

WILTSHIRE & SWINDON POLICE & CRIME COMMISSIONER (OPCC) RISK REGISTER 2015-16

Last reviewed : 18 August 2015
Risk Appetite is : 30

ID	Date identified	Event	Consequence	Main impact area(s)	Initial Risk Score April 15				Mitigation and controls	Residual Risk Score				Date reviewed
					L	C	I	Score		L	C	I	Score	
PUBLIC CONFIDENCE & INTEGRITY														
1	18/08/15	Failure of PCC or CC to engage with communities and stakeholders to inform priorities and service changes	Reduced public satisfaction and confidence in OPCC Community voice not heard Public are unaware of how the PCC and Force are performing	Reputation Operational delivery	1	1	4	4	OPCC attendance at Area / community boards twice yearly PCC engagement at local markets events, community events and services Active social media presence Regular communications to inform public Formal consultation on police and crime plan Regular meetings with local authority leaders and senior teams	1	1	4	4	18/08/15
2	18/08/15	Transformation or service changes are not communicated to public / stakeholders and feedback is not considered	Reduced public satisfaction and confidence in OPCC Community voice not heard Increased resistance to changes Changes undermined Benefits expected are reduced	Reputation Operational delivery	2	3	3	18	Police and Crime plan public and partner consultation Police engage with area / community boards, local communities as service changes are developed Changes built on robust evidence and planning to plan engagement and reflective periods Engage with staff associations and partners	1	3	3	9	18/08/15
3	18/08/15	OPCC failure to fulfil statutory duty and publish all required information and respond to FOI requests.	Public are unaware of how the PCC and Force are performing Public cannot assess the performance of the PCC effectively. Public expectations are not satisfied and possible loss of confidence	Reputation Performance	1	2	3	6	Publication of all relevant information on OPCC website - confirmed by Grant Thornton Police Transparency New updated PCC website launched and audited to ensure all required information is published All financial, decision and governance documents accessible on website FOI procedures in place with FOI officer in place Monthly FOI review by Commissioner Police and Crime Panel protocol in place and used during P&C plan / annual report development	1	2	3	6	18/08/15
4	18/08/15	Failure to have oversight of complaints against officers or staff (OPCC and Force), including IPCC referrals.	Failure to deliver statutory duty on behalf of the public Loss of public confidence in PCC which is likely to extend to Wiltshire Police Criticism from government / HMIC and adverse media attention IPCC intervention	Reputation Performance	2	2	4	16	Independent Adjudicator in place to review all appeals of police complaints to provide independence OPCC complaints officer fulfils PCC role and also has ongoing monthly monitoring in place of force complaints Professional standards performance part of PCC management of Wiltshire Police Quarterly reporting of complaints included within to PCP Annual report published summarising key themes, issues and areas for improvement - reported to PCP Complaints dip sampling takes place to review how cases handled	2	2	4	16	18/08/15
5	18/08/15	Loss of integrity of PCC, OPCC staff, and Chief Constable due to inappropriate behaviour	Damage to the reputation of PCC, OPCC and force Loss of public confidence in PC Criticism from government / HMIC Adverse media attention	Reputation Performance	2	2	4	16	Enhanced Professional Standards regime Police have standards and Behaviours framework in place PCC Register of Interests and Gifts and Hospitality (published on website) HMIC reports provides inspections covering aspects of legitimacy, standards and behaviours Whistle blowing policy and reporting mechanism in place Ethics and Standards Board established (PCC and CC attend) Robust vetting and employment checking is used as per HR policy	2	2	4	16	18/08/15
6	18/08/15	Effective whistle blowing systems are not in place to make staff aware and confidence in reporting incidents and behaviours	Incidents and behaviours go unreported PCC does not fulfil statutory duty to maintain an effective and efficient police force	Financial Reputation Performance	2	3	3	18	Whistle blowing Policy published on OPCC website HMIC report on Integrity – 'good' grading	2	2	3	12	18/08/15
7	18/08/15	Wiltshire Police fail to have internal HR organisational policies and services that meet the duties and aims under the Equality Act 2010.	Do not fulfil legal duty and values of organisation Failure to attract the best talent for the organisations Failure to maximise the skills of workforce Increased risk of HR tribunals and litigation Damage relationship and reputation as an employer	Reputation Operational delivery Performance	3	3	3	27	HR Policies sets out obligations and procedures to meets its duties Recruitment, redeployment and support policies in place Equality and Diversity Charter to be launched Recent ET raised areas for force to improve and increase staff training, PCC receiving regular Awaiting Diversity Development Plan due November from Police to address shortfalls	4	3	3	36	18/08/15
