

# Report

Report to:	<b>Lanarkshire Valuation Joint Board</b>
Date of Meeting:	<b>5 March 2018</b>
Report by:	<b>Assistant Assessor and Electoral Registration Officer</b>

Subject:	<b>Risk Register Update 2018</b>
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## 1. Purpose of Report

1.1. The purpose of the report is to:-

- ◆ Present to members of the Joint Board, for information, notice that the Board's Risk Register has been reviewed and updated for 2018.

## 2. Recommendation(s)

2.1 The Board is asked to approve the following recommendation

(1) that the content of the report be noted

## 3 Background

3.1 The report is entitled 'Lanarkshire Valuation Joint Board – Risk Register Update 2018' and the Risk Register is attached as Appendix 1. The Risk Scoring Matrix is also attached, for information, as Appendix 2.

3.2 Lanarkshire Valuation Joint Board's Organisational Risk Register has been fully reviewed by LVJB's management team. It has been updated to reflect a reassessment of existing risks on the register and to document new risks which have emerged over the recent period. Each risk within the register has been allocated to individual members of the management team to monitor on an ongoing basis. The Risk Scoring Matrix explains how the Inherent and Residual Risk are decided.

3.3 At the review undertaken in early 2018, 38 risks were identified and they can be summarised as follows:-

<u>Residual Risk Score</u>	<u>Number</u>
High (7-9)	4
Medium	13
Low	21

The high risks are:

<b>Risk reference number</b>	<b>Classification</b>	<b>Key risk</b>	<b>Residual risk score</b>
LVJB/09/18	Operational, Continuity and Performance, Political, Financial	Insufficient funding from Cabinet Office for Individual Electoral registration leading to failure to achieve statutory duty.	<b>8</b>
LVJB/19/18	Financial	Lack of funding for dealing with appeals relating to electricity subjects.	<b>8</b>
LVJB/20/18	Financial	Lack of funding for valuation of electricity subjects which fall under the non domestic ratings (valuation of utilities) (Scotland) Order 2005. Failure to comply with the statutory duty could lead to a potential loss of income for the Scottish Government.	<b>7</b>
LVJB/24/18	People	Failure to recruit and /or retain qualified valuation staff.	<b>7</b>

#### **4 Employee Implications**

4.1 None.

#### **5 Financial Implications**

5.1 Financial issues in relation to the Risk Register are covered annually as part of the budgetary process and discussions with the Treasurer to the Board.

#### **6 Other Implications**

6.1 There are no implications for risk or sustainability in terms of the information contained in this report.

6.2 Failure to demonstrate that risk is actively considered and managed can not only lead to avoidable financial loss but could also adversely affect delivery of services and could affect LVJB's reputation.

#### **7 Equality Impact Assessment and Consultation Arrangements**

7.1 This report does not introduce a new policy, function or strategy or recommend a change to an existing policy, function or strategy and, therefore, no impact assessment is required.

7.2 There is no requirement for consultation in respect of this report.

## **8. Privacy Impact Assessment**

- 8.1 This report does not introduce a new policy, function or strategy or recommend a change to an existing policy, function or strategy and, therefore, no impact assessment is required.

**David Combe**

**Assistant Assessor and Electoral Registration Officer**

16 February 2018

## **Previous References**

Report to Board for 13 March 2017 meeting entitled – Risk Register Update 2017

## **List of Background Papers**

None

## **Contact for Further Information**

If you would like to inspect the background papers or want further information, please contact:-

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**LVJB Risk Register**  
**Reviewed January 2018**

