

Internal Audit Report



Appendix A

Planning – Decision Notice Process

Customer:	South Cambridgeshire District Council
Assurance rating:	Limited
Organisational impact:	Major
Corporate priorities:	Growing local businesses and economies

Actions	Number
Critical	2
High	1
Medium	
Low	
Total	3

Audit completed by	
Jonathan Tully	Head of Internal Audit
26 November 2020	Greater Cambridge Shared Audit

Report status	Final
Report to Committee	Yes - the committee will receive a specific update

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Executive Report

Introduction

New buildings, or major changes to existing buildings and the local environment, need consent which is known as planning permission.

South Cambridgeshire District Council is a Local Planning Authority and is responsible for issuing planning permission within the district. Planning is delivered by [The Greater Cambridge Shared Planning service](#) and they can issue in the region of 5,000 decisions per year, some of which are delegated to Officers and others which are reviewed by the Planning Committee. The Planning Service implemented a new computer system in February 2020 and has been working remotely during the Coronavirus pandemic.

There are two teams with key roles involved in issuing planning permission. Case Officers are responsible for processing the Planning Applications (liaising with applicants, undertaking site visits, making recommendations and making a decision); and Technical Support Officers are responsible for processing, checking, and issuing Decision Notices. Technical Support Office also undertake a wider variety of work that supports the Planning Service.

Scope & Objectives

Background

This review has been completed in response to two recent planning permission incidents, where a Decision Notice was issued in error. One mistake led to planning permission for an extension and annexe in Steeple Morden before a consultation was completed, and the second resulted in a planning permission being issued in Great Abington without the accompanying conditions.

The Council issued a public apology on its website on the 17th November 2020: <https://www.scamb.gov.uk/council-apology-and-investigation-following-two-planning-errors/>

Objectives

Our objective was to review the planning applications and the decision-making process. We considered:

- what has happened?
- what was the root cause and did the Council comply with existing procedures?
- what were the other contributing factors?
- what are the opportunities for improvement?

We did not review the planning applications themselves, and whether it was compliant with planning policy, as there are already existing processes for reviewing, appealing or challenging planning applications.

To complete our review we considered procedure notes, discussed the events with officers, and reviewed system records. Documents associated with the planning application are loaded onto the publicly accessible online Planning Portal:

<https://applications.greatercambridgeplanning.org/online-applications/>

Key risks

We consider the risks related to review as part of our planning process. The key risks that we identified were non-compliance with policy and procedure, leading to reputational risk and the unplanned consumption of resources and expenditure to rectify errors.

Professional Standards

The audit was conducted in accordance with the principles contained in the Public Sector Internal Audit Standards (PSIAS) and the Local Government Application Note (LGAN).

Summary of Findings

We reviewed both cases and agree with the Council that both Decision Notices has been issued incorrectly. The Councils Legal Team will launch proceedings in the High Court to overturn the decisions. Judicial Reviews are the most expedient route to rescind planning applications that have been wrongly issued by a Council.

We reviewed the system records and supporting information to understand what went wrong. Both cases were the result of human error, and there is clear supporting information that shows the Council intended to process these correctly.

Both errors could have been prevented if the Decision Notices were reviewed for accuracy before being issued. The Council has procedures, and separation of duties, which provides an element of checking prior to completion. However, these two incidents demonstrate that the controls were ineffective.

There are multiple factors which have contributed to the procedures not working, including rarity of events, inexperience of using new systems, employees having to work remotely, pressures from backlog of work, plus historic processes which could benefit from review. These are explored in more detail later in this report.

The Council quickly responded to both incidents and contacted the customers to apologise. It has also taken immediate remedial steps and updated procedures to help prevent this happening again.

Both cases need to be seen in the context of the current environment. While the Council would not want to make any mistakes, it is not surprising that mistakes may occur as the Council adapts to working remotely during the pandemic. Both cases are good examples of how a series of multiple small errors can escalate into a significant event. The types of error were unusual and unlikely to reoccur under normal circumstances. However, the Council should still consider the contributing factors as they could lead to different but similar risks materialising in the future.

