# Appendix E Strategic Risk Register September 2015 – Draft

The Strategic Risk Register reported to EMT and Cabinet only shows risks with a total score of 5 or more. (Risks scoring 4 or less are still on the Strategic Risk Register, but are not included in the report.) Proposed changes are shown as highlighted text.



South Cambridgeshire District Council

Risk Reference, Title, (date first included) and Description,	Risk Owner	Risk Score		Risk Owner's Comments	
plus associated Aims, Objectives	Risk Owner	Target	Current		
STR05 - Lack of land supply (June 2007) While there is good progress on the Cambridge fringe sites and at Cambourne, the downturn in the housing market and delay in bringing forward major sites (eg Northstowe) has led to slow down in rate of progress against trajectory. In addition, the Council has lost two planning appeals for sites at Waterbeach based on the lack of 5 year land supply, leading to the authority being unable to deliver its housing needs, resulting in the Council having to meet the shortfall in the short term from developments that are not in the submitted Local Plan.  Aims, Objectives: 11  Relevant PI(s): BV 106 - % new homes on brown field sites NI 154 - Net additional homes provided, NI 159 - Supply of ready to develop housing sites	Cllr Robert Turner Jo Mills	10	20	SCORES - IMPACT: 4; LIKELIHOOD: 5  CONTROL MEASURES / SOURCES OF ASSURANCE: A14 – Work is underway on 'interim measures' at Girton, a pinch point scheme. Funding package for the major scheme is progressing and six-month examination of the Development Consent Order for the scheme is now underway and must be completed by 13 November 2015. Work on site due to start 2016.  Northstowe Phase 1 planning application decision issued April 2014 with start on site commenced 2015. Northstowe Phase 2 Planning Application submitted in August 2014 and Committee resolved to grant approval in June and July 2015.  Planning Policy produce an Annual Monitoring Report (forecasts housebuilding levels) and the latest update shows an improved position.  Planning applications submitted for Wing (land north of Newmarket Road, Cambridge) and Cambourne West. Pre-application discussions continuing on NIAB 2. Construction for Cambourne 950 underway. Application for 199 homes granted consent at Barrington.  Local Plan public examination started November 2014. Memorandum of Understanding on Five Year Land Supply agreed with Cambridge City Council on 9 September 2014. Fortnightly list of 'significant cases' is updated and circulated to departmental management team, listing informal enquiries, pre-applications, planning applications and appeals received each week. The departmental management team oversees major cases, with enhanced consultation with local and lead members and County Council officers. Management of major applications benefits from Site Delivery Fund award of £50,000 over two years, and a new Business Excellence Manager appointed May 2015.  TIMESCALE TO PROGRESS:  Local Plan Hearings commenced on 4 November 2014.  Inspectors' letter received May 2015, timescale for further work presented to PFH on 9 July 2015 and response from the Inspector received 29 July.  Northstowe Phase 2 planning permission due to be issued by December 2015.	

