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| **Bridgewater Housing Association Policy** | |
| **Policy name** | Risk Management Policy and Procedures |
| **Policy category** | Corporate (Governance) |
| **Policy number** | CS25 |
| **Date adopted** | 2019 |
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| **This review** | March 2023 |
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| **Equalities impact assessment required** | No |
| **Links to other documents** | Financial Regulations, Governance Procedures |
| **Consultation** | Not Required |
| **Review Period** | 3 Years |

# BRIDGEWATER HOUSING ASSOCIATION

# RISK MANAGEMENT POLICY AND PROCEDURE

# 1 Introduction

1.1 Bridgewater Housing Association recognises the importance of adopting a corporate approach to risk management. This Policy aims to also satisfy Standard 4 of the Regulatory Standard of Governance – *the governing body bases its decisions on good quality information and advice and identifies and mitigates risk to the organisations purpose.*

1.2 The purpose of this policy is to ensure that we achieve our stated business and strategic planning aims and objectives whilst reviewing the challenges and risks which may be encountered. We recognise that we will face all manners of risk.

1.3 Some risks are so minor as to be insignificant, whereas others have the potential to seriously affect our business’s continued well-being. It is therefore important to understand the likelihood and the potential consequences of our own risks, and to take sensible, cost-effective mitigation measures for the more significant ones.

1.4 Bridgewater recognises that we have a moral and statutory duty of care to our members, customers, employees, and assets. It will meet this duty by ensuring that risk management plays an integral part in the day-to-day management of the business at a strategic and operational level. All employees must understand the nature of the risks and accept responsibility for these associated with their area of control and authority. The necessary support, assistance and commitment of the Board will be provided.

This policy describes Bridgewater’s strategy for managing the risks inherent in its current and future activities and how these risks are controlled and monitored.

# 2 Background

2.1 Bridgewater Housing Association’s Board is aware that the organisation delivers its services within a challenging environment. The Board has acknowledged that current economic conditions have increased the need for support but also decreased the funding and resources available to meet growing expectations. Social housing is facing an ever-increasing range of demands and threats from the drive for increased value for money and efficiency, to the requirements of the Regulatory Framework and the Social Housing Charter, not to mention SHQS compliance, carbon reduction targets, (EESSH/2) and day to day service delivery challenges. It is a hard “ask” of social housing organisations, such as Bridgewater who are increasingly expected to be innovative community leaders and “place makers” as well as excellent providers of services.

2.2 All social housing providers, no matter their size or geographical location, increasingly must critically review the way they work and the services they provide. Crucial to this is effectively managing the key business risks they face, whether these are long-standing issues or new, emerging risks. Bridgewater’s context is unique, and our perception of risk will be significantly different from other organisations in the sector. However, what is the same, is that key people in the organisation understand and effectively manage the fundamental risks of today and in the future.

2.3 Bridgewater’s Board believe that good Risk Management creates an environment of no surprises. It is a crucial element of effective management and corporate governance. It must be an embedded mainstream activity which informs strategic decision making. The Board believes that managing risk effectively means developing a practical plan to identify, deal with and minimise the adverse effects of the expected and the unexpected on the organisation.

2.4 In the context of the activities of Bridgewater Housing Association, Risk Management is about forward planning and acknowledging that it pays to plan for the unexpected. Everyday dramas from a burst pipe to an IT system crash, not only affect our business, but also our tenants, employees, and partners too. Significant issues, such as a contractor going out of business or a major incident, have the potential to not only place the organisation in major jeopardy and disrupt our tenant’s lives but also ruin our relationship with partners and affect their reputation as well as our own.

# 3 SHR Standards of Governance and Financial Management

3.1 Risk is inherent and unavoidable in every activity that any organisation undertakes. The aim of effective risk management is to manage risks and their potential for damage down to an acceptable and manageable level. To enable us to achieve this successfully, we need to understand the risk that we face and how we are currently controlling these risks. We must ensure that everyone in the organisation understands the importance of risk management as part of our day-to-day decision-making processes.

# 4 Approach to Risk

4.1 We recognise that the application of risk management practices will not eliminate all risk exposure. While the application of this policy should create a better understanding of the risks being faced and their implications for the business, there may be occasions where the risk is considered too high to proceed with a preferred course of action – this could include a high level of cumulative risk across all activities at a particular point in time.