The Planning process is transparent, and therefore also subject to scrutiny. Consequently, there is significant reputational risk from error, in addition to the costs to all parties involved from delaying decisions. Processes can be reviewed further to help mitigate these risks, and the main consideration should be whether Case Officers should have a final review of Decision Notices before they are issued. This would introduce an additional processing cost to the Council, but the Council should recognise that this could be offset by preventing the cost of future errors.

We have documented opportunities for improvement in this report, plus we have developed an action plan which management will commit to implementing.

Our Conclusion

A '**Limited**' rating has been given based on the processes and controls examined at the time of the review.

The Council has policies and procedures in place for planning applications and processes a significant amount of applications each year. However, these two recent incidents demonstrate that the internal control system, while generally effective, cannot prevent all risks from materialising, and errors can have a major impact on the Council.

There is scope to improve the design of the control framework in order to increase both efficiency and effectiveness. The Planning Service have already taken positive steps to improve their internal controls. We will complete a follow-up review to test the effectiveness of the controls that have been implemented, and this should be able to provide further assurance.

Acknowledgement

We would like to thank everyone consulted for their time and assistance in conducting the review.

Jonathan Tully | Head of Shared Internal Audit

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Detailed Findings

Steeple Morden

Overview of what happened

A planning application (S/4541/19/FL) for a property in Steeple Morden was received on 24th December 2019.

The application was for an erection of two storey rear extension, ground floor front extension and an annex in the south west corner of the rear garden.

The application was granted permission on 5th May 2020. Subsequently the Council identified errors in the supporting documents that were referenced in the Decision, and proactively decided to quash the decision via the High Court. This effectively made this decision null and void, and provided for the planning applications reconsideration.

Following the Judicial Review, the Council updated the file records on the planning system so that the process could start again. This included re-consultation of neighbours and clarification of the application documentation. The status of the application was not updated correctly on the electronic planning records, that are used to manage applications, which resulted in the Council issuing a second planning permission in error on 13th November 2020. This was at the start of the process, before the further consultation has been concluded or the newly assigned Case Officer had visited the site.

Impact and next steps

The second Decision Notice authorised development to be carried out in accordance with plans, but there were no plans referenced in the Decision Notice. Consequently, there is no precision about the nature of the development granted.

The Council has decided to proceed with a second Judicial Review in order to enable the application to be reconsidered and for the proper processes to conclude.

Root cause and compliance with existing procedure

The Council has policies and procedures for processing planning decisions, and how records are input onto the Planning System. The Council use automated workflow processes to drive efficiency and improve customer service, based on the data entered.

Managing a planning application, following a Judicial Review, is not a common event. There was no existing procedure note for managing the “returned” application and the subsequent consultation. There are two data fields that needed to be updated on the system, but only one of the data fields was updated. Consequently, the application was processed through an automated workflow which instructed Technical Support Officers to issue it as an approved delegated decision.

The automated decision was not challenged, and the planning permission was issued in error. At the time of the issue of the decision notice, the Planning Officer for the Council had already booked an appointment for a future site inspection and was in the process of issuing correspondence to the applicant and stakeholders for consultation. This illustrates that the decision was an administrative error, as it was not consistent with the other work in progress.

Contributing factors

Factor	Detail
Frequency of event	<p>Processing an application which has been through a judicial review is not a common event. This was not a typical planning application.</p> <p>The Planning Service implemented a new system in February 2020, which included a new automated workflow process.</p> <p>The system is designed to be flexible and configured locally according to the needs of the Planning Service. Since implementing the system, the Service has been developing customised screen alerts to help guide users and warn them when their actions could result in an error. There is not a standard process built into the system for this type of event, and they had not yet anticipated a need to create this alert.</p> <p>The Technical Support Team did not have a procedure note to follow, in this event, and Planning Officers did not expect that the planning decision would be issued by the workflows based on the actions completed in the system.</p>
Accountability	<p>When processing Planning Applications the work is delivered by Case Officers and Technical Support Officers. These roles are based in different teams, reflecting the nature of their work.</p> <p>A simple overview, in the context of these incidents, is that the Case Officers are responsible for processing the Planning Applications (liaising with applicants, undertaking site visits, making recommendations and making a decision); and Technical Support Officers are responsible for processing, checking and issuing Decision Notices.</p> <p>Case Officers are not responsible for checking planning decisions before they are finally issued. This approach is thought to be based on historic processes where planning applications consisted of manual paper files, and it was efficient for the Technical Support Officers to issue files without referring them back to the Case Officers. Technical Support Officers provide a reasonableness check, but they will only be able to consider the information in front of them before issuing a Decision Notice. There was nothing that indicated this application should be handled differently.</p> <p>Our review of records and the system illustrates that multiple Case Officers, and Technical Support Officers, were involved in processing this application. This provides assurance that the application is being processed legitimately due to the separation of duties. However, a single accountable officer, with knowledge of all the case history, could have noticed the potential error and prevented it from occurring.</p> <p>In this instance the error would have been prevented if it was referred back to the Case Officer before being issued.</p>

