

Executive Summary: May 2019

CHANGES SINCE LAST REPORT IN FEB 19				CURRENT RISK STATUS HIGHLIGHTS		
New Risks or Risks Increased in Level	Risks Reduced in Level	Risk Reduction Target Date Changes	Other Changes	Risk Treatment Progress Issues	Risks Currently Accepted	Risks with Severe Inherent Consequence
3. Asset Investment Decisions (Moderate to Extreme. Assurances now sought across all asset management activities post the property review outcome)	Nil	1. Global Warming: Sea Level Rise / Climate Change (target date to reduce risk to 'High' set to June 2023) 5. Central Government Policy Uncertainty (target date to reduce risk to 'Moderate' set to Dec 2019) 12. Financial Management (target date extended +12 months) 13. New Asset Operational Deficiencies (target date extended + 12 months)	4. Iwi Relationships (Revised wording) 5. Central Government Policy Uncertainty (Revised wording) 8. Business Disruptions (Revised wording) 10. "Programme Delivery" was previously titled "Programme Budgets" 12. Financial Management (Revised wording) 16. "Open for Business" (Revised wording) 17. "High Debt" was previously titled "Borrowing Levels"	3. Asset Investment Decisions (uncertainties in asset management) 4. Iwi Relationships (ongoing significant challenges, no risk treatment target date set) 9. Paraparaumu Wastewater Treatment Plant Consent (Dependency on 'Iwi Relationship' risk) 13. New Asset Operational Deficiencies (slower progress than anticipated, target date extended)	14. Significant Contractual Disputes 15. Community Engagement 20. Economic Development and District Growth 21. Procurement Process Compliance 22. Environmental Compliance	1. Global Warming: Sea Level Rise / Climate Change 2. Infrastructure Service Disruption 4. Iwi Relationships 9. Paraparaumu Wastewater Treatment Plant Consent 11. Health and Safety 18. Emergency Response 19 Drinking Water Safety

RISK RANKING TABLES

Risks have been ranked using the mechanism below. This assessment tool is subjective and should only be used to a risk comparison and ranking mechanism. It should not be regarded or used as an absolute measure of risk. Risk must be considered as the effect of uncertainties on the achievement of objectives.

Risk Consequence

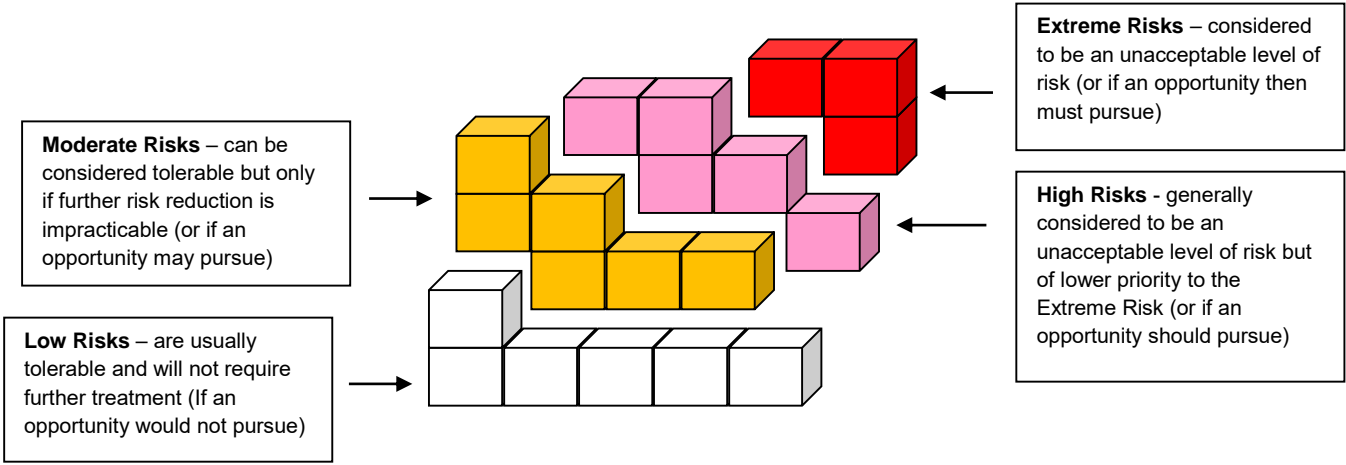
	Rating	H&S	Financial	Fraud	Operational	Reputational
Severe	100	Loss of life	Direct loss or increased cost of over \$1M	\$20k+	Serious loss of critical operational capability for over 4 weeks and serious disruptions to service levels.	Major loss in community confidence. Negative multi-media nation-wide coverage for 2+ weeks. Negative international coverage Significant national political criticism
Major	70	Injury with 3+ months' time off	Direct loss or increased cost of \$100k - \$1M	\$5k - \$20k	Serious loss of critical operational capability for over 2 weeks and major disruption to service levels.	Some loss in community confidence that will take significant time to remedy. Negative multi-media nation-wide coverage for up to 2 weeks Some national political criticism
Moderate	40	Injury with 2 weeks to 3 months' time off	Direct loss or increased cost of \$10k - \$100k	\$1k - \$5k	Serious loss of critical operational capability for up to 2 weeks and disruption to service levels.	Manageable loss in community confidence. Negative multi-media nation-wide coverage for several days. Local adverse media coverage for a week
Minor	10	Injury with less than 2 weeks' time off	Direct loss or increased cost of \$2k - \$10k	\$1k - \$5k	Loss of critical operational capability in some areas and limited disruption to service levels.	Loss of confidence amongst sections of the community. Negative multi-media nation-wide coverage for up to 1 day. Local adverse media coverage for several days