4.2 The main aims and objectives of this Policy are to manage our risk effectively to achieve the following benefits:

* A more resilient business
* Informed decision making
* Protection of financial resources and assets (and reputation)
* Improved service quality and reliability
* Increased likelihood of achieving our strategic objectives in our Business Plan

4.3 Our Business Plan outlines what business activity we engage in and as such all-risks link back to the strategic themes of the business. Integrating risk management into the way we deliver services is essential for the achievement of our vision and ambitions.

# 5 Defining Risk

5.1 Every decision we make or action we take contains some element of risk. Risks arise when the vulnerabilities in our systems, processes, facilities, or resources are exploited by or exposed to threats. Examples might include someone hacking into our systems because of IT security vulnerabilities, or a fire breaking out in areas where our detection systems have not been maintained, or errors made by untrained staff.

5.2 Table 1 shows the range of risks facing Bridgewater, and these are just examples.

*Table 1*

|  |  |  |
| --- | --- | --- |
| Theft | Fire | Flood |
| Bad Debts | Computer Failure | Cyber Attack |
| Health & Safety Incident | Power Failure | Contractor Failure |
| Fraud | Negative Cash Flow | Insolvency |
| Litigation | Regulatory Breach | Pollution/Contamination |
| Economic Impact | Human Error | Breach of Contracts/Disputes |

5.3 It is not possible to create a completely risk-free environment, but what we can do is manage risk effectively. We can identify risks, quantify them and once we understand what we are up against we can make informed, considered decisions regarding what, if anything, to do about them.

# 6 Risk Management Process

6.1 There are five stages to our risk management process as detailed below:

* **Stage 1 – Identify Risks**
* Before we can take any meaningful action to address our risks, we need to know what we are up against. So, we need to identify the risks that we face.
* **Stage 2 – Quantify Risks**
* Once we have identified our risks, we need to quantify them. As the risks that we are really interested in are those we consider to be significant enough to do something about, we need to separate these out. We do this by assessing the likelihood of the risk occurring and the impact on the business if it does.
* **Stage 3 – Identify Mitigation Measures**
* Once we know what risks are most serious, we can start to deal with them by identifying mitigation measures – methods of removing, reducing, controlling or recovering from adverse events. Mitigations identified but not in place should be included in the actions until these are implemented.
* **Stage 4 – Implement Mitigation Measures**
* Having determined which mitigation measures we feel are sensible and cost effective and decided which ones we implement; we proceed and manage these and add in any other mitigation measures not currently in place.
* **Section 5 – Review and Monitor**
* To complete the process, we must regularly monitor the effectiveness of the controls we have put in place.

6.2 Identifying Risks

We need to concentrate on the risks to the most important parts of our business and our assets. These could include:

**Strategic Risk**, such as those associated with:

* Business Plan and future direction
* Achievement of Strategic Objectives
* Business Growth
* Organisational and constitutional change and partnerships
* Litigation

**Operational Risk**, such as those associated with:

* Financial/Commercial
* Service Delivery
* Regulatory/Compliance
* Health and Safety
* Technology
* Human Resources
* Individual Projects

Having identified the most critical elements of our business, we can set about assessing the risks to them.

6.3 Quantifying Risks

6.3.1 Our vulnerability to any particular risk is a combination of the likelihood of the risk materialising and the impact if it does. When determining this, we use a simple scale shown below:

|  |  |  |  |
| --- | --- | --- | --- |
| **Score** | **Likelihood** | **Score** | **Impact** |
| 5 | Almost Certain | 5 | Catastrophic |
| 4 | Likely | 4 | Major |
| 3 | Possible | 3 | Moderate |
| 2 | Unlikely | 2 | Minor |
| 1 | Rare | 1 | Insignificant |

When considering likelihood this can be based on statistical information but it is an experienced and sensible assumption.