8	18/08/15	Wiltshire Police fail to have operational policies and services that meet the duties and aims under the Equality Act 2010	Do not fulfil legal duty and values of organisation Wiltshire Police does not reflect the diversity of the community it serves Failure to identify and respond to demands of diverse communities Damage to public confidence in policing - disproportionate effect in communities Reputational damage to PCC, OPCC and Police	Reputation Operational delivery Performance	2	3	3	18	Wiltshire Police have policies related to Stop and Search Assessment of victims vulnerability, including aspects of diversity Specialist support services in place for ensuring support for a range of diverse groups Work within the P&C Plan looks to increase awareness and training for officers in understanding different needs of communities	2	2	3	12	18/08/15
9	18/08/15	PCC and OPCC fail to commission services that meet the duties and aims under the Equality Act 2010	Do not fulfil legal duty and values of organisation Failure to attract most effective solutions and suppliers Failure to consider equality in Police and Crime Plan	Reputation Operational delivery Performance	2	2	3	12	OPCC works within procurement and rules Funding agreements ensures responsibilities are met by third parties Extensive relationship with community and vuneraltly sector providers PCC signatory to Wiltshire Compact Innovation fund encouraged community and bids in areas that are hidden P&C Plan identifies areas of underinvestment based on JSA and strategic assessment Commissioning Strategy being developed	2	2	2	8	18/08/15
EFFECTIVE GOVERNANCE AND SCRUTINY														

Scoring Colour
1-7 - green
8-17 - yellow
18-29 - orange
30+ - red

ID	Date identified	Event	Consequence	Main impact area(s)	L	C	I	Score	Mitigation and controls	L	C	I	Score	Date reviewed
10	18/08/15	PCC fails to hold the Chief Constable to account for the delivery of the Police and Crime Plan	Failure to fulfil PCC function Local community voice not heard Weak governance and accountability of CC Police and Crime Plan elements are not delivered Failure to improve services Critical feedback from PCP Reduced public confidence in PCC Reduced confidence in OPCC	Reputation Operational delivery Performance Legal	2	1	3	6	New P&C Plan - all CMB, Delivery Plan and Police performance structures have been reviewed Bi-Weekly CMB is where PCC holds CC and CEO to account for delivery Monthly SCT built around delivery of P&C Plan - OPCC attend Police performance framework built around delivery of P&C Plan Clear P&C organisational owners Contractual reporting of key performance indicators by commissioned services (quarterly)	2	1	2	4	18/08/15
11	18/08/15	Failure to hold the Chief Constable to account for the delivery of an effective and efficient police service	Failure to fulfil PCC function Local community voice not heard PCC unclear of performance Weak governance and accountability of CC Failure to improve services Service efficiency, effectiveness and legitimacy failures Resources are wasted Critical feedback from PCP Reduced public confidence in PCC and OPCC Adverse media attention	Reputation Performance Legal	2	2	4	16	Bi-Weekly Commissioning Monitoring Board where PCC holds CC and CEO to account for delivery Monthly SCT built around delivery of P&C Plan - OPCC attend PCC receives Fortnightly briefings from performance team Informal updates from CC and Chief Officers as and when OPCC CEO is part of Gold groups for all significant issues Performance culture review continues with roll out of Click view and force strategic performance framework Revised Scheme of Governance for twin corporations sole in place OPCC involved in all HMIC briefing and debriefs to understand inspections and immediate feedback	1	2	4	8	18/08/15
12	18/08/15	Failure to be involved in inspection programme, provide statutory response and hold CC to implement recommendations	Failure of PCC duty to secure efficient and effective police force Public confidence in PCC is adversely affected Loss in reputation of PCC Adverse media attention, criticism from external auditors, government	Reputation Operational delivery Performance Legal	2	1	4	8	Managed by Continuous Improvement Team CMB timetables HMIC inspections, participates in briefings and debriefs Reports considered at CMB and SCT HMIC Publication on website and Commissioner's response CC held to account by PCC at CMB to deliver HMIC improvement plans	2	1	4	8	18/08/15