<b>Risk reference number</b>	<b>Allocated to</b>	<b>Classification</b>	<b>Key risk</b>	<b>Description of risk</b>	<b>Inherent risk score</b>	<b>Controls in place</b>	<b>Residual risk score</b>
LVJB/01/18	<b>JN</b>	Operational, Continuity and Performance	Loss or damage to communications cabinet.	Loss or damage to communications cabinet due to water ingress. There is a history of water ingress due to construction of the building.	<b>5</b>	1) Regular inspection of comms room for water ingress. 2) Verbal agreement with landlord re reporting and subsequent repairs to leaks. 3) Liaise with landlord on any issues.	<b>2</b>
LVJB/02/18	<b>JN/DC</b>	Operational, Continuity and Performance	Large reductions in rating valuations.	Large reductions in rating valuations.	<b>8</b>	1) Ensure adequate checking and authorising procedures are in place in relation to valuations of non domestic subjects. 2) Actively participate within Scottish Assessors Association to ensure consistency.	<b>3</b>
LVJB/03/18	<b>JN/DC</b>	Operational, Continuity and Performance	Inability to deal with increase in non domestic appeals activity.	Upsurge in non-domestic appeal activity. This leads to greater time spent by LVJB staff on handling appeals.	<b>8</b>	1) Structured non domestic appeal disposal programme. 2) Regular case review meetings. 3) Agree disposal strategy of non domestic appeals with SAA where appropriate. 4) Regular meetings with LVJB's IT Business Systems Manager covering risk issues. 5) Monitored by Revaluation Strategy Group.	<b>3</b>
LVJB/04/18	<b>JN</b>	Operational, Continuity and Performance	Lack of central IT support.	Lack of central IT support for LVJB provided by constituent authorities.	<b>8</b>	1) Service Level Agreement with constituent authority - requires to be reviewed 2) IT Business Systems Manager attends for relevant part of LVJB Management Team meetings.	<b>4</b>

## Appendix 1

Risk reference number	Allocated to	Classification	Key risk	Description of risk	Inherent risk score	Controls in place	Residual risk score
LVJB/05/18	<b>JN</b>	Operational, Continuity and Performance	Lack of comprehensive business continuity programme, includes loss of services (gas, water, electricity).	Lack of comprehensive business continuity programme, includes damage to building, loss of services (gas, water, electricity).	<b>4</b>	1) Business Continuity Plan developed in 2012 and reviewed annually. 2) SLA with SLC IT - requires to be reviewed	<b>2</b>
LVJB/06/18	<b>GB</b>	Operational, Continuity and Performance	Failure to revise/maintain/update service plan.	Failure to revise/maintain/update service plan on an annual basis.	<b>4</b>	1) Service Plan reviewed annually and reported to Board. A new service plan was devised for the period Jan 2016 to Dec 2018 and noted by the Board.	<b>2</b>
LVJB/07/18	<b>TR</b>	Operational, Continuity and Performance	SLC payroll staff make changes.	SLC payroll staff make changes to salaries or deductions without prior LVJB authorisation.	<b>3</b>	1) Use of the monthly payroll and establishment list. 2) Budget Monitoring Process: check of monthly salaries to estimates. 3) Budget Monitoring Process: check of monthly salaries to PDR rises/incremental rises.	<b>1</b>
LVJB/08/18	<b>GH/AB</b>	Operational, Continuity and Performance	Comply with boundary reviews as determined by the Boundary Commission	Properties/electors in wrong wards and/or polling stations	<b>6</b>	1) Any boundary reviews to be managed via specific project, consisting of Project Manager and Project Team reporting directly to the Assessor and ERO.	<b>1</b>
LVJB/09/18	<b>GB</b>	Operational, Continuity and Performance, Political, Financial	Insufficient funding from Cabinet Office for Individual Electoral registration leading to failure to achieve statutory duty.	Failure to obtain adequate funding for Individual Electoral Registration duties could lead to failure to meet additional duties as a result of the introduction of IER.	<b>9</b>	1) Continue to make representations to the Cabinet Office where additional funding for IER is required. 2) Submission of Joint Led Bids to Cabinet Office.	<b>8</b>

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Risk reference number	Allocated to	Classification	Key risk	Description of risk	Inherent risk score	Controls in place	Residual risk score
LVJB/10/18	<b>GB</b>	Operational, Continuity and Performance, Political, Financial	Insufficient funding from constituent authorities to undertake electoral registration duties.	Failure to obtain adequate funding for delivery of electoral registration duties.	<b>7</b>	1) Continue to make representations to the Constituent Authorities where it is felt that funding is inadequate to deal with electoral registration.	<b>3</b>
LVJB/11/18	<b>JN</b>	Operational, Continuity and Performance, Political, Financial	Failure to be compliant with Public Service Network criteria and affect on ability of LVJB staff to carry out their duties.	Complying with PSN requirements.	<b>2</b>	1) Ongoing dialogue with SLC IT Business Systems Manager. 2) Continuous monitoring of PSN compliance for LVJB. 3) LVJB designated PSN compliant for 2017, re-registration process for 2018 is nearing completion. 4) Accreditation is renewed annually.	<b>1</b>
LVJB/12/18	<b>DC</b>	Operational, Continuity and Performance, Political, Financial	Failure to fully comply with Disclosure Scotland and affect on ability of LVJB staff to carry out their duties.	Complying with Disclosure Scotland requirements.	<b>9</b>	1) All existing staff Disclosed. 2) Disclosure for new staff part of recruitment process. 3) LVJB staff are required to notify senior management of any criminal charges or convictions.	<b>3</b>
LVJB/13/18	<b>DC</b>	Operational, Continuity and Performance, Political, Financial	Failure to comply with the Public Service Network (PSN) requirement that canvassers fully comply with Disclosure Scotland and the subsequent effect on ability of LVJB to recruit	Complying with Disclosure Scotland requirements	<b>9</b>	1) All new canvass staff Disclosed. 2) Re-employed canvassers to supply a completed criminal convictions form.	<b>3</b>