6.3.2 Following scoring the likelihood and impact scores are multiplied together – for example, if a risk is possible (3) but the impact would be catastrophic (5) – the score would be 15. Understanding the overall risk rating allows us to consider which risks are significant enough to do something about. We will use the matrix below and refer to Appendices 2 & 3 for definitions.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **IMPACT** | **LIKELIHOOD** | | | | | |
|  | Rare  (1) | Unlikely  (2) | Possible  (3) | Likely  (4) | Almost Certain (5) |
| Insignificant (1) | 1 | 2 | 3 | 4 | 5 |
| Minor  (2) | 2 | 4 | 6 | 8 | 10 |
| Moderate (3) | 3 | 6 | 9 | 12 | 15 |
| Major  (4) | 4 | 8 | 12 | 16 | 20 |
| Catastrophic (5) | 5 | 10 | 15 | 20 | 25 |

**Overall Rating**

|  |
| --- |
| **Low** |
| **Medium** |
| **High** |

The risk rating and traffic light colour coding indicates the seriousness and priority for action for any given risks, and this is carried through to the risk registers.

6.3.3 Our risk register details the following:

* Link to Strategic Objective
* Category of risk
* Description and impact of risk
* Risk owner
* Inherent risk score (before mitigation)
* Mitigation and control measures
* Residual likelihood of risk (after mitigation)
* Residual impact of risk (after mitigation)
* Residual risk score (after mitigation)
* Risk Score
* Movement since last review
* Additional Actions Required

6.3.4 We quantify risks both before and after mitigation to determine the effectiveness of the control measures in place. The pre mitigation risk is always scored on the assumption that nothing has been done or put in place as a starting point. This ensures consistency of scoring across the business.

6.4 Mitigating Measures

6.4.1 In general terms, the responses to our risks can be divided into 4 categories. It should be noted that some risks may cross over into more than one box, however the aim is to select and implement measures that reduce the likelihood or impact (or both) to a level that Bridgewater is prepared to accept.

|  |  |  |  |
| --- | --- | --- | --- |
| **LIKELIHOOD** | | | |
| **IMPACT** |  | Low | High |
| High | Insurance/ Contingency Planning | Reduce/Transfer risk |
| Low | Accept | Manage |

Accept – if the likelihood is low and the impact is low it may be a perfectly reasonable decision to do nothing and to accept certain risks. In addition, the fact that many risks cannot be completely eliminated means there is likely to be a level of residual risk remaining, even after implementing our mitigation measures. The aim of our risk management process is to reduce all of our risks to a level that we are willing to accept.

Manage – for risks with a low impact but a higher likelihood a sensible approach might be to manage and control them, for example by process improvement, training or putting in place controls and procedures to monitor the situation.

Insurance/Contingency Planning – if the likelihood is low but the impact is high (such as loss of operational capability, large financial losses or severe damage to the business, contingency plans should be developed and put in place. Our approach to contingency planning has resulted in other policies or plans being in place, for example disaster recovery plans, IT Strategy, Treasury Management Policy, etc. Where appropriate insurance is taken out to ensure there is cover should the risks materialise – public liability insurance, employer liability insurance etc.

Reduce/Transfer – for risks with a high likelihood and a high impact, reducing the risk is paramount. For example, hazardous or dangerous procedures should be removed or modified, monitored or outsourced to someone more qualified or better equipped to carry them out safely. This can also be achieved by taking out insurance for some areas, but consideration must be given to the non-financial aspects of risk.

6.5 Implementing Mitigation Measures

6.5.1 Once the mitigation measures have been identified, it is crucial that the implementation of these are properly managed. This is done through the management of risk registers, which is a document which summarises the risks and opportunities identified, along with likelihood and impact (before and after mitigation), mitigation measures, actions taken and status of these. The scoring of risks is shown as inherent (Gross) risk (with no mitigation put in place) and residual (net) risk (with mitigation measures put in place).

6.5.2 The risk registers are working documents regularly reviewed and updated. Within Bridgewater we have a Strategic Risk Register along with an Operational Risk Register for each function/department. We will also carry out enhanced individual risk registers/assessments for individual projects or complex areas.

6.6 Monitoring and Reviewing

6.6.1 Additional actions will be recorded which might reduce the residual risk further and upon review, movement of this will be identified, including whether the risk has increased since last review. In addition, any new or emerging risks will be identified during this part of the process.