Risk Likelihood

	Rating	Frequency	Probability
Rare	1	The event is only expected to occur in exceptional circumstances, perhaps once every 10 years	< 1%
Unlikely	2	Could occur only very occasionally, perhaps 2-3 times every 10 years	1% - 9%
Possible	3	Might occur from time to time, perhaps, 5 out of every 10 years	10% - 19%
Likely	4	Will probably occur often, perhaps 7 times in every 10 years	20% - 50%
Almost Certain	5	Expected to occur almost every year, perhaps 9 out of 10 years	>50%

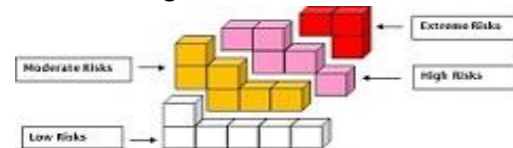
Risk Assessment Matrix

		Likelihood					
		Rare	Unlikely	Possible	Likely	Almost Certain	
		1	2	3	4	5	
Consequences	Severe	100	Moderate 100	High 200	High 300	Extreme 400	Extreme 500
	Major	70	Moderate 70	Moderate 140	High 210	High 280	Extreme 350
	Moderate	40	Low 40	Moderate 80	Moderate 120	Moderate 160	High 200
	Minor	10	Low 10	Low 20	Low 30	Low 40	Low 50