Risk Reference, Title, (date first included) and Description,		Risk Score		Risk Owner's Comments	
plus associated Aims, Objectives	Risk Owner	Target	Current		
<ul> <li>STR08 - Medium Term Financial Strategy (MTFS) (June 2007)</li> <li>Risks concerning the financial projections include: <ul> <li>not achieving delivery of additional income / savings to meet targets, including from Business Improvement &amp; Efficiency and Commercialisation Programmes projects (and see STR26 below), shared services initiatives and the housing company;</li> <li>inflation exceeds assumptions;</li> <li>interest rates do not meet forecasts;</li> <li>employer's pension contributions increases exceed projections;</li> <li>changes in demand for some service areas could lead to pressures in the related budgets;</li> <li>unforeseen restructuring costs;</li> <li>retained business rates scheme – volatility of outstanding valuation appeals;</li> <li>major developments do not meet housing trajectory forecast;</li> <li>uncertainty re formula grant from 2016/17 on;</li> <li>cost of supporting development and meeting demand from growth;</li> <li>impact of welfare reform (and see STR15 below);</li> <li>availability of budget for Cabinet priorities;</li> <li>council tax strategy;</li> <li>national Government responds to the downturn in the economy by cutting local government expenditure faster than anticipated;</li> <li>material error in MTFS forecasts, leading to the Council needing to take action to cut its budgets, resulting in cuts in services, public dissatisfaction, audit and inspection criticism.</li> </ul> </li> <li>Aims, Objectives: 1, 2, 6, 10</li> </ul>	Cllr Simon Edwards Alex Colyer	10	20	CONTROL MEASURES / SOURCES OF ASSURANCE: Revised MTFS incorporates updated assumptions; approved by Cabinet in February 2015. Implement plans to deliver Council's programme in line with latest General Fund income and savings targets. Comparisons between MTFS, financial position statements and General Fund, HRA and Capital Programme estimates. Monitor inflation factors, effect of current economic climate on demand led services and budgets. Monithy financial report to Executive Management Team (EMT); EMT reviews progress in achieving budget targets. Treasury management reports to Finance & Staffing PFH. Monitoring of business rates income, collection rates and appeals. Monitoring of council taxbase to identify financial implications of growth. Additional income/savings targets built in to Business Improvement & Efficiency and Commercialisation Programmes projects, shared services and other initiatives. Reports to Cabinet on shared service opportunities in October 2014 (ICT, Legal and Waste) and November 2014 (Building Control). Autumn Statement and Local Government Finance Settlement: 2015/16 figures confirmed in February 2015.  TIMESCALE TO PROGRESS: Continue to explore opportunities for further savings beyond those in the MTFS. Commercialisation Programme being progressed. Review potential implications of the new Government's policy changes on RTB, social rents, and welfare reform. Autumn Statement and Local Government Finance Settlement, December 2015.  Relevant PI(s): SF 772 - The amount (£) of Overspend - General Fund SF 773 - The amount (£) of Overspend - Housing Revenue Account SF 707 - General Fund Budget Variation (%) SF 748 - HRA Budget Variation (%)	

Risk Reference, Title, (date first included) and Description,	D: 1 0	Risk S	Score	Risk Owner's Comments
plus associated Aims, Objectives	Risk Owner	Target	Current	
STR15 - Welfare Reform (December 2010) Radical changes to benefits, including localised council tax support scheme and introduction of a universal credit system, leading to possible:  • increased IT cost due to required system changes;  • implementation costs not fully reimbursed by Government grant;  • increased workload for Benefits and Homelessness teams, resulting in potential for:  • adverse effect on service provision due to the number of changes;  • increased dissatisfaction with the service due to reduced amounts of benefit payable;  • impact on Medium Term Financial Strategy;  • devastating effect on people with mental health problems; and  • dislocation of private sector housing market.  Aims, Objectives: 10  Relevant PI(s): BV 078a - HB/CTB claims days BV 078b - HB/CTB changes days NI 181 - Benefit claims process days BV 079b i - Recoverable overpayments % BV 079b ii - HB Overpayments recovered % BV 079b iii - Overpayments written off %	Cllr Simon Edwards Alex Colyer	10	16	CONTROL MEASURES / SOURCES OF ASSURANCE: Scoping work currently being undertaken by the Benefits Manager to assess the impact of the latest changes to welfare announced as part of the Summer 2015 budget. Amended Discretionary Housing Payments (DHP) policy for July 2015 Finance and Staff Portfolio Holder meeting; likely that a second revision of the policy will be required before start of the 2016/17 financial year.  Department for Work & Pensions (DWP) have confirmed increased DHP budget for 2016/17 following the announcement of the reduction in the level of the Benefit Cap (£20k).  Local Council Tax Support (LCTS) scoping being undertaken to work out impact of changes to Tax Credits in 2016, tax threshold changes and Living Wage on the level of estimated level of LCTS for 2016/17.  Welfare reform workshop for members will be held in September 2015 following some more detailed analysis of the impacts. Possible changes to LCTS may be required and if this is the case, modelling of revised schemes will be undertaken to consult with members, preceptors and public.  Monitoring of roll out of Universal Credit to ensure lessons learnt are implemented at SCDC.  Regular meetings with colleagues in housing advice and housing to assess impact of pay to stay proposals as well as the introduction of the £20k cap for those on out of work benefits.  TIMESCALE TO PROGRESS:  Remainder fraud requirement to be tied into the Enforcement and Inspection Review outcomes to ensure solution can be found. Looking at options for remainder fraud during summer 2015; implement temporary solution prior to final decision being made in autumn 2015.  DWP notified us of the intention to implement Universal Credit in February 2015 for single people. The DWP have indicated that the implementation date for Universal Credit within South Cambs is likely to be Autumn 2016.  There are around 120 people who could claim Universal Credit. Monitoring of cases which would be universal credit cases is being undertaken to assess the impact of the impending ch