6.6.2 On a quarterly basis the Leadership Team will review and consider the existing and any new risks, and re-score accordingly on both the Strategic and Operational Risk Registers. Where risks have been either escalated or de-escalated this will be noted in the register.

# 7 Risk Awareness Culture

7.1 The most successful organisations are those who embed risk management into their culture – where risks and associated mitigation measures are identified at all levels, where risk registers are maintained by the Leadership Team and overseen by the Board, and where risk management is seen by all employees as just a normal part of the way they do their jobs. To ensure this is the case, various groups of people within Bridgewater have various responsibilities:

7.1.1 Board

* Support and oversee the Risk Management process.
* Agree and set the Risk Management Policy
* Be aware of strategic risks facing the business.
* Consider new and emerging risks and the Association’s appetite in managing these.
* Monitor effectiveness of the Policy and seek assurance on internal controls.
* Monitor strategic risks and delegate operational risks to the Leadership Team for consideration; operational risks may from time to time be presented to the Finance and Corporate Services Sub Committee and the Housing, Land and Property Services Sub-Committee as appropriate.
* Determine the appropriate risk appetite or level of exposure for the RSL, whether it is ‘risk taking’ or ‘risk averse’ as a whole or on any relevant individual issue;
* determining what types of risk are acceptable and which are not; and,

7.1.2 Sub-Committee (Finance and Corporate Services Sub-Committee)

* Have delegated power to monitor and review risk management
* Provide a forum to discuss internal audit and control issues
* Consider the adequacy of risk management and internal control within the Association
* Promote the understanding of risk management

7.1.3 CEO

* Establish , support and facilitate a robust Risk Management process.
* Report on the status of key risks and mitigation measures, including escalation and de-escalation of risks to the Board.
* Manage and review the Strategic Risk Register
* Ensure appropriate levels of awareness and involvement throughout the Association.
* Report on the status of risks and mitigation measures to the Leadership Team.

7.1.4 Departmental Heads/Leadership Team

* Be aware of the risks within their function.
* Apply the Risk Management Policy and Process to identify significant risks and implement or recommend mitigation measures on the Operational Risk Register, and contribute to the Strategic Risk Register as Leadership Team member.
* Manage risks on a day-to-day basis and facilitate staff awareness.
* Report on the status of risks and mitigation measures to the Leadership Team
* Provide leadership and direction to staff.

7.1.5 All Staff

* Understand role, responsibilities and accountabilities with the Risk Management process.
* Identify and rate risks and suggest possible mitigation measures as they arise, either informally or formally via an Operational Risk Register.
* Detail risks as appropriate in Policies or when submitting reports to the Board.

# 8 Risk Appetite

8.1 Risk appetite is an expression of how much risk the Association is prepared to take. Those involved in risk evaluation and prioritisation should, when considering risk, discuss and express the risk appetite as they see it.

8.2 The risk register format steers risk owners into considering risk appetite when updating a risk entry. They need to consider the risk score before and after existing mitigating action but also the final tolerable risk status (i.e. what they are aiming for in terms of status for that particular risk).

8.3 In determining what is the best action to take consideration will be given to the risk appetite of the organisation. This basically means that we will determine whether we will have a low, medium, or high appetite and depending on this appetite what technique we will utilise to either avoid, prevent, retain, cover or transfer the risk.

8.4 The higher the appetite the more risk we will take (retain risk) whereas the lower the appetite the more risks we will avoid (avoid).

8.5 The assessment (likelihood and impact) will consider the risk appetite of the Association. The current risk appetite of the Organisation is detailed below..

8.6 Risk appetite by category

|  |  |
| --- | --- |
| **Risk Category** | **Risk Appetite** |
| Strategy risks | Medium / Cautious |
| Governance risks | Low / Averse |
| Operations risks | High / Eager |
| Legal risks | Low / Averse |
| Property risks | Medium / Cautious |
| Financial risks | Low / Averse |
| Commercial risks | High / Eager |
| People risks | Medium / Cautious |
| Technology risks | High/Eager |
| Information risks | Medium / Cautious |
| Security risks | Low / Averse |
| Project/Programme risks | High / Eager |
| Reputational risks | Medium / Cautious |