Risk Statement	Short Description	Cause	Impacts	Consequence (C)	Likelihood (L)	Current C*L	Current Risk Level	Target Risk Level	Controls	Treatments	Owner	Target Date Original	Target Date Revised	Previous Treatment Status	Latest Treatment Status	Risk Treatment Update
1	Global Warming: Sea Level Rise / Climate Change Erosion, property floods, property abandonment, early asset replacements and higher costs for more resilient assets are likely to result due to global warming effects.	Global warming effects	- Global warming - Inability to budget for effects - Community divergence of views on risk and response - Building consent liabilities - Erosion, property abandonment - Property floods - Greater costs - Early stormwater asset replacements - Higher capital costs for more resilient assets - Environmental non-compliances due discharges during more frequent extreme weather events - Wastewater overflow incidents increase	100	4	400	Extreme	High	- Asset management plans including risk and event targeted asset upgrades, seawall and other protective measures - Proactive coastal hazards and climate change planning - LGNZ liaison - Council Climate Change Working Group - Self insurance fund (\$250k Capex, \$150k Opex per annum) - Stormwater Plan	- Establish sufficient resource to lead strategy development - Prioritise interventions to preclude house flooding - Mean high water surveys, sea level rise data - GWRC/NIWA - Updating sea level rise model. - Establishment of a community led coastal adaptation programme - Emissions reduction (CEMARS targets)	Senior Leadership Team	Dec-18	Jun-23	On Track	On Track	Target date set to June 2023. GWRC and NIWA have been commissioned to update the Mean High Water Surveys and Sea Level Rise data. The work has been completed and the report is awaited. Coastal hazards work programme involving other Wellington region councils. Project plan is currently being developed and progressing. Continuing to explore projects necessary to reach targeted CO2 emissions reduction by 21/22.
2	Infrastructure Service Disruption Loss of critical infrastructure and services for extended periods are likely to occur in an extreme natural event due to lack of resilience and inadequate insurance arrangements.	Infrastructure service disruption	- Extreme natural event e.g. earthquake, tsunami, flood - Lack of resilience - Uncertainty with Central Govt assurance of 60% loss funding	100	4	400	Extreme	Moderate	- Self insurance \$250k p.a. - Asset replacement programme & condition assessments - Resilience programme - Insurance programme \$130M underground assets - Redundant network - Embedded water storage	- AON / Tonkin Taylor / GNSR vulnerability / resilience modelling - Waikanae WTP clarifier project	GM Infrastructure Services	Dec-18	Jul-20	On Track	On Track	Resilience study gap analysis complete. Remaining phases underway. Significant uncertainty of Central Govt 60% loss contribution in the context of a major event.
3	Asset Investment Decisions Sub-optimal asset investment decisions, due various constraints, could potentially result in poor district outcomes, possible financial losses and/or failure to achieve KPIs.	Asset investment decisions	- Weak strategic vision/plan - Funding limitations, poor prioritization - Expert advice not accepted - Poor or no business case justification	100	4	400	Extreme	Moderate	- Council has limited the Capital programme budget for the first 6 years of 18-38 LTP - Underpinned by Infrastructure and Financial Strategy- Activity management plans - Asset renewal programme - SLT and Council reviews and approvals - Business cases required	- Enhance property asset management practices - Assure other asset management practices and report	GM Infrastructure Services and GM Place and Space		TBD	On Track	Attention	Risk had previously been accepted but now raised from Moderate to Extreme. Morrison Low report critical on property asset management - asset condition information.
4	Iwi Relationships Failure to meet statutory and Memoranda of Partnership obligations to iwi, and to meet the council work programme, may result from an inability to achieve mutual understanding and agreement.	Iwi Relationships	- Lack of access to Te Whakaminenga o Kāpiti - Lack of experience/capacity - External factors e.g. 3 Waters - Treaty claim progression	70	4	280	High	Low	- Proactively monitor and communicate with ART - Consultation and participation policies/contract - Maori Economic Development work programme - Iwi Relationship Manager	- Ongoing conversation with iwi partners about partnership needs and aspirations - Enhanced induction on Iwi matters - Identify further initiatives that can influence positively e.g. GM level interaction with community leaders - Collaborate with iwi through to Te Whakaminenga o Kāpiti to ensure the iwi perspective of risk is incorporated	GM People and Partnerships	Dec-18	TBD	On Track	Attention	Risk reworded to reflect primary goal. No target date set. Exceptional difficulties achieving effective Iwi engagement. Staff capacity issues.