13	18/08/15	Strategic Alliance has weak governance and accountability	Reduced influence of PCC over police Reduced effectiveness of local accountability Service quality disproportionately affecting Wiltshire Satisfaction with policing declines Adverse media criticism	Performance Financial Reputation Operational delivery	3	3	3	27	Alliance Board and programme board has PCC and CC representation from Wiltshire and Avon and Somerset Programme Director appointed and began role 01/06/15 Programme Director reports to both Wiltshire and ASC SRO Alliance discussed at every CMB Heads of terms signed and publicised Devon and Cornwall and Dorset collaboration will be used to benchmark and align with where appropriate	2	2	3	12	18/08/15
14	18/08/15	Collaboration arrangements do not deliver anticipated benefits with weak governance and accountability	Reduced influence of PCC over police Reduced effectiveness of local accountability Weak governance Service quality falls Satisfaction with policing declines Adverse media criticism	Financial Operational delivery Performance	2	2	4	16	PCCs in South West region meet on a regular basis to maximise collaboration opportunities Governance meeting structure and agenda in place Collaboration protocol agreed by all regional PCCs and Forces Regional Programme Board in place and team agreed Significant collaboration and work with partners ongoing and managed through regional governance arrangements New P&C Plan places partnerships and collaboration as way to deliver. Existing partnerships to be maximised Partnership impact and alignment to P&C plan and how this will be delivered is being prepared	2	2	4	16	18/08/15
15	18/08/15	Local Authority strategic partnership do not deliver anticipated benefits with weak governance and accountability	Reduced influence of PCC / CC over service levers Reduced control over operational levers Failure to secure value for money and efficiencies Failure of critical services - IT, estates Missed opportunities to improve services and outcomes Reduced public confidence Adverse media criticism if service quality falls Satisfaction with policing declines	Reputation Performance Legal	2	4	4	32	Wiltshire Council collaboration will be managed through the Joint Transformation Board (PCC, C Exec, Leader of Council, CC, DCC) Agreed position reached with Chief Constable and Wiltshire Council and Swindon Borough Council) and reviewed at CMB internally Lease agreements in place for some shared estates Monthly meetings between PCC and Leaders of the two Councils Continuing alignment of campus programme and shared estates with both authorities Wiltshire Council provide strategic relationship for IT and extensive work has been on ongoing to deliver improvements to IT services	2	3	3	18	18/08/15
16	18/08/15	Failure to have effective oversight of force risk	PCC is unaware of key risks affecting operational effectiveness Chief Constable is unsupported by the PCC in mitigating risks Increased risk of harm to the public Impact on effective delivery of the Policing & Crime Plan	Reputation Performance Operational delivery	3	1	3	9	Wiltshire Police have strategic risk register which is available to OPCC Reviewed every month at SCT - OPCC in attendance Force risk register scrutinised by Audit Committee Risks discussed at CMB with Chief Constable and senior officers	2	1	3	6	18/08/15
17	18/08/15	Regional and Tri-force services do not have an effective governance and scrutiny route to PCCs who are responsibility for oversight	Failure to fulfil PCC function PCC not aware of developments and risks Weak governance and accountability of lead officer / CC Failure to secure expected services Reduced public confidence in PCC Reduced confidence in OPCC	Reputation Operational delivery Performance Legal	3	3	3	27	PCCs in South West region meet on a regular basis to maximise collaboration opportunities Governance meeting structure and agenda in place Collaboration protocol agreed by all regional PCCs and Forces Regional Programme Board in place and team agreed Significant collaboration and work with partners ongoing and managed through regional governance arrangements Regional Board awaiting new structure of performance and financial information on tri-force collaborations	3	2	3	18	18/08/15
18	18/08/15	Failure of CC and PCC staff to keep PCC informed of developments or make decisions outside of scheme of delegation	PCC makes decisions without information and assessment of implications PCC prevented from fulfilling statutory duty Officers in breach of scheme of delegation Public voice not heard at during decision making Lower transparency increased negative cultural behaviours	Reputation Operational delivery Performance Legal	2	3	4	24	Scheme of delegation in place OPCC attendance at SCT - Transformation and Delivery PCC receives SCT agenda and minutes Commissioner decision notice requires PCC, CEO, Legal and Finance signature Police performance framework is built around P&C Plan New spends / allocations part of SCT governance at which OPCC is part Internal Audit / external audit reports presented to Audit committee and PCC HMIC efficiency inspections	2	3	3	18	18/08/15

