as the number of users of the WIPO Lex database is quite large. Furthermore, the International Bureau of WIPO would not be fully compliant with its obligations under the Berne and Paris Conventions in publishing information that contains inaccuracies.

42. Due to lack of information on the extent of errors and inaccuracies in the database, only a time-bound systematic review of each entry in the Laws database would be helpful in identifying and correcting the existing errors and inaccuracies. In order that this effort not impede on-going data entry of new laws, it is essential that additional human resources, such as fellow(s) who have qualified expertise, be deployed in this effort to clean-up the database. It is also essential to redesign the current system to augment its functionalities to show data logs and links for better quality control and correction of errors. The organization of this effort should be segregated from the regular data entry of new laws so as to ensure continuity of operations.

(ii) Quality Control

43. In any system that requires manual data entry of information, it is essential that adequate quality control mechanisms exist to verify the completeness and accuracy of data entry. This is more so when the subject matter of data entry is legal texts as there are specific conventions and terminology used which required specialized knowledge and the inaccurate entry of a single word or punctuation mark can change the interpretation.

44. Under the present structure of the WIPO Lex team, there is no full-time staff member at professional level to perform the duties of data entry and its quality control of data in WIPO Lex. An individual who was a previous intern of WIPO Lex and is currently contracted through an external agency performs data entry. The same individual also performed the quality control as an individual contractor under a series of service contracts. In between, there have been periods in which there was no specific person assigned to perform the data entry and quality control function. Institutional knowledge and good practices of data entry to WIPO Lex is currently held by the only one professional who is an Agency Worker, which poses a serious risk of a single point of failure.

45. Any efforts to undertake a systematic clean-up of the data quality in the WIPO Lex database must be accompanied by the establishment of a full-time dedicated quality control function which is adequately manned by a competent WIPO staff member.

46. The absence of an established quality control function along with related documented procedures leaves open the risk of future errors or inaccuracies in data entry not being detected in a timely manner so as to prevent publication of such information.

Recommendations

The Global Databases Division should:

4. Undertake a time-bound project using additional human resources to perform a systemic clean-up of the data entries made in the WIPO Lex database since its launch in 2010 with a view to ensuring the completeness, accuracy and relevance of the information contained therein. (Priority: High)
5. Collaborate with the Human Resources Management Department to identify a solution which would ensure that a full-time quality control function is available for WIPO Lex. (Priority: High)

(C) STRATEGIES

47. In order to ensure the long term sustainability of the WIPO Lex database, management must evolve strategies to deal with issues which require long-term planning. This would help in establishing direction in line with the Organizations strategic objectives.

(i) Translation

48. WIPO Lex is available in the 6 official languages of the Organization. As per the current practice, which needs to be formalized as a policy, only titles and notes pertaining to legal texts are translated into the official languages where they do not already exist in any of those languages.

49. Based on an analysis performed as of May 2016⁵, the status of translation of titles and notes in the Laws database was as given in the table below.

Table 1 – Status of translation of active entries in WIPO Lex (Laws database)

Total Active Entries	Active Entries - English	Active Entries - Arabic	Active Entries – Spanish	Active Entries - French	Active Entries – Russian	Active Entries - Chinese
12,767	12,185	9,912	11,305	10,855	10,142	10,681

50. It is apparent that there exist gaps in the translation of entries in the Laws database between the different official languages.

51. Previously, the database was available only in English, French and Spanish. With the decision to make WIPO Lex available in the other official languages, external contractors were hired to perform the translations into Arabic, Chinese and Russian. However, these were one-off efforts to translate entries then existing into these languages.

52. Although there have been discussions with the Language Division concerning translation arrangements for WIPO Lex, no comprehensive agreement has been reached which would ensure that WIPO Lex requests for translation are serviced.

(ii) Human Resources – Fellowship and interns

53. The WIPO Fellowship Policy (OI No. 61/2014) provides for the awarding of fellowships to qualified individuals as a form of a specialized training activity.

54. In IODs view, the use of “fellows” would be beneficial to augment the human resources capacity of the WIPO Lex team on a short term basis, including those who are needed to perform a time-bound clean-up project as recommended above, while also obtaining qualified individuals to perform work which may require use of legal knowledge in data entry.

55. Previously, as the WIPO Lex team was not subject to the same budgetary restriction on number of internships, significant use of interns was made in its operations. However, the use of interns has been suspended for the time-being.

56. As noted previously, the data quality issues in the WIPO Lex database could be attributed to data entry performed by interns. It would not be appropriate to use interns for data entry purposes as the efforts to train them in ensuring complete and accurate data entry would outweigh any benefits.

57. However, WIPO Lex depends on various sources for updating of new IP related laws and other legal texts. One of these sources is independent research performed by WIPO and its Member States to identify the existence of any IP related laws and legal texts which are not present in the WIPO Lex database. IOD notes that a Circular letter signed by the Director General was sent to all Member States in May 2016, and more than 50 Member States responded to it by nominating their focal points who should help WIPO Secretariat identify any new laws missing in the WIPO Lex and any errors made to the database.

58. In this context, it would be beneficial to utilize the services of interns to help conduct this research.

⁵ Analysis provided by the Laws and Treaties Database Section

Recommendations

The Global Databases Section should:

6. Evolve a strategy for the translation of data in WIPO Lex into the official languages. (Priority: Medium).
7. Work closely with the Human Resources Management Department to enhance the human resources capacity of the WIPO Lex team which may include the use of flexible contractual arrangements. (Priority: Medium).