Risk Level Legend

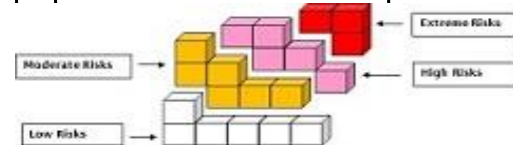


Treatment Update Legend



Risk Statement	Short Description	Cause	Impacts	Consequence (L) Likelihood		Current C*L	Current Risk Level	Target Risk Level	Controls	Treatments	Owner	Target Date Original	Target Date Revised	Previous Treatment Status	Latest Treatment Status	Risk Treatment Update
				70	4											
5 Central Government Policy Uncertainty Unforeseen district impacts/opportunities brought about by new Government policies.	Central Government Policy Uncertainty	Development and introduction of new policies potentially affecting infrastructure development, housing, transport priorities, environmental and community initiatives	-Financial impacts -Government intervention -Delays in projects programmes -Redesign -Priority change -Community dissatisfaction	70	4	280	High	Moderate	- Monitor policy announcements - Develop mitigations and business cases / advocacy / submissions on a case by case basis as issues arise - Clear communication within the organisation	Increase staff capability to enable better decisions (target Aug 19)	GM Corporate Services	Jun-18	Dec-19	On Track	On Track	Cabinet to consider policy advice and new regulatory arrangements (Three Waters Review) in June 19. Research and Policy team vacancies to be filled Aug 19.
6 Staff recruitment and retention Additional costs, high staff stress, poor morale, loss of staff, loss of IANZ accreditation, poor decision making may result from difficulties in recruiting and retaining staff due more attractive work/salaries elsewhere and industry staffing fluctuations.	Staff recruitment & retention	- Competing, more interesting work elsewhere - Fluctuations in some industries (consenting, building inspection) - Less desirable working location for some people - Better salaries elsewhere - FTE cap policy	- Additional costs eg consultants - Delays in critical work programmes, eg economic development strategy - Loss of IANZ accreditation- Shortage of building control staff - Poor staff morale - Less than optimal decision making - Corporate loss of institutional knowledge - Few staff=High workload=High stress	70	4	280	High	Moderate	- Employ contractors/consultants - Succession planning - Workforce planning - Talent management - Short term workload management - Job grade and pay structure reviews - Adjust forward work programmes to align with capability	-Better document/information management; desk files, project plans, asset management systems -Professional Development -Leadership training -A Council-wide staff satisfaction survey has been completed. -Monitoring staff work loads	Organisational Development Manager	Jun-19	Dec-19	On Track	On Track	Loss of institutional knowledge with departures; a multi council issue. - RMA area - Building area - Development engineer Multiple appointment rounds. Proposed new emphasis on better information management, desk files etc
7 Fraudulent Activity Fraudulent activity could occur undetected due to inadequate monitoring, lack of strong physical and process controls resulting in financial loss, business interruption and reputational damage.	Fraudulent activity	- Inadequate monitoring of processes and transactions - Lack of strong physical and process controls - Unauthorised misappropriation of council assets Procurement agility versus conflicts of interest	- Financial loss - Business interruption - Reputational damage	70	3	210	High	Low	- Maintain fraud awareness - Protected disclosures - Employee screening - Statutory year end audits - Internal controls - Fraud management framework	-Fraud awareness training -Enterprise risk management -Internal audit programme (as resources allow)	GM Corporate Services	Feb-21		On Track	On Track	The procurement improvement programme is continuing to progress well. The next review to be completed is unusual transactions.
8 Business Disruptions Following a disruptive incident; extended non delivery of core services, financial losses, reputational damage could result due to lack of Business Continuity Plans (BCPs).	Business disruptions	- Lack of BCP's - Lack of staff awareness / training - Lack of staff - Disruptive events - Over-reliance on key staff capability	- Financial losses - Reputational damage - Non-delivery of core services - H&S compromised	70	3	210	High	Low	- Specific corporate BCPs in place - Continuity Leadership Team (CLT)	-Business Continuity Management System project resourced and underway -Development and testing of organisation wide BCPs	Senior Leadership Team	Dec-18	Jun-20	On Track	On Track	New BCPs developed for Water Supply, Wastewater, Water testing Lab, Electoral process. Reviewed and amended CLT roles and responsibilities.
9 Paraparamu Wastewater Treatment Plant Consent - Legislative change could result in reduced number of viable options and higher discharge standards at substantial cost to further treat/dispose. - Poor investigations, assessments and/or iwi engagement result in unsuccessful application.	Paraparamu Wastewater Treatment Plant Consent	- Restrictive provisions introduced in the proposed natural resources plan or subsequent Whaitua process. - Submissions to application upheld and new consent not issued	- Costly additional works required to consent WWTP - More onerous discharge conditions require substantial upgrade to WWTP - Failure to secure consent limits growth and development	100	2	200	High	Moderate	- Comprehensive consenting strategy include risk assessment and mitigations - Professional services contract aligned to risk mitigation actions including engagement and consultation strategies	-Track PNRP and Whaitua Processes -Close working relations with GWRC through the development of the AEE and options assessments -Maintain and strengthen iwi/community relationships -New consenting strategy	GM Infrastructure Services	Jun-18	Jun-22	On Track	Attention	Significant uncertainty due engagement challenges with Iwi. Project Phase 2 underway - Governance and project management structure.