Risk Reference, Title, (date first included) and Description,	Diele Commen	Risk S	Score	Risk Owner's Comments
plus associated Aims, Objectives	Risk Owner	Target	Current	
STR24 - HRA Business Plan (March 2012) The HRA Business Plan has its own associated risk register. Of the risks included, it is considered that only one needs to be included in the Strategic Risk Register: The Government decides to reopen the debt settlement, leading to increased debt requirement, resulting in reduced housing programme.  Aims, Objectives: 1, 2, 4, 5, 6, 9, 12	Cllr Mark Howell Stephen Hills	8	16	CONTROL MEASURES / SOURCES OF ASSURANCE: Capacity had been built into the Housing Revenue Account (HRA) business plan to absorb some future changes if they were required; however, the 1% rent cut announced in the Government's July 2015 Budget is the same as reopening the debt settlement - it takes £134m out of the HRA Business Plan and has a significant impact on the Council's build programme.  TIMESCALE TO PROGRESS: Possible consultation response to budget? Monitor progress of Budget through Parliament. Monitor Government policy including utilising our partnership arrangements with the Chartered Institute of Housing. Annual review of business plan, programme and resources; possible earlier report on Budget impacts to Cabinet or Council?
STR25 - Increase in numbers in Bed & Breakfast accommodation (January 2013) Potential impacts from current economic downturn and instability in the housing market and changes to the benefits system,  leading to not enough temporary accommodation available, leading to an increase in B&B use,  resulting in applicants not moved into permanent accommodation quickly enough and increased cost to the Council.  Aims, Objectives: 10, 12	Cllr Mark Howell Stephen Hills	9	16	SCORES - IMPACT: 4 (from 3); LIKELIHOOD: 4 (from 2)  CONTROL MEASURES / SOURCES OF ASSURANCE: Close working partnership with King Street Housing who provide private sector leasing options. Use of Rent Deposit Scheme, Empty Homes Initiative, other homelessness prevention measures and New Build Programme. Improved supply of temporary accommodation achieved during 2013/14 and 2014/15 helped to alleviate the pressure. New hostel opened in April 2015 with increased capacity.  TIMESCALE TO PROGRESS: The combined effects of the welfare benefit changes will now impact upon this. The authority needs to prepare for an increase in homeless applications with the potential risk of paying out £500k to £1m in Temporary Accommodation / B&B costs. Review of temporary accommodation portfolio now underway to rationalise the supply held.

Risk Reference, Title, (date first included) and Description,	Risk Owner	Risk Score		Risk Owner's Comments
plus associated Aims, Objectives	IXISK OWITEI	Target	Current	
STR28 – Recruitment & Retention (September 2015) Reduced staffing capacity due to difficulties in recruitment and retention, especially in some professions,  leading to loss of resources / experience / expertise in key services, increased workload and pressure on remaining staff to deliver services, increased sickness absence and stress, increased costs (including of repeat recruitment),  resulting in lack of capacity to meet service delivery needs, loss of effectiveness/productivity, disruption to, or lower quality of, services provided, either internally or to the public, failure to comply with statutory processes or meet statutory deadlines;	Cllr Simon Edwards Susan Gardner Craig	9	15	SCORES - IMPACT: 3; LIKELIHOOD: 5.  CONTROL MEASURES / SOURCES OF ASSURANCE: Variety of actions in place, appropriate to service areas, including: Internal development opportunities Secondments, both internally and with partnering authorities Shared services with partnering authorities Market supplements on a fixed term basis Use of temporary workers  TIMESCALE TO PROGRESS: Ongoing: Additional actions being considered in some service areas.
damage to the Council's reputation; legal challenge.  STR03 - Illegal Traveller encampments or developments (June 2007)  Failure to find required number of sites, or sites identified do not meet the needs of local Travellers, leading to illegal encampments or developments in the district, resulting in community tensions; cost and workload of enforcement action, including provision of alternative sites and/or housing; poor public perception and damage to reputation.  Aims, Objectives: 5	Cllr Robert Turner Jo Mills	9	9	SCORES - IMPACT: 3 (from 4); LIKELIHOOD: 3.  CONTROL MEASURES / SOURCES OF ASSURANCE: Ongoing routine monitoring of all district development. Government guidance issued, county wide needs assessment endorsed by PFH. Monthly report on position regarding temporary expiries and applications circulated to managers and key Members for coordination and oversight. Gypsy & Traveller planning policies included in draft Local Plan. In 2014 a total of 67 Gypsy and Traveller pitches gained permanent planning permission (three were granted on appeal). Between January and June 2015 five pitches were granted permanent planning permission on appeal at Smithy Fen, Cottenham, and temporary planning permission for 1 pitch was granted on appeal at Wimpole. There are four other pitches with temporary planning permission, which expire between 2015 and 2018. At June 2015 there was one pending application, and one outstanding planning appeal. The Affordable Homes departmental risk register includes delivering HCA funded projects, to ensure the supply of Gypsy & Traveller pitches and sufficient investment in existing pitches.  TIMESCALE TO PROGRESS: New applications – ongoing. Local Plan due for completion 2016. Gypsy & Traveller Area Needs Assessment to be updated, led by Housing Directorate.