Scoring Colour
1-7 - green
8-17 - yellow
18-29 - orange
30+ - red

ID	Date identified	Event	Consequence	Main impact area(s)	L	C	I	Score	Mitigation and controls	L	C	I	Score	Date reviewed
STRATEGY, SERVICE QUALITY & TRANSFORMATION														
19	18/08/15	Failure to plan and foresee political, economic, social, technological environmental, legislative or organisational changes	Unprepared for changes compromises effectiveness of the OPCC Lack of planning and missing opportunities Policing & Crime Plan and decisions not reflective of wider changes Unaware of changes to responsibilities and functions Failure to recognise changes to policing Loss in reputation of PCC Adverse media coverage criticism from external auditors, government / HMIC	Reputation Performance	2	2	3	12	OPCC actively scans a range of sources: APCC newsletter and forward plan Google Alerts HO and MOJ circulars College of Policing Local and national press, journals and articles Regular liaison with council officers, members and partners Regional commissioners Board and Programme Board Home Office seminars, conferences Weekly comms meetings to plan and prepare for announcements Team meetings	1	2	3	6	18/08/15
20	18/08/15	Horizon victim and Witness care does not provide a quality service for victims	Victims are not supported to cope and recover Service is inefficient and does not provide value for money Witnesses are not supported through process No of cracked and ineffective cases increases due to witness / victim not attending Poor feedback from victims and witnesses	Operational delivery Performance	2	3	3	18	Horizon witness service in place - since April 2015 Review meeting scheduled in Autumn Project team now management team with OPCC representative PCC receives updates from OPCC officers on assessment of performance Horizon reviewed via SCT and CMB	1	3	3	9	18/08/15
21	18/08/15	IT transformation does not deliver benefits on time	Productivity benefits not realised - New ways of working Missed opportunities of improved technology Affects other P&C Plan deliverables Older equipment limits capability Reduced public confidence Criticism by HMIC	Reputation Operational delivery Performance	3	3	3	27	NWOW strategy in place Numerous enabling projects in this area provide linked risk and knock on consequence Strategic Partnership with Wiltshire Council improved capability and delivery Equipment rollout ongoing - Laptops near completion Community Policing pilot priority to embed changing tech with new culture before rollout across force Regular meetings across all aspects of IT between police and Wiltshire Council Project and Programme support provided to all IT projects	3	2	3	18	18/08/15
22	18/08/15	Proposals for new custody suite is not delivered successfully	Reduction of operational effectiveness Impact of overall estates strategy Increases in costs Adverse media coverage Loss of reputation of PCC and Wiltshire police	Reputation Operational delivery Performance	2	3	3	18	Feasibility study underway Decision based on wealth of evidence and analysis - provide accurate assessment of need Public engagement and communications strategy ongoing Aligned to estates review and strategy Aligned to NWOW strategy and partnership strategies	2	3	3	18	18/08/15
23	18/08/15	Community Policing pilot is not effective at improving visibility, public satisfaction and efficiencies	Anticipated benefits are not delivered Operating model is not sustainable Service quality decreases satisfaction for victims and public falls visibility falls Risks to other elements of P&C plan increase	Reputation Operational delivery Performance	3	3	4	36	Pilot based on two years planning and systems thinking review Evidence based approach to build model from bottom up Project team meeting monthly - includes OPCC Contained pilot area to assess changes and improve failsafe safe plan in place if significant challenges emerge Workforce fully engaged and volunteered to become part of project Local communities fully informed and engaged in process	2	3	4	24	18/08/15
24	18/08/15	Failure to maintain effective partnerships with criminal justice agencies	Justice processes become inefficient and not joined up Justice outcomes and victim satisfaction and care declines Lack of confidence in criminal justice process by victims of crime Loss of public confidence in PCC which is likely to extend to Wiltshire Police and Justice partners	Reputation Operational delivery Performance	3	2	3	18	CJS Efficiency Programme will integrate justice services Horizons (Victim and Witness support unit) opens 1st April 2015 Chair Community Safety and Crime Reduction Strategic Board Liaison with Judiciary Wiltshire Criminal Justice Board member New P&C Plan has embedded improvements for criminal justice and influence role of PCC Joining of performance subgroups with Crime reduction Board to begin alignment Recruitment of restorative justice staff to coordinate and improve the quality of RJ across partnership	3	2	3	18	18/08/15