8.7 Bridgewater’s risk appetite is summarised in the table below.

|  |  |  |
| --- | --- | --- |
| **Risk Rating** | **Net risk assessment** | **Risk appetite response** |
| **High/Eager** | **20 - 25** | Eager to be innovative and to choose options that suspend previous held assumptions and accept greater uncertainty. Unacceptable level of risk exposure which requires action to be taken urgently. |
| **Medium / Cautious** | **12 - 16** | Preference for safe options that have a low degree of residual risk. Acceptable level of risk but one which requires action and active monitoring to ensure risk exposure is reduced. |
| **Low / Averse** | **1 - 10** | Preference for safe options that have a low degree of inherent risk. Acceptable level of risk based on the operation of normal controls. In some cases it may be acceptable for no mitigating action to be taken e.g. net risk< 4. |

8.8 Only risks assessed as net medium-high will be reported to the Board as these risks require monitoring by the full Board, all other risks will be presented to Sub-Committees as deemed appropriate.

# 9. The Role of Internal and External Audit

9.1 Both internal and external audit provides an independent examination and assessment of controls, assuring the governing body that these are operating effectively. While sharing some characteristics, internal and external audit have different objectives as outlined in the table below:

|  |  |  |
| --- | --- | --- |
|  | **External Audit** | **Internal Audit** |
| Objectives | Add credibility and reliability to financial reports from the organisation to its stakeholders by giving an opinion on the report. | Evaluate and improve the effectiveness of governance, risk management and control processes. This provides members of the board and senior management with assurance that helps them fulfil their duties to the organisation and its stakeholders. |
| Coverage | Financial reports, financial reporting risks. | All categories of risk, their management, including reporting on them. |
| Responsibility for improvement | None, however, there is a duty to report problems. | Improvement is fundamental to the purpose of internal auditing. But it is done by advising, coaching and facilitating to not undermine the responsibility of management. |

# 10 Equalities Commitment

10.1 Bridgewater Housing Association is committed to tackling discrimination on the grounds of sex or marital status, racial grounds, or grounds of disability, age, sexual orientation, language, social origin, or of other personal attributes, including beliefs or opinions, such as religious beliefs or political opinions.

10.2 Bridgewater seeks to embrace diversity, promote equal opportunities for all and eliminate any unlawful discrimination in all areas of our work.

# 11 Policy Availability

11.1 This document can also be provided in large print, braille, audio or other non-written format and in a variety of languages, on request.

# 12 Monitoring and Review

12.1 This policy will be reviewed every three years, unless amendment is prompted by a change in legislation or operational requirements. Consultation with customers is not required for this policy.

# APPENDIX 1 – RISK CATEGORIES

The following categories should be used as prompts to help identify potential areas of vulnerability or uncertainty:

|  |  |
| --- | --- |
| **Risk Category** | **Definition** |
| Strategy risks | Risks arising from identifying and pursuing a strategy, which is poorly defined, is based on flawed or inaccurate data or fails to support the delivery of commitments, plans or objectives due to a changing environment (e.g. political, economic, social, technological, environment and legislative change). |
| Governance risks | Risks arising from unclear plans, priorities, authorities and accountabilities, and/or ineffective or disproportionate oversight of decision-making and/or performance. |
| Operations risks | Risks arising from inadequate, poorly designed or ineffective/inefficient internal processes resulting in fraud, error, impaired customer service (quality and/or quantity of service), non-compliance and/or poor value for money. |
| Legal risks | Risks arising from a defective transaction, a claim being made (including a defence to a claim or a counterclaim) or some other legal event occurring that results in a liability or other loss, or a failure to take appropriate measures to meet legal or regulatory requirements or to protect assets (for example, intellectual property). |
| Property risks | Risks arising from property deficiencies or poorly designed or ineffective/ inefficient safety management resulting in non-compliance and/or harm and suffering to employees, contractors, service users or the public. |
| Financial risks | Risks arising from not managing finances in accordance with requirements and financial constraints resulting in poor returns from investments, failure to manage assets/liabilities or to obtain value for money from the resources deployed, and/or non-compliant financial reporting resulting in potential SHR action |
| Commercial risks | Risks arising from weaknesses in the management of commercial partnerships, supply chains and contractual requirements, resulting in poor performance, inefficiency, poor value for money, fraud, and /or failure to meet business requirements/objectives. |
| People risks | Risks arising from ineffective leadership and engagement, poor culture, inappropriate behaviours, the unavailability of sufficient capacity and capability, industrial action and/or non-compliance with relevant employment legislation/HR policies resulting in negative impact on performance. |
| Technology risks | Risks arising from technology not delivering the expected services due to inadequate or deficient system/process development and performance or inadequate resilience. |
| Information risks | Risks arising from a failure to produce robust, suitable and appropriate data/information and to exploit data/information to its full potential. |
| Security risks | Risks arising from a failure to prevent unauthorised and/or inappropriate access to office space and information, including cyber security and non-compliance with General Data Protection Regulation/FOI requirements. |
| Project/Programme risks | Risks that change programmes and projects are not aligned with strategic priorities and do not successfully and safely deliver requirements and intended benefits to time, cost and quality. |
| Reputational risks | Risks arising from adverse events, including ethical violations, a lack of sustainability, systemic or repeated failures or poor quality or a lack of innovation, leading to damages to reputation and or destruction of trust and relations. |