Risk Reference, Title, (date first included) and Description,		Risk Score		Risk Owner's Comments	
plus associated Aims, Objectives	Risk Owner	Target	Current		
STR27 – Shared Services initiatives with other authorities (November 2014) Shared services initiatives are not completed in a timely fashion due to  • inadequate stakeholder engagement, • conflicting priorities, or • unavailability of key staff, leading to inadequate resources and support, resulting in a delay or failure in delivering the outputs, required additional income and savings targets, and associated benefits for the district's residents and businesses, including possible dilution in service levels initially.  Aims, Objectives: 2, 6, 8	Cllr Ray Manning Jean Hunter	9	9	SCORES - IMPACT: 3; LIKELIHOOD: 3.  CONTROL MEASURES / SOURCES OF ASSURANCE:  Progress to be overseen by a joint steering group including Leaders and relevant portfolio holders.  For SCDC, reports to Cabinet in October 2014 (re ICT, Legal and Waste) November 2014 (re Building Control) and July 2015 (re Building Control, ICT and Legal).  Strong programme and project management provided by an overall programme Shared Services Board comprising senior managers from each authority, supported by individual project boards of lead officers and relevant support services officers from each authority. Prioritisation of projects within workloads.  Dedicated external resources obtained for each projected, funded from Transformation Challenge Award grant.  A dedicated risk register is being drawn up for the Shared Services Board to monitor; progress will be reported through Corporate Plan monitoring.  TIMESCALE TO PROGRESS:  A Joint Committee to be established to oversee the delivery of shared services.  Dependent on the timeframe/milestones for each initiative – the proposed date for the shared arrangements to effectively go live is 1 October 2015.  Performance to be monitored monthly at Partnership Board for Shared Services and the Joint Committee for the first six months of the shared services.	
STR26 – Business Improvement & Efficiency, Development Control Improvement, and Commercialisation Programmes (November 2013) The Business Improvement Efficiency Programme (BIEP), Development Control Improvement Programme (DCIP) and Commercialisation Programme have their own associated risk registers. The risks included are summarised as follows:  The Projects on the programmes are not completed in a timely fashion due to  inadequate stakeholder engagement,  conflicting operational, programme and project priorities, or  long term unavailability of relevant and crucial staff, leading to inadequate programme and project resources and support, resulting in a delay or failure to deliver the outputs, associated benefits, and required income and savings targets.  Aims, Objectives: 2, 7	Cllr Simon Edwards Alex Colyer	9	9	SCORES, IMPACT: 3; LIKELIHOOD: 3  CONTROL MEASURES / SOURCES OF ASSURANCE:  The Programme Manager identified programme and project resource requirements before the start of the tranches. The level of resource required is continually monitored by the Programme Manager as projects progress, close and new ones commence. The Senior Responsible Officer is responsible for securing the required resources. Regular 1:1s with Executive Director.  Monthly Highlight Reports from each Project Manager to the Programme Manager. Monthly Highlight Reports to EMT from the Programme Manager.  Regular update meetings with Project Managers & Project Sponsors used to assess required resource levels.  A Stakeholder Engagement Strategy and detailed stakeholder analysis has been developed. Stakeholder engagement activities place regularly throughout the programme.  TIMESCALE TO PROGRESS: Throughout 2012-2017.	