## Appendix 1

Risk reference number	Allocated to	Classification	Key risk	Description of risk	Inherent risk score	Controls in place	Residual risk score
			sufficient canvassers to carry out their duties.				
LVJB/14/18	<b>GB</b>	Operational, Continuity and Performance, Political, Financial	Failure to deliver Registers and data exports in time for elections.	Inability to deliver Registers to RO's in connection with elections and other data extracts such as for Absent Votes and Poll Cards.	<b>9</b>	<ol style="list-style-type: none"> <li>1) Election plan, including a specific risk register, in place for each election.</li> <li>2) Meeting with RO staff in run-up to elections.</li> <li>3) Attendance at ERCOM, AEA &amp; EC meetings.</li> <li>4) Rigorous software testing.</li> <li>5) Staff training.</li> </ol>	<b>4</b>
LVJB/15/18	<b>GB</b>	Operational, Continuity and Performance, Political, Financial	Inability to process registration applications due to voluminous levels received in the run up to an election.	Receipt of voluminous registration applications, in the run-up to a major or snap election/referendum, leading to difficulties in timeously processing these. Exacerbated by the inability of the Digital Service to provide a registration look-up service which leads to a significant increase in duplicate applications.	<b>9</b>	<ol style="list-style-type: none"> <li>1) LVJB's Management Team will consider the use of valuation staff to deal with any spike in registration applications.</li> <li>2) Analysis of duplicate applications undertaken to assist with future resource planning, particularly for snap elections.</li> <li>3) Mock elections undertaken to test procedures.</li> <li>4) Election plan, including a specific risk register, in place for each election.</li> </ol>	<b>4</b>
LVJB/16/18	<b>DC</b>	Operational, Continuity and Performance, Political, Financial	Failure to comply with statutory duties as a result of inability to source adequate bulk mailing, printing and scanning supplier.	Unable to source supplier for printing, mailing and scanning.	<b>7</b>	<ol style="list-style-type: none"> <li>1) Bulk printing, mailing and scanning contract in place until November 2018.</li> <li>2) Liaison with SLC procurement.</li> <li>3) Project team to be put in place to ensure business continuity beyond contract end date.</li> </ol>	<b>4</b>

## Appendix 1

Risk reference number	Allocated to	Classification	Key risk	Description of risk	Inherent risk score	Controls in place	Residual risk score
LVJB/17/18	<b>GB</b>	Financial	Insufficient budget from SLC/NLC.	Insufficient budget from SLC/NLC could lead statutory duties not being undertaken.	<b>9</b>	<ol style="list-style-type: none"> <li>1) Realignment of budgets.</li> <li>2) Quarterly meeting with Treasurer to the Board to discuss budgetary matters.</li> <li>3) Notification to clerk as part of budget planning.</li> <li>4) Notification to the board as part of budget planning.</li> <li>5) Monitor Revenue budget at monthly management meetings.</li> <li>6) Three year budgetary planning.</li> </ol>	<b>4</b>
LVJB/18/18	<b>GB</b>	Financial	Lack of control over costs.	Lack of control over costs - Valuation Appeal Panels, Central Recharges, Print Contracts, Property and additional workload due to legislative changes.	<b>9</b>	<ol style="list-style-type: none"> <li>1) Realignment of budgets.</li> <li>2) Quarterly meeting with Treasurer to the Board to discuss budgetary matters.</li> <li>3) Notification to the board as part of budget planning.</li> <li>4) Monitor Revenue budget at monthly management meetings.</li> <li>5) Three year budgetary planning.</li> </ol>	<b>6</b>
LVJB/19/18	<b>GB</b>	Financial	Lack of funding for dealing with appeals relating to electricity subjects..	Current LVJB budget does not include funding for appeal cases which proceed to the Lands Tribunal in relation to electricity subjects.	<b>9</b>	<ol style="list-style-type: none"> <li>1) Regular meetings of LVJB's in house electricity team to ensure values are robust.</li> <li>2) Continue dialogue with relevant agents and companies in relation to the valuation of electricity subjects.</li> <li>3) A fee structure has been agreed with various chambers for representation by counsel.</li> <li>4) The Treasurer has been made aware of this risk.</li> <li>5) Extensive discussions with industry representatives for the</li> </ol>	<b>8</b>