(iii) Technical structure of WIPO Lex

59. As noted previously, the WIPO Lex database currently operates under a dual technical structure. This structure makes it difficult for further system enhancements to be made in an efficient manner. Any modifications in the system must take into account dependencies from both components of the database and thus increases the effort required in development, testing and deployment. This dual structure is a result of the initial development of the WIPO Lex database which initially started only with the Laws component and the Treaties component was added later with its own technical setup.

60. Technical support for WIPO Lex database was provided by Communications Division with support from an external contractor. As part of the transition of the WIPO Lex team to the Global Databases Division, transfer of technological knowledge of WIPO Lex database is also underway.

61. Once the transfer of technical knowledge of the current WIPO Lex database is completed, the Global Databases Division must conduct a thorough review to determine whether the existing technical structure could meet growing needs and improve the quality of data of the database.

Recommendation

8. The Global Databases Section should review the existing technical structure of WIPO Lex to determine whether it can adequately support future expansion and meet organizational needs. Such a review should include proposals for improving the technical platform of the WIPO Lex database. (Priority: Medium).

TABLE OF RECOMMENDATIONS

No	Recommendations	Priority	Person(s) Responsible	Management Comments and Action Plan	Deadline
1.	The Global Databases Division should, in collaboration with the Human Resources Management Department, assess the possibility of having in place a full-time head for the Laws and Treaties Database Section.	Medium	Mr. Mazenc	I agree with the recommendation. To create a new post of Head requires the allocation of new resources that will be requested for consideration by senior management when the next Program and Budget for 2017-18 is prepared.	October 2017
2.	The Global Databases Division should perform a thorough assessment of risks related to WIPO Lex, particularly those related to data quality and update its risk register.	Medium	Mr. Mazenc	I agree. Review of risk register of WIPO Lex will be made.	December 2016
3.	The Global Databases Division should perform a comprehensive review of all areas which require policy guidance and prepare process documentation and standard operating procedures for business processes.	High	Mr. Mazenc	I agree. The preparation of administrative manual of WIPO Lex will be prepared to clarify and establish policies, instructions and workflow to follow.	December 2016
4.	The Global Databases Division should undertake a time-bound project using additional human resources to perform a systemic clean-up of the data entries made in the WIPO Lex database since its launch in 2010 with a view to ensuring the completeness, accuracy and relevance of the information contained therein.	High	Mr. Mazenc	I agree. To implement the time-bound project, I will explore the possibility of fellows, as recommended in Recommendation 7.	April 2017

No	Recommendations	Priority	Person(s) Responsible	Management Comments and Action Plan	Deadline
5.	The Global Databases Division should collaborate with the Human Resources Management Department to identify a solution which would ensure that a full-time quality control function is available for WIPO Lex.	High	Mr. Mazenc	I agree. After collaborating with HRMD in August, it was decided that one budget post should be created to stabilize and institutionalize the operation of WIPO Lex database maintenance without relying on a single point of failure. The post will be advertised for competition in the last quarter of 2016. Additional resources will be sought in the course of 2017, after the current backlog is processed with priority.	May 2017
6.	The Global Databases Section should evolve a strategy for the translation of data in WIPO Lex into the official languages.	Medium	Mr. Mazenc	I agree. I will prepare draft strategies for the translation of data and will implement it in 2017.	May 2017
7.	Work closely with the Human Resources Management Department to enhance the human resources capacity of the WIPO Lex team which may include the use of flexible contractual arrangements.	Medium	Mr. Mazenc	I agree. See my comments on Recommendation 4.	May 2017
8.	The Global Databases Section should review the existing technical structure of WIPO Lex to determine whether it can adequately support future expansion and meet organizational needs. Such a review should include proposals for improving the technical platform of the WIPO Lex database.	Medium	Mr. Mazenc	I agree. I will start reviewing the technical structure and if necessary make a proposal to restructure the technical platform of WIPO Lex database.	Review will be completed before December 2016.

[Annex I follows]

ANNEX I: PRIORITY OF RECOMMENDATIONS

The recommendations are categorized according to priority, as a further guide to WIPO management in addressing the issues. The following categories are used:

Priority of Audit Recommendations	Nature
<p>Very High</p>	<p>Requires Immediate Management Attention. This is a serious internal control or risk management issue that if not mitigated, may, with a high degree of certainty, lead to:</p> <ul style="list-style-type: none"> • Substantial losses. • Serious violation of corporate strategies, policies, or values. • Serious reputation damage, such as negative publicity in national or international media. • Significant adverse regulatory impact, such as loss of operating licenses or material fines.
<p>High</p>	<p>Requires Urgent Management Attention. This is an internal control or risk management issue that could lead to:</p> <ul style="list-style-type: none"> • Financial losses. • Loss of controls within the organizational entity or process being reviewed. • Reputation damage, such as negative publicity in local or regional media. • Adverse regulatory impact, such as public sanctions or immaterial fines.
<p>Medium</p>	<p>Requires Management Attention. This is an internal control or risk management issue, the solution to which may lead to improvement in the quality and/or efficiency of the organizational entity or process being audited. Risks are limited. Improvements that will enhance the existing control framework and/or represent best practice</p>

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