Risk Reference, Title, (date first included) and Description,	Risk Owner	Risk S	core	Risk Owner's Comments	
plus associated Aims, Objectives	RISK OWITEI	Target	Current		
STR20 – Partnership working with Cambridgeshire County Council (September 2011) The failure of partnership arrangements (e.g. health & wellbeing, economic development, transport, City Deal) with the County Council, leading to the needs of district residents and businesses not being adequately met or reflected in County Council resource allocation decisions, resulting in adverse effects on the district's residents and businesses.	Cllr Ray Manning Jean Hunter	9	9	SCORES - IMPACT: 3; LIKELIHOOD: 3.  CONTROL MEASURES / SOURCES OF ASSURANCE: Active engagement of officers and Members in partnerships, to ensure the district's residents' and businesses' needs are articulated.  TIMESCALE TO PROGRESS: Progress being monitored via Corporate Plan. Dependent on the timeframe/milestones for each partnership.	
Aims, Objectives: 3, 6, 8, 11  STR19 - Demands on services from an ageing population (September 2011)  The district's demography changes, with significant growth in the over 65 year old population, leading to additional demands on health and social care services, including to the Council's sheltered housing and benefits services, resulting in adverse impact on service standards; increased customer dissatisfaction with services; increased levels of social isolation.  Aims, Objectives: 1, 4, 5, 9	Cllr Mick Martin Mike Hill	9	9	SCORES - IMPACT: 3; LIKELIHOOD: 3.  CONTROL MEASURES / SOURCES OF ASSURANCE: Following "Ageing Well" workshops, Cabinet agreed an "Ageing Well" plan in July 2014 following a Joint Portfolio Holder Task & Finish Group. SCDC is also engaged with the CCG Older People's Service procurement. Contract awarded to Uniting Care Partnership.  TIMESCALE TO PROGRESS: Ageing Well implementation plan under development March – September 2015 to deliver Cabinet-agreed Ageing Well Plan. SCDC Housing staff contributing to CEPB projects including Data Sharing, 7-Day Working, Person-Centre System, and Ageing Healthily & Prevention. SCDC Housing leading on development of sub-regional Older People's Housing Strategy and refresh of County Older People Strategy. Take account of demographic change in the corporate and financial planning cycle. Redesign services to address demands.	

Risk Reference, Title, (date first included) and Description,	Risk Owner	Risk S	Score	Risk Owner's Comments
plus associated Aims, Objectives	RISK OWITE	Target	Current	
STR22 - Safeguarding the Council's services against climate change (March 2012) The Council fails to develop measures to safeguard its services against climate change, leading to unacceptable vulnerability to the impact of climate shifts and other weather-related events, resulting in a degradation or breakdown of service delivery and damage to property, increasing costs and impact on the Council's reputation.  Aims, Objectives: 4	Cllr Ray Manning Mike Hill	8	8	SCORES - IMPACT: 4; LIKELIHOOD: 2.  CONTROL MEASURES / SOURCES OF ASSURANCE: Effective drainage plans required for planning consents. A range of Climate Change related policies have been included in the Submission Local Plan. Response to Flood Events reviewed by EMT in October 2014.  TIMESCALE TO PROGRESS: SCDC Service Business Continuity Plans to be reviewed by September 2015.
STR02 – Equalities (June 2007) The Council is successfully challenged over not complying with general equalities legislation or legislation specific to public and local authority bodies, leading to decisions relating to service delivery being overturned and possible Commission for Human Rights and Equalities inspection, resulting in delays to the implementation of new service proposals causing detriment to customer service, preventing the timely delivery of policy and financial objectives, reduction in reserves available to support balanced MTFS, adverse publicity and effect on reputation.  Aims, Objectives: 2	Clir Mark Howell Alex Colyer	8	8	SCORES - IMPACT: 4; LIKELIHOOD: 2.  CONTROL MEASURES / SOURCES OF ASSURANCE: The Council has met its legal requirements to publish equality information and equality objectives on an annual basis. This information is incorporated into a revised draft Equality Scheme 2015-2020, which is currently subject to public consultation. The Council has embedded equality monitoring arrangements whereby new and revised policies and service delivery proposals are subject to screening for their likely equality implications. Where appropriate, timescales are agreed for full subsequent assessment prior to adoption of the new proposals, or as part of implementation, monitoring and review arangements. EMT designed Stephen Hills, Director of Housing, to lead a self-assessment against the 'Excellent' standard of the government's equality framework in 2013. The assessment found evidence of broad compliance across the council's activities. The development and improvement areas identified will be incorporated in normal business activity through the draft Equality Scheme 2015-2020. EMT approved the Annual Equality Report 2014 on 10 December 2014.  TIMESCALE TO PROGRESS: Following consultation, we anticipate submitting a final draft Equality Scheme to the lead Portfolio Holder (Cllr Mark Howell) in October 2015. In the meantime, work on the 2015-17 priorities and commitments identified in the scheme is underway.