**Appendix 1**

<b>Risk reference number</b>	<b>Allocated to</b>	<b>Classification</b>	<b>Key risk</b>	<b>Description of risk</b>	<b>Inherent risk score</b>	<b>Controls in place</b>	<b>Residual risk score</b>
						2017 Revaluation for these subjects, resulting in agreements reached for certain Valuation Roll entries.	
LVJB/20/18	<b>GB</b>	Financial	Lack of funding for valuation of electricity subjects.	Lack of funding for valuation of electricity subjects which fall under the non domestic ratings (valuation of utilities) (Scotland) Order 2005. Failure to comply with the statutory duty could lead to a potential loss of income for the Scottish Government.	<b>9</b>	1) Notification to the Treasurer as part of budget planning. 2) Representations made to SAA Utilities Committee, who in turn have been tasked with contacting the Scottish Government re funding model for Designated Assessors.	<b>7</b>
LVJB/21/18	<b>TR</b>	Financial	Lack of adequate insurance cover in place for LVJB.	Lack of adequate insurance cover in place for LVJB.	<b>8</b>	1) Annually review levels of insurance cover. 2) Insurance policies subject to tender process. Five year agreement currently in place and due for renewal in 2021. 3) LVJB consults with SLC Insurance Risk Section to obtain professional advice on level of cover. 4) Annual check to ensure cover is continued and premiums paid on time.	<b>2</b>
LVJB/22/18	<b>GB</b>	People	Industrial action.	Industrial action by staff as a result of Government budget savings, pension changes, tax rises, pay freezes etc.	<b>8</b>	1) Partnership working with stakeholders. 2) Grievance procedures in place. 3) Joint Trades Union Congress participation. 4) Joint Consultative Committee Structures.	<b>5</b>

## Appendix 1

Risk reference number	Allocated to	Classification	Key risk	Description of risk	Inherent risk score	Controls in place	Residual risk score
LVJB/23/18	<b>GH/AB</b>	People	Difficulty in recruiting canvassers (temporary staff).	Difficulty in recruiting canvassers. The fees paid insufficient to attract temporary canvassers.	<b>7</b>	1) Ensure payment structure is adequate. 2) Regular meetings with SLC/NLC to contact all Council employees if additional canvassers required. 3) Contact Returning Officers staff if additional canvassers required. 4) Regular meetings with Personnel Services about recruitment policies. 5) Canvasser assessment framework ensures effective canvassers re-employed.	<b>4</b>
LVJB/24/18	<b>DC</b>	People	Failure to recruit and/or retain qualified valuation staff.	Failure to retain or recruit staff including those with appropriate qualifications e.g. RICS.	<b>9</b>	1) Work life balance/conditions of service/personnel policies/job families. 2) PDR process. 3) Recruitment of trainee Valuers, employed when appropriate, with structured training scheme in place. 4) Offer to existing staff of training/professional qualifications where deemed appropriate.	<b>7</b>
LVJB/25/18	<b>DC</b>	People	Health epidemic.	Health epidemic could lead to staff shortages and reduction in service provided.	<b>5</b>	1) Personnel Circulars monitored and reported to management team meetings and bulleted to staff. 2) Provision of controls as advised by HSE (e.g. antiseptic hand gel). 3) Information via email/MTM bullet points.	<b>2</b>