<p>Environment</p>	<p>The Council is currently working remotely due to the Coronavirus pandemic. This means that Officers are working from home, rather than together in the office. While there is enabling technology, there is still a challenge to adapt to working in this new environment.</p> <p>Due to both the size of the team, and the remote working, Case Officers may not be aware of which Technical Support Officers are on duty and vice versa. Consequently, they are less likely to effectively communicate the status of complex cases and potential risks. The Officers interviewed explained that they would be more likely to work collaboratively and communicate potential issues, if they were physically sat next to each other. Culturally it may also feel easier to communicate when physically working together, in comparison to initiating an electronic communication. There are tools in place, but it may take time for these to be fully embedded in the same way. Also, alerts and messages sent via email and messaging boards may not be read instantly and cannot be guaranteed to be effective in a fast-paced environment. The Council needs to adapt to working in an agile way as this may continue to be the new way of working for the foreseeable future.</p> <p>In this instance the error could have been prevented if the Technical Support Officers were aware of the case history.</p>
<p>Volume of work</p>	<p>The Planning Service implemented a new system in February 2020, and this created a backlog of work. A certain amount of disruption is anticipated during a system implementation. The Coronavirus pandemic has created further disruption, and the Teams ability to recover from the backlog.</p> <p>The Planning Service has been working hard to recover from the backlog, however increasing the pace carries the risk that there is less time available for checking applications in as much detail before issue. The workflows that are being implemented can help to manage this risk of error for routine procedures, but this application was not a routine procedure.</p> <p>The Teams are also having to process applications that were started on the previous computer system and migrated to the new system. This does introduce another level of complexity which can result in work taking longer. This should resolve itself as time progresses and all applications are started on the current system.</p>

Opportunities for improvement

Consideration	Detail
On Screen Alerts	<p>The Council has already implemented a workaround to reduce the risk of this happening again. The correct procedure requires two data fields to be updated. The system has now been configured to display an on-screen alert that warns the user if they have not completed this step correctly. This is good practice as it alerts users to follow the correct steps for a process which happens rarely.</p>
Priority Notice	<p>It is possible to add case notes to an application on the system. They can be marked as a “Priority” item which means it would be displayed whenever a user views the application or processes a linked document.</p> <p>Part of the processing error was that the Technical Support Officers were not aware that this was a unique application that shouldn’t be processed normally, and this could have alerted them to that. This would have prompted the Technical Support Officers to challenge and check with the Case Officers first.</p> <p>The Planning Service should consider using the “Priority” flag for high risk applications.</p>
Procedure notes	<p>The Council has already revised their procedure notes to document how a Planning Application that has been through a Judicial Review should be handled on the system. This should help to prevent the risk in future.</p>
Culture	<p>The Council will continue to work remotely during the Coronavirus pandemic and working practices could possibly not return to normal for the foreseeable future. It would be helpful to reinforce the message that Technical Support Officers can challenge and ask Case Officers if they are unsure of any aspect of a document.</p>
Process review	<p>There would be some value in undertaking a detailed process review for the authorisation and issue of decisions. Historical processes which were designed to be efficient may no longer be as relevant in a digital and agile working environment.</p> <p>Applications could be referred back to the Case Officers for final approval before they are issued. Adding an additional check would reduce the risk of issuing an incorrect document where the Technical Support Officer does not have the case knowledge. This process is in place at other Councils.</p> <p>However, this would introduce a transactional cost, and there may be other smarter options to consider. For example, it might be possible to flag applications based on their type or specific case history. High risk cases could be referred back to Case Officers and lower risk cases could continue to be checked and issued by Technical Support Officers. This could enable both accountability and also maintain existing efficiencies.</p> <p>It would also be sensible, over the longer term, to consider a review of role and security profiles. For example, in this scenario, if the data field could only be updated by a System Administrator, this would have been processed by someone with a more detailed knowledge of how the different parts of the system behave. That might have reduced the likelihood of the error occurring.</p>

Strawberry Farm

Overview of what happened

A planning application (S/3387/19/RM) for land rear of Strawberry Farm in Great Abington was received on 27th September 2019.