25	18/08/15	OPCC commissioning arrangements are not in place or are ineffective	Resources do not meet Police and Crime Plan Failure to develop effective solutions that meet need Failure to maximise performance Failure to secure value for money Stifle innovation and creative solutions Fail to comply with legal requirements on procurement	Reputational Operational delivery Performance Legal	3	3	3	27	Contracts in place for each commissioned service provider Funding agreements in place for all grants and contracts Quarterly reporting from commissioned agencies is contractual requirement Horizon launch and victim service contract developed Quarterly performance regime established for victim service. Horizon service managed as project until BAU and will be integrated into performance management Community Foundation Innovation funding report demonstrated effectiveness Commissioning Strategy and process review due Autumn 2015 Commissioning Data Manager being recruited as secondment	2	3	3	18	18/08/15
26	18/08/15	Partners make decisions that impact PCC and Police without discussion or involvement in decision making process	Missed opportunities unexpected detrimental impact of policing Increased demand on policing services Loss of confidence in relationships with partners	Reputation Operational delivery Performance	2	3	3	18	PCC Membership of One Swindon, Wiltshire Public Service Board, Health and Wellbeing Boards PCC attends numerous partnership boards Bi-monthly meeting with Council Leaders OPCC meets council team at regular internals CMB discuss emerging developments with partners	2	2	3	12	18/08/15
27	18/08/15	Failure of PCC to ensure Wiltshire Police meets its strategic policing requirement	Failure to deliver statutory duty Operational effectiveness in the Protective Services arena is compromised Increased risk in areas such as Organised Crime Loss of public confidence in PCC which is likely to extend to Wiltshire Police Severe criticism from government / HMIC	Operational delivery Performance	2	2	3	12	SPR now features explicitly within the new P&C Plan and adds Child Sexual Abuse as new requirement CMB holds CC to account to ensure these requirements are met Tri Force collaboration in place (Special Branch, Terrorism, Specialist Ops) Increased investment in services to protect vulnerable children at risk of sexual abuse and CSE HMIC PEEL Inspection considers compliance to Strategic Policing Requirement – recent report graded 'good'	1	2	3	6	18/08/15

Scoring Colour
1-7 - green
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28	18/08/15	Strategic Alliance negatively impacts outweigh business benefits	Key delivery areas are compromised or do not address the requirements of the Wiltshire PCC, Wiltshire Constabulary or the Wiltshire public. Falls in service quality Reduction in HMIC ratings PCC do not wish to commission policing model provided	Reputational Operational delivery Performance Legal	3	3	4	36	Regular meetings of Alliance Board working with Avon and Somerset to progress Development of governance structure through which each programme will be monitored Heads of terms signed and publicised Programme Director appointed and began role 01/06/15 Devon and Cornwall and Dorset collaboration will be used to benchmark and align with where appropriate PID developed for strategic alliance. Business cases will be developed for range of services and all options will need to be agreed by all parties	3	3	4	36	18/08/15
RESOURCES														
29	18/08/15	Failure to set a balanced budget with precept level agreed within budget cycle	Outcomes of Policing & Crime Plan are compromised Policing and community safety opportunities are not maximised Miss council tax setting timetable Reduction in service due to poor financial planning Loss of public confidence in PCC which could extend to Wiltshire Police and its Partner agencies	Financial Reputation Operational delivery Performance	2	2	2	8	Established budget build process Monthly review of accounts at CMB Section 151 Officer in post Reserves in place to provide adequate contingency Consultation process for precept (with public, businesses, Chief Constable, partners, PCP)	1	2	2	4	18/08/15
30	18/08/15	Failure to have adequate capital and reserves to meet expenditure	OPCC failure in statutory obligations. Policing and community safety opportunities are not maximised, potentially leading to unnecessary increases in crime and ASB . Not able to provide enough funds to Chief Constable to provide an effective and efficient police service Loss of public confidence in PCC which could extend to Wiltshire Police and its Partner agencies. Unable to sustain further projects and meet unexpected expenditures.	Financial Reputation Operational delivery Performance	2	2	2	8	Managed by OPCC Chief Finance Officer Redevelopment of Wiltshire Police estate with Wiltshire Council and Swindon Borough Council, to maximise use of assets MTFS considered and agreed at CMB with savings required agreed, CSR in NOV likely to affect these assumptions PCC will request scenario planning in MTFS development Strategic Alliance provides opportunities for savings - reserves in place to support transformation - if required ICT investment to allow agile working improving police visibility and productivity	3	3	3	27	18/08/15