## Appendix 1

Risk reference number	Allocated to	Classification	Key risk	Description of risk	Inherent risk score	Controls in place	Residual risk score
						4) Promotion by SLC of healthy living.	
LVJB/26/18	<b>IN/SL</b>	People	Injury/death/physical or verbal assault of Valuation/ERO staff or service users.	Injury/death/assault of Valuation/ERO staff whilst undertaking duties, or service users.	<b>6</b>	1) Risk Assessments carried out. 2) Personal Safety Policy in place. 3) Occupational Health and Safety Management System in operation. 4) Training and instruction provided to staff. 5) Communication with SLC in relation to common areas.	<b>3</b>
LVJB/27/18	<b>DC</b>	People	Changes to conditions of service.	Changes to conditions of service, pensions, holidays, etc. could cause general staffing issues.	<b>7</b>	1) Maintain contact with Personnel in relation to any changes. Monthly meetings with SLC Personnel representative. 2) Maintain awareness of such issues across industry in general. 3) Maintain effective communication with staff and staff representatives (industrial relations). 4) Allow staff time to attend briefings on legislative changes likely to impact conditions of service (e.g. pension changes). 5) Personnel Bulletins/Team briefing notes provided to all employees.	<b>4</b>
LVJB/28/18	<b>DC</b>	People	Lack of adequate skills/qualifications/training	Lack of adequate skills/qualifications/training in existing workforce.	<b>7</b>	1) Personal Development Review Process. 2) Training strategy (3 year plan).	<b>2</b>

Appendix 1

Risk reference number	Allocated to	Classification	Key risk	Description of risk	Inherent risk score	Controls in place	Residual risk score
						3) APC/RICS Training. 4) Continual appraisal of organisational structure. 5) AEA training.	
LVJB/29/18	TR	Regulatory/ Legislative	Failure to comply with FOI and Data Protection legislation.	Failure to comply with legislation – leading to consequent failure to achieve statutory duties.	6	1) FOI Policy & Procedures in place. 2) Monitor via LVJB Management Team Meetings. 3) Staff training. 4) Data Protection Policy and procedures in place. 5) Information retention schedules in place. 6) Privacy Impact Assessments procedure in place and undertaken when appropriate. 7) Adhere to SLC's Information Security Policy. Disclosure Scotland procedure in place. Conditions of Service require that staff notify management of any criminal convictions. 8) Office wide clear desk procedure implemented. 9) New data sharing staff guidelines developed in January 2018. 10) Manager qualified as a Certified Data Protection Practitioner. 11) Data protection privacy statement on LVJB website 12) Legal requirement of GDPR currently being considered as is the UK Data Protection Bill.	1

## Appendix 1

Risk reference number	Allocated to	Classification	Key risk	Description of risk	Inherent risk score	Controls in place	Residual risk score
LVJB/30/18	<b>DC</b>	Regulatory/ Legislative	Failure to comply with Part 1 of the Public Records (Scotland) Act 2011 to prepare and submit a records management plan for approval by the Keeper of Records and to ensure that LVJB's public records are managed in accordance with the agreed plan.	Failure to prepare a Plan that is agreed by the Keeper of Records and ensuring that LVJB's public records are managed in accordance with the agreed plan.	<b>6</b>	<ol style="list-style-type: none"> <li>1) Dedicated Records Manager.</li> <li>2) Prepare approved retention schedules replace with "Business classification scheme, retention schedule and disposal arrangements".</li> <li>3) Approved records management plan in place.</li> <li>4) Records management issues monitored via monthly management team meetings.</li> <li>5) Manager qualified as a Certified Data Protection Practitioner.</li> <li>6) Records Management Policy.</li> <li>7) Adhere to SLC's Information Security Policy. All staff vetted to a basic level by Disclosure Scotland.</li> <li>8) Business Continuity Plan.</li> <li>9) Data Protection Policy.</li> <li>10) Office wide clear desk procedure implemented.</li> </ol>	<b>3</b>
LVJB/31/18	<b>GH/AB</b>	Information and Technology	Failure of Eros Software during canvass/election.	Failure of Eros Software during canvass/election.	<b>7</b>	<ol style="list-style-type: none"> <li>1) Attend software provider workshops.</li> <li>2) Software support and maintenance agreement in place.</li> <li>3) Regular back-ups of system data taken.</li> <li>4) Testing prior to elections/ canvass to ensure system resilience.</li> <li>5) Regular dialogue with software suppliers and attendance at supplier run events.</li> </ol>	<b>4</b>

## Appendix 1

Risk reference number	Allocated to	Classification	Key risk	Description of risk	Inherent risk score	Controls in place	Residual risk score
						6) Regular software updates.	
LVJB/32/18	<b>JN</b>	Information & Technology	Total computer/communications failure.	Total computer/communications failure could cause disruption to the services provided.	<b>9</b>	1) Disaster recovery in place for servers – backup off-site. 2) SLA with constituent authority - requires to be reviewed.	<b>4</b>
LVJB/33/18	<b>JN</b>	Information & Technology	Failure of the Scottish Assessors' Association portal web site.	Failure of the Scottish Assessors' Association portal web site could lead to a significant increase in enquiries from service users to LVJB.	<b>3</b>	1) Portal suppliers have documented procedures for dealing with such situations.	<b>1</b>
LVJB/34/18	<b>TR</b>	Reputation	Claims submitted against LVJB.	Claims submitted against LVJB for negligence or failure to comply with legislation (equality/discrimination).	<b>7</b>	1) Identify in Service Plan responsible officers for key undertakings to ensure ownership. 2) Monitor via LVJB team meetings. 3) Provision of Training to Employees/Managers on Equality and Diversity legislation. 4) Compliance with general and specific duties determined by relevant legislation. 5) Ensure adequate Public Liability insurance is in place.	<b>4</b>
LVJB/35/18	<b>DC</b>	Environmental	Severe weather.	Severe weather could result in surveys and canvassing etc. being unable to be carried out due to unsafe conditions or staff unable to travel to work place.	<b>5</b>	1) Skeleton staff availability. 2) Reduced hours working. 3) Alternative working arrangements sought with SLC Personnel in such circumstances. 4) Comply with OHSMS. 5) Winter Awareness/Adverse	<b>3</b>

## Appendix 1

Risk reference number	Allocated to	Classification	Key risk	Description of risk	Inherent risk score	Controls in place	Residual risk score
						Weather Statement in place.	
LVJB/36/18	<b>LVJB Mgt Team</b>	Operational, Continuity and Performance, Political, Financial	Implementation of recommendations set out in Barclay Review	Implementation of three yearly Revaluations, with a one year tone date. Requirement to achieve consistency between Assessors. Review of Plant and Machinery regulations with a focus on renewable energy sector valuations. Possibility of requirement to enter subjects in the Valuation Roll that are currently excluded by legislation.	<b>9</b>	1) SAA Action Plan developed 2) SAA issues log in place to promote consistency. 3) SAA Executive meet with Scottish Government officials and are involved in various forums formed as a result of the Barclay Review 4) Three year budgetary planning. 5) Meetings of LVJB's Electricity Group. 6) Meetings of Revaluation Strategy Group.	<b>5</b>
LVJB/37/18	<b>LVJB Mgt Team</b>	Operational, Continuity and Performance, Political, Financial	Lease of current office expires in May 2021.	Possibility of not agreeing new terms of lease.	<b>9</b>	1) Discussions to be undertaken to re-negotiate the lease with the landlord and explore options.	<b>2</b>
LVJB/38/18	<b>LVJB Mgt Team</b>	Operational, Continuity and Performance, Political, Financial	Inadequate staff numbers to undertake all statutory duties.	Statutory functions not undertaken	<b>4</b>	1) Workforce Plan implemented. 2) Flexible Retirement Policy and Flexible Working Policy available and utilised to retain experienced staff.	<b>1</b>

**Risk Scoring**

**Impact 1 to 3**

1. Will cause some problems but could be managed
2. Will cause significant delay or interruption to our service
3. Could cause our service to fail

**Likelihood 1 to 3**

1. Unlikely but could happen
2. Likely to happen
3. Very likely or already happening

**Scoring matrix**

<b>I M P A C T</b>	3. Could cause our service to fail	<b>4</b>	<b>7</b>	<b>9</b>
	2. Will cause significant delay or interruption to our service	<b>2</b>	<b>5</b>	<b>8</b>
	1. Will cause some problems but could be managed	<b>1</b>	<b>3</b>	<b>6</b>
		1. Unlikely but could happen	2. Likely to happen	3. Very likely or already happening
<b>likelihood</b>				

Initial scoring is without controls or mitigation.

Residual score reflects outcome after controls are in place and tested.

For new risks controls/mitigation is normally being put in place.

Residual scores should therefore still be high until these are fully in place and tested.