Risk Level Legend

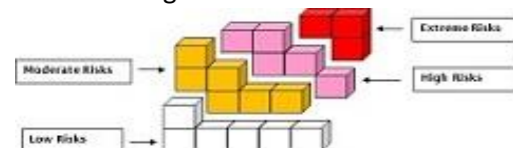


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10	Programme Delivery (Revised, was Programme Budgets) Planned project delivery could be compromised due unforeseen events.	Programme delivery compromised	- Poor project management, procurement etc - Potential global economic crisis - Unforeseen cost pressures - Design / scope changes	- Projects not delivered as planned - Financial losses - Reputational damage - Non delivery of core services	40	5	200	High	Moderate	Quarterly reports of performance (financial and non-financial) of council's priority projects are provided to the Operations and Finance Committee. - In-house PMO - Risk management - Regular financial reporting and monitoring - Rationalised capital project programme budget for the first 6 years of the 18-38 LTP	- Continue to develop financial management capability - Continue to develop capability of in-house PMO function - Continue to improve risk management awareness and capability - More extensive asset inventory - More conservative/resilient forward programme - Roll-out of project management techniques and educate new/existing staff - Council has limited the Capital programme budget for the first 6 years of 18-38 LTP	Senior Leadership Team	Jun-19		On Track	On Track	Quarterly reports of performance (financial and non-financial) of council's priority projects are provided to the Operations and Finance Committee.
11	Health & Safety Harm occurs due to inadequate safeguards against extreme events and/or hazardous environments.	Health and safety (Permanent item on register)	- Extreme events (eg natural hazard) - Hazardous environments - Poor hazard identification - High consequence areas include Hazardous substances, Contractor Management, Asbestos, Driving	- Injuries to people - Loss of reputation - Penalties, fines - Welfare staff exposure	100	2	200	High	Low	- H&S Wellbeing role - Health and safety management systems - Asbestos management plan - Care register - Working alone policy - Resilience training, safety in the workplace	- Consolidate H&S Committee - Risk based approach focus on Asbestos Hazardous substances Contractor management Driving	Senior Leadership Team	Feb-22		On Track	On Track	Asbestos register encompassing all council buildings established, supporting management plan to be developed HSWA 2 year integrated action plan (incl Hazardous Substances) developed, phase 1 complete.
12	Financial Management Actual costs exceed budget due poor financial management (revised wording)	Poor Financial Management	- Poor financial controls and monitoring - Unforeseen events	- Actual costs exceed budgets - Financial losses - Reputational damage - Non-delivery of core services	40	4	160	Moderate	Low	- Monthly management reports provided to budget managers - SLT provided with monthly management report identifying financial risks - Quarterly financial and non-financial performance reporting to council	- Procurement improvement programme - PMO - Risk management - Financial management awareness training	GM Corporate Services	Dec-18	Jun-20	On Track	On Track	Target date extended 12 months (was June 19). Procurement improvement programme continuing to progress well.
13	New Asset Operational Deficiencies Assets transferred to KCDC are not fit for purpose due to lack of quality in design/construction.	New Asset Operational Deficiencies	District Plan and consenting processes do not guarantee good design and/or sustainable assets Lack of proper design consideration up front Planning processes do not always meet engineering requirements	High costs to maintain or replace	40	4	160	Moderate	Low	- District Plan - Consent processes - Hand over processes - SDPR process	Review resourcing Business Improvement Team working on subdivision processes including approval of s224 certificate in consultation with internal stakeholders.	GM Infrastructure Services GM Regulatory Services GM Place and Space	Dec-18	Jun-20	On Track	Attention	Resourcing to be reviewed. Target date extended 12 months (was June 19) Slower progress than anticipated on subdivision processes and, to a lesser extent SDPR due lack of resource and competing priorities.