31	18/08/15	Failure to ensure effective control and financial planning	Uncontrolled spending Failure to comply with statutory requirements Impact on delivery of Police and Crime Plan Increased exposure to fraud Loss of public confidence in PCC which could extend to Wiltshire Constabulary and its partner agencies, government intervention	Financial Reputation Operational delivery Performance	2	2	4	16	Monitoring of accounts at CMB Managed by Chief Finance Officer Redevelopment of Wiltshire Constabulary estate with Wiltshire Council to maximise use of assets Scheme of delegation and budget book Medium Term Financial Strategy Contingency and reserves with no debt Fortnightly meetings with Chief Finance Officer PCC review of expenditure over £500 Internal Audit Review by Audit Committee	1	2	3	6	18/08/15
32	18/08/15	Inadequate records of and management of assets	Failure in statutory duty on PCC. Poor financial understanding and poor control Value for money is not achieved Loss of confidence in PCC and Wiltshire Police to effectively manage resources Negative impact on reputation	Financial Reputation Operational delivery	2	3	3	18	Senior Command Team now focussed on this area – new ways of managing ICT plan agreed at CMB Audit focus exists Management of non-ICT assets improvement with new monitoring process ICT assets remain high risk – list of proposed assets to be disposed Limited assurance report received from Internal Auditors (previously no assurance) Process agreed with Information Commissioner	2	3	3	18	18/08/15
33	18/08/15	Failure to ensure value for money (ensuring resources are aligned to priorities, risks and threats) of all expenditure by the OPCC and Force	Breach of statutory duty Ineffective use of public money Inefficient levels of performance Missed opportunities with misaligned resources Loss of public confidence in PCC and Police Adverse criticism from Govt, PCP and media Risk of legal challenge	Financial Reputation	2	3	3	18	Budgets monitored through Commissioner's Monitoring Management Board Detailed performance and project delivery is considered at SCT - OPCC in attendance Police framework moving towards benefits realisation Internal Audit programme Police & Crime Plan takes account of Wiltshire & Swindon Strategic Assessment, JSNA etc P&C plan sets clear priorities and objectives PCC received policing advices from CC at CMB on policing and allocation of resources Commissioning Data Manager being recruited as secondment HMIC Value for Money profiles reviewed and assessed HMIC PEEL Inspection received and graded 'good'	2	3	3	18	18/08/15
34	18/08/15	Failure to have an effective internal audit programme	Areas such as assets, budgets, procedures are not robustly managed increased risk of liability or inefficiency Criticism from external auditors, government / HMIC Adverse media attention Loss of public confidence	Financial Reputation Performance	1	1	3	3	Joint OPCC and PCC audit committee in place Audit programme is established as 'business as usual' New members on panel with governance experience	1	1	3	3	18/08/15
35	18/08/15	Insufficient staffing to discharge PCC functions , to be effective in holding the Chief Constable to account and provide resilience	Failure to fulfil statutory duties to a satisfactory level Failure to support the PCC Insufficient advice, guidance Inefficient governance and decision making Insufficient scrutiny holding CC to account Increased risk across all areas of OPCC risk register Poor quality OPCC failing to provide an effective voice for the public Poor staff morale, high sickness and high staff turnover Criticism from government, HMIC, PCP Adverse media attention Loss of public confidence	Reputation Performance	2	2	4	16	OPCC implementation plan developed to identify deliverables, potential gaps and resilience Commissioning Data Manager being recruited as secondment Weekly team meetings and buddied functions within OPCC to cover during absence Shared section 151 officer PCC shares resources from finance and comms to provide resilience OPCC implementation plan maps resources to workplan	1	2	4	8	18/08/15

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		<p>GREEN = risk has decreased since last update</p> <p>RED = risk has increased since last update</p>												

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1-7 - green
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