Red / Amber / Green shading in the Actual Column indicates the following movement in risk scores:

	Red	Amber	Green
for risks previously above the line:	the score has increased	the score has not changed, or has decreased but stays above the line	the score has decreased to below the line
for risks previously below the line:	the score has increased to above the line	the score has increased but stays below the line	the score has not changed, or has decreased

#### Notes

- 1. The "Reference" is unique and retained by the risk throughout the period of its inclusion in the risk register.
- Risks are cross referenced to the relevant 2015/16 Aims and Objectives adopted by Council on 26 February 2015.
- 3. Criteria and guidelines for assessing 'Impact' and 'Likelihood' are shown below.
- 4. The "Actual" risk score is obtained by multiplying the Impact score by the Likelihood score.
- 5. The dotted line (- - - -) shows the Council's risk tolerance line.
- 6. The "Timescale to progress" is the date by which it is planned that the risk will be mitigated to below the line.

<u>Impact</u>	Likelihood
5 Extreme	5 Almost certain
4 High	4 Likely
3 Medium	3 Possible
2 Low	2 Unlikely
1 Insignificant	1 Rare
-	

#### **Direction of Travel**

Priority reduced from last review (give the previous Total score in the brackets)

Priority equal to last review

Priority increased from last review (give the previous Total score in the brackets)

ew Risk included in the risk register for the first time

## Impact Giving rise to one or more of the following:

	Service disruption	People	Financial loss *	Environment	Statutory service/ legal obligations	Management	Reputation	Score
Extreme	Serious disruption to services (loss of services for more than 7 days)	Loss of life	Financial loss over £500k	Major regional / national environmental damage	Central government intervention; or     Multiple civil or criminal suits	Could lead to resignation of Leader or Chief Executive	Extensive adverse coverage in national press and/or television	5
High	Major disruption to services (loss of services for up to 7 days)	Extensive multiple injuries	Financial loss between £251k - £500k	Major local environmental damage	Strong regulatory sanctions; or     Litigation	Could lead to resignation of Member or Executive Director	Adverse coverage in national press and/or television	4
Medium	Noticeable disruption to services (loss of services for up to 48 hours)	Serious injury (medical treatment required)	Financial loss between £51k - £250k	Moderate environmental damage	Regulatory sanctions, interventions, public interest reports; or     Litigation	Disciplinary / capability procedures invoked	Extensive adverse front page local press coverage	3
Low	Some disruption to internal services; no impact on customers	Minor injury (first aid)	Financial loss of between £6k - £50k	Minor environmental damage	Minor regulatory consequences; or     Litigation	Formal HR procedure invoked	Some local press coverage; or, adverse internal comment	2
Insignificant	Insignificant disruption to internal services; no impact on customers	No injuries	Financial loss of up to £5k	Insignificant environmental damage	No regulatory consequences; or     Litigation	Informal HR procedure invoked	No reputational damage	1

<sup>\*</sup> including claim or fine

### Likelihood

	Guidelines	Score
Almost certain	Is expected to occur in most circumstances (more than 90%), or     Could happen in the next year, or     More than 90% likely to occur in the next 12 months	5
Likely	Will probably occur at some time, or in some circumstances (66% - 90%), or     Could happen in the next 2 years, or     66% to 90% likely to occur in the next 12 months	4
Possible	<ul> <li>Fairly likely to occur at some time, or in some circumstances (36% - 65%), or</li> <li>Could happen in the next 3 years, or</li> <li>36% to 65% likely to occur in the next 12 months</li> </ul>	3
Unlikely	Is unlikely to occur, but could, at some time (11% - 35%), or     Could happen in the next 10 years, or     11% to 35% likely to occur in the next 12 months	2
Rare	May only occur in exceptional circumstances (up to 10%), or     Unlikely to happen in the next 10 years, or     Up to 10% likely to occur in the next 12 months	1