Risk Level Legend

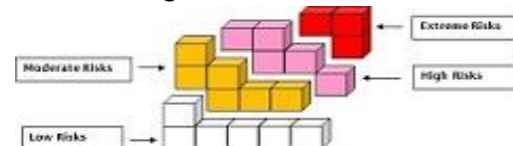


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14 Significant Contractual Disputes Contractual obligations not met or breached by the principal and/or contractor leading to disputes.	Significant Contractual Disputes	Required contract management processes not followed, lack of consistency	- Costs, fines - Dispute - Arbitration - Judicial review -Reputation	70	2	140	Moderate	Moderate	Contract Management Processes	-Review current practices to ensure process consistency -Continuous improvement	GM Infrastructure Services	Dec-18	Accept	On Track	On Track	Risk accepted. Procurement process improvements have provided for better understanding of risks. Work yet to be undertaken to review contract documents.
15 Community Engagement Challenges in understanding and achieving optimal engagement with the community could lead to delays to critical works and reputational damage.	Community Engagement	- Need to extensively consult - Legislative requirements - Community desire transparency and participation - Business planning deficiencies - Community perception of council - Silo'd activities	- Reputational damage - Delays to critical works - Raising community expectations but disconnect with current resources - Reputational damage through lack of progress - Lack of progress - People opt out	40	3	120	Moderate	Moderate	- Consultation processes - Significance and engagement policies - Communication & engagement strategy - LG Act requirements - Connecting the dots; blend / extend consultation topics	Slow down and be more deliberate	GM Corporate Services GM People and Partnerships	Dec-18	Accept	On Track	On Track	Draft 19/20 annual plan information process completed successfully. 13 feedback responses received for further council consideration. #lovemybeach #lovemyneighbour
16 Open for Business Poor customer perceptions of council, financial losses, legal challenges, developer dissuasion and reputational damage could likely result if the Open for Business initiative is not implemented or successful. Also refer "Engagement Fatigue" and "Staff Recruitment and Retention" risks	Not "Open for Business"	- Systems and processes not fully fit for purpose - Expert advice ignored - Poor customer service culture - Staff capacity / capability	- Reputational damage – council perceived as not helpful - Dissuades new developers - Sued - Loss claims - H&S compromised - Legal challenges - Financial losses	40	3	120	Moderate	Low	- "Open for Business" initiative - Case/project management - Pre-application meetings -Business start-up meetings -Meeting with developers -Structural and cultural changes	-Continue to build on "Open for Business" initiative -Enhance systems and processes -Improve customer service culture -Ensure timely delivery -Integrated services -Working with the Chamber of Commerce	Senior Leadership Team	Dec-18	Dec-19	On Track	On Track	Successful meetings undertaken with developers, reps and activity managers to examine processes. Open for Business initiative being refreshed.
17 High Debt (revised, was Borrowing Levels) Potential inability to increase debt funding in the future constraining council's ability to deliver (revised wording)	High Debt	-Trying to meet community expectations but lack of willingness to pay	- Inability to increase debt - Debt cap breached faster - High interest costs - Financial losses - Reputational damage - Non-delivery of core services	40	3	120	Moderate	Low	- Infrastructure strategy - Rating system - Strong treasury management with quarterly treasury performance reporting to A&R Committee	- Focus on green line strategy and on capital expenditure that provides for resilience and growth - Reprioritise to ensure borrowings stay below 200% of operating income -Developer contributions and other funds -Central government funding, provincial growth fund -Continue to seek alternate funding sources and/or increase non-rates funding sources to keep debt down	Chief Executive	Feb-21		On Track	On Track	Focus on our green line strategy and our commitment to reducing borrowings through focusing on capital expenditure that improves our district's resilience and provides for growth. We will also continue to actively reprioritise our capital programme within agreed budgets to ensure our borrowings stay below 200% of operating income.

Risk Level Legend

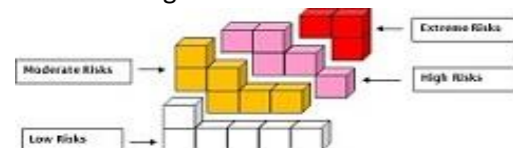


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				(C) onsequence	(L) likelihood											
18 Emergency Response Financial loss and reputational damage may result during a significant natural event due to a lack of preparedness, lack of unified response approach and loss of key staff.	Emergency response	- Community expectations WREMO expectations evolving - Lack of preparedness and unified response approach - Loss of limited key staff	- Reputational damage - Financial loss - Injuries, fatalities	100	1	100	Moderate	Low	- WREMO response plan - CD and emergency management systems - CD training and exercises	-Community resilience -Work with WREMO -Review emergency management plans and staff capability/resources -Enterprise risk management -New infrastructure resilience	GM Place and Space	Dec-18	Jun-19	On Track	On Track	EOC building safety reviewed and assessed adequate. Staff attendance has significantly improved at training sessions despite competing priorities. Lack of capacity to fill EOC rosters.
19 Drinking Water Safety Threat to sufficient water supply and delivery of safe drinking water. Also refer "Central Government Policy Uncertainty" risk.	Drinking Water Safety	Insufficient source capacity due climate change, drought Contamination Natural disaster Lifeline Infrastructure failures (part of criticality framework for our assets)	-Reputational damage -Noncompliance with critical NZDWS element (Note we don't fully comply with all non-critical NZDWS on all schemes currently) -Water shortages -Community dissatisfaction	100	1	100	Moderate	Low	-All water supplies treated with multi-barrier approach -Water conservation and use management procedures -Network water quality sampling programme in place to meet NZDWS -Water safety plans 3 of 4 being updated currently and incorporate critical control points as per Havelock N -Joint working group with Councils in the Wellington region working collaboratively on water safety -Routine infrastructure inspections and condition inspections -SOPs and hygiene protocols -Water Supply Bylaw	-Water safety and resilience works programme \$15m 2018-22 -Bulk mains condition assessment \$90k 2018-20 -Backflow risk management \$40k 2018/19 -Water safety plan updates \$15k 2018/19 -Drinking water emergency response plan 2018/19 -Otaki water supply reservoir 2024-26	GM Infrastructure Services	Dec-19	Jun-22	On Track	On Track	Awarded Water Professional Service Panel, procured water safety resilience consultancy Regional workshops carried out.
20 Economic Development & District Growth Less actual economic development and growth than planned may occur and result in higher rates increases being required or levels of service reduced.	Uncertainty in economic development and district growth	- Lack of capability to accurately predict / forecast -Inherent uncertainty in growth forecasts - Divergent views on how Kapiti should develop - Expressway reshaping Kapiti	-Suboptimal district outcomes - Ad-hoc development and business growth unpredictable - Higher rates due lower than predicted growth -PGF funding	40	2	80	Moderate	Moderate	- Current forecasts - Constant review - Monitoring and quarterly reporting on resources and business land demand and supply underway (NPS-UDC) - Monthly / quarterly reporting A robust development contributions policy and scheme	- Economic Development refresh being implemented; - Review Development Management Strategy - Review Economic Development Strategy. - More targeted business and visitor attraction policies - PGF / WIP development and applications	GM Place and Space		Accept	On Track	On Track	Level of risk accepted however subject to continuous improvement. Economic Development refresh being implemented. District Growth - NPS-UDC 3 yearly report by June Strategy to be revisited and refreshed
21 Procurement Process Compliance Successful tenderer objection to procurement process. Failure to follow procurement processes	Procurement Process Failure	Tender process not followed	Costs, fines, reputation damage	40	2	80	Moderate	Moderate	-Procurement processes -Audits	Continuous improvement	GM Infrastructure Services		Accept	On Track	On Track	Level of risk accepted however subject to continuous improvement.
22 Environmental Compliance Harm to the environment, costs, fines due not following processes are failure to identify risks.	Environmental Non-compliance	Process not followed or risks not anticipated	-Costs, fines -Environmental harm -Reputation damage	40	2	80	Moderate	Moderate	Consent processes Operational procedures Risk management CSVue compliance management system introduced as a pilot	Greater awareness, ownership of consents and more rigorous approach to compliance achieved through CsVue	GM Infrastructure Services		Accept	On Track	On Track	Level of risk accepted however subject to continuous improvement. Greater awareness, ownership of consents and more rigorous approach to compliance achieved through CsVue

Risk Level Legend



Treatment Update Legend