The application was for approval of matters reserved for appearance landscaping layout & scale following outline planning permission S/1433/16/OL for residential development comprising 8 dwellings including affordable housing provision landscaping and associated infrastructure.

The [Planning Committee](#) approved the application, subject to the Conditions and Informative set out in the report from the Joint Director of Planning and Economic Development on 11th November 2020. There were seven Conditions, which were clearly set out in the [report to the Committee](#) and approved.

The [Decision Notice](#) was issued on the Planning System on 12th November 2020. None of the Conditions were included in the decision notice.

Impact and next steps

The planning permission authorised development to be carried out in accordance with the Conditions, but there were no Conditions referenced in the Decision Notice.

The Council has decided to proceed with a Judicial Review so that a Decision Notice can be issued with the conditions included.

Root cause and compliance with existing procedure

The Council has policies and procedures for processing planning decisions, and how these details are input onto the Planning System.

Conditions are entered into a “Recommended” part of the planning system, and then entered into the “Decision” part of the planning system.

Where an application is delegated these are automatically copied into the “Decision” part of the planning system, and this is used to populate the Decision Notice.

Where an application is presented to a Committee these are not automatically copied into the “Decision” part of the planning system. Conditions have to be manually entered before the Decision Notice is issued. This process is carried out by a Senior Planning Officer and reflects the fact that the decision of the committee, including the details of planning conditions can change during the course of a Committee meeting. It also helps to mitigate the risk that a Decision Notice is issued with recommended Conditions, as opposed to what was amended and approved at a Committee meeting.

In this instance the Conditions were not added to second “Decision” screen and consequently were omitted from the final Decision Notice. The absence of any planning conditions on the decision notice was not challenged by the Technical Support Team, and the permission was issued in error.

The Council had already published the Conditions as part of their Committee report which is published on the website. This illustrates that the decision was an administrative error, as it was not consistent with the other work in progress.

Contributing factors

Factor	Detail
Adapting to new ways of working	<p>The Planning Service implemented a new system in February 2020, and this involved the consolidation of two different systems.</p> <p>Planning Applications considered by Committee are processed differently to those which are delegated decisions. For example, some processes are automated, and some are manual. Local practices for managing these has varied historically, on when conditions are added into the system, and post implementation work on unifying and training officers on the single approach has not yet been fully embedded. The Case Officers are still adapting to new ways of working and the likelihood of the error repeating should be reduced over time with experience.</p>
Environment	<p>The Council is currently working remotely due to the Coronavirus pandemic. This means that Officers are working from home, rather than together in the office. While there is enabling technology, there is still a challenge to adapt to working in this new environment.</p> <p>Due to both the size of the team, and the remote working, Case Officers may not be aware of which Technical Support Officers are on duty and vice versa. Consequently, they are less likely to effectively communicate the status of complex cases and potential risks or seek help. The Officers interviewed explained that they would be more likely to work collaboratively and communicate potential issues, if they were physically sat next to each other. Culturally it may also feel easier to communicate when physically working together, in comparison to initiating an electronic communication. There are tools in place, but it may take time for these to be fully embedded in the same way. Also, alerts and messages sent via email and messaging boards may not be read instantly and cannot be guaranteed to be effective in a fast-paced environment. The Council needs to adapt to working in an agile way as this may continue to be the new way of working for the foreseeable future.</p>
Volume of work	<p>The Planning Service implemented a new system in February 2020, and this created a backlog of work. A certain amount of disruption is anticipated during a system implementation. The Coronavirus pandemic has created further disruption, and the Teams ability to recover from the backlog.</p> <p>The Planning Service has been working hard to recover from the backlog, however this can potentially be at the expense of detailed checking of applications before issue. The workflows in place can help to manage this risk of error for routine procedures, but the training planned and delivered has been challenging to embed amongst all officers due to workload and remote working.</p>

Opportunities for improvement

Consideration	Detail
On Screen Alerts	<p>The Council has already implemented a workaround to reduce the risk of this happening again.</p> <p>The system has now been configured to display an on-screen alert that reminds the approving Officer that they need to add the Conditions agreed by the Committee, before it is put into the workflow for processing by the Technical Support Team.</p>
Refresher training	<p>The Council has already arranged for refresher training with the Officers involved in the process.</p> <p>The Planning Service implemented a new system in February 2020, and this involved the consolidation of two different systems. It would still be good practice to issue a reminder to all staff involved in processing decisions on the current standardised process and to check that Conditions have been included.</p>
Culture	<p>The Council will continue to work remotely during the Coronavirus pandemic and working practices may not return to normal for the foreseeable future.</p> <p>The Technical Support Officers are a second line of defence and play a vital role in checking and resolving decisions before they are issued. It may be beneficial to log consistent error types that they correct as part of their role. Feeding back consistent errors to the Case Officers could help save time for the Technical Support Officers overall. Errors may change as a result of the teams working remotely.</p> <p>If there are any trends, they should communicate these to Case Officers and Team Leaders. Officers in the Planning Service have also considered setting up “Change Champions” within teams, and this would be helpful for coaching, sharing system updates, plus seeking feedback for improvements in the system.</p> <p>Issuing a Decision Notice without conditions is not common practice and would look unusual. It would be helpful to reinforce the message that Technical Support Officers can challenge and ask Case Officers if they are unsure of any aspect of a document.</p>

<p>Process review</p>	<p>There would be some value in undertaking a detailed process review for the authorisation and issue of decisions. Historical processes which were designed to be efficient may no longer be as relevant in a digital and agile working environment.</p> <p>Applications could be referred back to the Case Officers for final approval before they are issued. Adding an additional check would reduce the risk of issuing an incorrect document where the Technical Support Officer does not have the case knowledge. This process is in place at other Councils.</p> <p>However, this would introduce a transactional cost, and there may be other smarter options to consider. For example, it might be possible to flag applications based on their type or specific case history. High risk cases could be referred back to Case Officers and lower risk cases could continue to be checked and issued by Technical Support Officers. This could enable both accountability and also maintain existing efficiencies.</p>
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Management Agreed Actions

As part of the review we have identified opportunities for improvement, which have been shared with Management. These are developed into actions to improve the effectiveness of the governance, risk management arrangements, and the internal control environment.

Management are responsible for implementing their actions and providing assurance when they are completed. Timescales for implementing actions should be proportionate and achievable to the available resources. To help prioritise the actions we have produced guidance below:

Priority	Description	Timescale for action	Monitoring
Critical	Extreme control weakness that jeopardises the complete operation of the service.	To be implemented immediately.	Within 1 month
High	Fundamental control weakness which significantly increases the risk / scope for error, fraud, or loss of efficiency.	To be implemented as a matter of priority.	Within 6 months
Medium	Significant control weakness which reduces the effectiveness of procedures designed to protect assets and revenue of the Authority.	To be implemented at the first opportunity.	Within 12 months
Low	Control weakness, which, if corrected, will enhance control procedures that are already relatively robust.	To be implemented as soon as reasonably practical.	Within 24 months

The Council has a Risk Management system, which is used for tracking their progress. This will be updated upon distribution of this report and we will follow up the actions where appropriate.

1 Configuration of On-Screen Alerts

Observation:

The Planning Service processes a high volume of transactions, some of which are routine and some of which are complex.

The Service has been writing On-Screen Alerts as part of the new system implementation. These warn users of errors and guides them to follow correct procedures.

They do need to be used with caution to maintain their effectiveness, as users will start to ignore them if there are too many.

Risks and opportunities:

Processing errors can result in “Decision” errors, leading to reputational risk and additional cost to the organisation.

Building in system alerts could help to reduce the likelihood of system errors occurring.

Action Required:

The Planning Service should configure On-Screen Alerts, that reflect these two incidents, to warn users and reduce the likelihood of them making errors.

Update: This has been implemented during the review.

Action Owner:

Technical Support Manager

Implementation by:

Already implemented

Action Priority:

Critical

2 Explore use of Case Notes “priority” flag

Observation:

A common challenge, which is even more difficult whilst working remotely, is ensuring all potential officers involved in an application are aware of the details of a high-risk and complex case.

The system has case notes which are displayed to all users accessing the planning file when the “Priority” field is flagged.

Risks and opportunities:

Utilising the priority field for complex applications could help planning officers be aware of a high-risk application. This may be more effective than relying on communicating via email and other messaging systems which may not be reviewed promptly.

Action Required:

Officers should consider whether the flagging the “Priority” field in the case notes could be rolled out as standard practice for high risk and complex planning cases.

Action Owner:

Delivery Team Manager

Implementation by:

30/11/2020

Action Priority:

Critical

Observation:

The Planning Service has recently migrated data, from two different Councils using separate and different planning systems, onto a single consolidated system. This has potential to introduce efficiencies by standardising processes.

This review has highlighted a need to review existing processes, specifically within the Decision Issuing Process.

Procedure notes have been developed on the new system, and are updated as required, in addition to existing notes stored on Word documents outside of the system.

The Team has been managing the backlog of work which has restricted the Planning Services ability to drive and implement change. A Business Analyst is joining the Technical Support team which will help with process reviews.

Risks and opportunities:

Standardising processes will help to reduce risk of errors and help drive efficiencies. A central repository of procedure notes stored on the system will help ensure that Officers follow the latest processes.

Action Required:

There should be a business process review of authorising applications to issuing decision's within both the Planning Officers team and the Technical Support team.

These should be documented in procedure notes, preferably stored in a single place, and communicated to all planning staff for consistency.

Action Owner:

Technical Support Manager

Implementation by:

31/01/2021

Action Priority:

High

Distribution list

Name	Title
Liz Watts	Chief Executive
Stephen Kelly	Joint Director of Planning and Economic Development
Sharon Brown	Assistant Director Delivery
Rory McKenna	Monitoring Officer
Peter Maddock	S151 Officer and Head of Finance
Bridget Smith	Leader of the Council
Cabinet	
Members of the Planning Committee	
External Audit	

This Internal Audit report is confidential within the service it relates to, and the information contained within it should not be disclosed to third parties without the consent of the appropriate Head of Service or the Head of Internal Audit.

Summary information will be shared with committees and boards that have responsibility for monitoring the governance risk and control arrangements for the Council.

Glossary of terms

Assurance ratings

Internal Audit provides management and Members with a statement of assurance on each area audited. This is also used by the Head of Shared Internal Audit to form an overall opinion on the control environment operating across the Council, including risk management, control and governance, and this informs the Annual Governance Statement (AGS).

Term	Description
Full Assurance	Controls are in place to ensure the achievement of service objectives and good corporate governance, and to protect the Authority against significant foreseeable risks.
Reasonable Assurance	Controls exist to enable the achievement of service objectives and good corporate governance, and mitigate against significant foreseeable risks. However, occasional instances of failure to comply with control process were identified and/or opportunities still exist to mitigate further against potential risks.
Limited Assurance	Controls are in place and to varying degrees are complied with, however, there are gaps in the process which leave the service exposed to risks. Therefore, there is a need to introduce additional controls and/or improve compliance with existing ones, to reduce the risk exposure for the Authority.
No Assurance	Controls are considered to be insufficient, with the absence of at least one critical control mechanism. There is also a need to improve compliance with existing controls, and errors and omissions have been detected. Failure to improve controls leaves the Authority exposed to significant risk, which could lead to major financial loss, embarrassment, or failure to achieve key service objectives.

Organisational impact

The overall impact may be reported to help provide some context to the level of residual risk. For example, if no controls have been implemented in a system it would have no assurance, but this may be immaterial to the organisation. Equally a system may be operating effectively and have full assurance, but if a risk materialised it may have a major impact to the organisation.

Term	Description
Major	The risks associated with the system are significant. If the risk materialises it would have a major impact upon the organisation.
Moderate	The risks associated with the system are medium. If the risk materialises it would have a moderate impact upon the organisation.
Minor	The risks associated with the system are low. If the risks materialises it would have a minor impact on the organisation.