# APPENDIX 2 – RISK SCORING CRITERIA

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Impact** | **Financial** | **Service Quality** | **Health & safety** | **Reputation** |
| **5.Catastrophic** | Losses exceeding £750k | Complete failure of services | Fatality | Reputational damage is irrecoverable e.g. regulatory intervention |
| **4.Significant** | Losses £150K to £75K | Significant reduction in service quality experienced | Multiple serious injuries occurring | Reputational damage occurs with key stakeholders |
| **3.Moderate** | Losses £50K to £150K | Service quality impaired – changes in service delivery required to maintain quality | Serious injury | Reputational damage is uncomfortable for Bridgewater Housing Association – adverse press publicity |
| **2.Minor** | Losses £10K to £50K | Marginally impaired – slight adjustment to service delivery required | Minor injury | Slight reputational damage arising |
| **1.Slight** | Negligible cost – up to £10K | Negligible effect on service quality | No injury | No effects on reputation |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Likelihood of occurrence** | | | | |
| **1.Rare** | **2.Unlikely** | **3.Possible** | **4.Likely** | **5.Almost certain** |
| 0 – 20% | 21 – 40% | 41 – 65% | 66 – 90% | 91 – 100% |

# APPENDIX 3 – RISK SCORING MATRIX

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Risk Scoring Matrix** | | | **LIKELIHOOD** | | | | |
| **1** | **2** | **3** | **4** | **5** |
| Rare | Unlikely | Possible | Likely | Almost Certain |
| **IMPACT** | **1** | Insignificant | **1** | **2** | **3** | **4** | **5** |
| **2** | Minor | **2** | **4** | **6** | **8** | **10** |
| **3** | Moderate | **3** | **6** | **9** | **12** | **15** |
| **4** | Major | **4** | **8** | **12** | **16** | **20** |
|  | **5** | Catastrophic | **5** | **10** | **15** | **20** | **25** |

**APPENDIX 4 – RISK REGISTER FORMAT**

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
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|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | **RISK MANAGEMENT REGISTER** | |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  | **INHERENT RISK** | | |  |  | **RESIDUAL RISK** | | |  |  |  |  |
| **RISK NO.** | **CATEGORY** | **STRATEGIC / OPERATIONAL RISK** | **KEY LINKS TO STRATEGIC OBJECTIVES** | **RISK IDENTIFIED** | **RISK OWNER** | **IMPACT** | **LIKELIHOOD** | **COMBINED** | **EXISTING MITIGATING ACTIONS** | **FUTURE ACTIONS** | **IMPACT2** | **LIKELIHOOD3** | **COMBINED4** | **TIMESCALE** | **DATE OF LAST UPDATE** | **COMMENTS** | **MOVEMENT SINCE LAST REPORT** |
| 14 |  |  |  |  |  |  |  | 0 |  |  |  |  | 0 |  |  |  |  |
| 15 |  |  |  |  |  |  |  | 0 |  |  |  |  | 0 |  |  |  |  |
| 16 |  |  |  |  |  |  |  | 0 |  |  |  |  | 0 |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |