LANCASTER CITY COUNCIL

Promoting City, Coast & Countryside

Risk Management Policy and Procedure

March 2023

Lancaster City Council
Risk Management Policy V1.2
22nd March 2023

Contents

1.0 Introduction 3
2.0 Scope 3
3.0 Risk Management Objectives 3
4.0 Benefits 4
5.0 Definitions 4
6.0 Risk Management Standards 5
7.0 Risk Management Approach 5
8.0 Risk Appetite 8
9.0 Risk Registers 8
10.0 Roles and Responsibilities 9
11.0 Embedding Risk Management 10
12.0 Culture 11
13.0 Training and Awareness 11
14.0 Summary 11
Appendix 1 - Check List for Risk Identification (PERFORMACE) 12
Appendix 2 – Measures of Likelihood and Impact 14
Appendix 3 - Risk Response Categories 16

Version control

	Description	Date
V0.1	Draft submitted to Executive Team for comments	13 November 2019
V0.2	Draft submitted to Audit Committee	27 November 2019
V1.0	Approved by Audit Committee	27 November 2019
V1.1	Draft submitted to Audit Committee	24 March 2021
V1.2	Revisions submitted to the Senior Leadership Team for comments	18 January 2023
V1.2	Draft submitted to Audit Committee	March 2023
V1.2	Approved by Audit Committee	22 March 2023

Due for review every 2 years.

1.0 Introduction

1.1 Risk is unavoidable and is part of all our lives. As an organisation, we need to take risks to grow and develop. Risk management involves understanding, analysing and addressing risks to make sure the organisation achieves its objectives. Successful risk management can make a council more flexible and responsive to new pressures and external demands. It allows an organisation to deliver services better and to meet the needs and expectations of its community in what is a fast changing and dynamic environment. The benefits of successful risk management include improved service delivery, financial performance and corporate governance.

1.2 This policy explains Lancaster City Council's approach to risk management and the framework that will operate to establish and drive an effective system not only to minimise risk but also to enable continuous improvement at every level of the organisation.

2.0 Scope

2.1 This policy applies to all staff, Councillors and all working groups and partnerships. The responsibilities of these groups and the individuals within them, for the implementation and the effective management of risk is detailed below.

2.2 This policy and guidance will be reviewed periodically to take account of changing legislation, government initiatives, best practice and experience gained within the council.

3.0 Risk Management Objectives

3.1 The council has identified a number of key risk management objectives that need to be met to ensure a robust risk management framework is embedded across the council, namely:

- Adopt a strategic approach to risk management to make better informed decisions which is vital to successful transformational change
- Set the 'tone from the top' on the level of risk we are prepared to accept on our different service delivery activities and priorities
- Acknowledge that even with good risk management and our best endeavours, things can go wrong. Where this happens, we use the lessons learned to try to prevent it from happening again
- Develop leadership capacity and skills in identifying, understanding and managing the risks facing the council
- Integrate risk management into how we run council business/services. Robust risk management processes help us to achieve our core purpose, priorities and outcomes.
- Support a culture of well-measured risk taking throughout the council's business. This includes setting risk ownership and accountabilities and responding to risk in a balanced way, considering the level of risk, reward, impact and cost of control measures.
- Ensure that the council continues to meet all statutory and best practice requirements in relation to risk management
- Ensure risk management continues to be a key and effective element of our Corporate Governance arrangements

4.0 Benefits

4.1 In addition to supporting strategic and operational business planning, if risk management is thoroughly embedded and practices are consistently applied it can bring a number of other key benefits to the organisation, namely:

- Improved service delivery and financial performance, supporting the effective use of the council's resources
- Improved decision making and budgeting
- Continuous service improvement
- Enhanced communication between staff, Councillors and partners.

5.0 Definitions

5.1 Risk can be defined as:

> *"An uncertain event that, should it occur, will have an effect on the council's objectives and/or reputation. It is the combination of the probability of an event (likelihood) and its effect (impact)."*

Risk management can be defined as:

> *"The systematic application of principles, approach and processes to the identification, assessment and monitoring of risks."*

5.2 By managing our risk process effectively we will be in a better position to safeguard against potential threats and exploit potential opportunities to improve services and provide better value for money.

5.3 Risk management is applied at all levels of service delivery across the council. The council separates risk into three categories:

Corporate Strategic Risks – Risks that could have an effect on the successful achievement of our long-term core purpose, priorities and outcomes. These are risks that could potentially have a council-wide impact and/or risks that cannot be managed solely at a service level because higher level support/intervention is needed.

Operational / Service Risks – Risks that could have an effect on the successful achievement of the service or business outcomes / objectives. Potentially these risks could have a significant financial, reputational and/or service delivery impact on the business unit as a whole.

Project Risks - For strategic projects these registers will include risks relating to the completion of the project. These will be included within GRACE once the project has been agreed and any external funding accepted. For smaller projects the risk may be included in the services risk register with the project risk type recorded against the risk. However, for projects managed by an external organisation it is accepted that risks registers may need to be held outside of the GRACE system, ensuring that alternative monitoring arrangements are in place.

6.0 Risk Management Standards

6.1 A number of standards have been developed worldwide to help organisations implement risk management systematically and effectively. These standards seek to establish a common view on frameworks, processes and practice, and are generally set by recognised international standards bodies or by industry groups.

6.2 Despite the publication of the global risk management standard in 2009; ISO 31000, the Institute of Risk Management (IRM) has decided to retain its support for the original 'Risk Management Standard' that was published in 2002 because it is a simple guide that outlines a practical and systematic approach to the management of risk. The standard is not prescriptive i.e. a box ticking exercise or a certifiable process. Instead, the standard represents best practice against which organisations can measure themselves. The council has reviewed this policy against this standard.

7.0 Risk Management Approach

7.1 The purpose of the risk management approach outlined in this policy is to:

- Provide standard definitions and language to underpin the risk management process
- Ensure risks are identified and assessed consistently throughout the organisation through the clarification of key concepts
- Clarify roles and responsibilities for managing risk
- Implement an approach that meets current legislative requirements and follows best practice and relevant standards

7.2 Before we can identify our risks we need to establish the context by looking at what we are trying to achieve and what our proposed outcomes are. Depending on the area under review, the relevant objectives and outcomes will usually be detailed in existing documents, e.g. council plan, individual services plans, project briefs, partnership agreements etc.

To ensure consistency, the following four steps should be followed when identifying, evaluating, treating / mitigating and reviewing risks:

Step 1 – Identifying risk
Risk identification should be approached in a methodical way to ensure that all significant activities within the organisation have been identified and all risks flowing from these activities have been defined. Many risks will be identified as part of the routine service planning stages where barriers to specific business objectives can easily be recognised. All staff have a duty to report emerging risks to their heads of service / manager as and when they are identified. Risks can arise and be identified when the following events occur:

- the change of internal or external processes
- staff/councillors leave and/or restructuring takes place
- through procurement of a new supplier or asset
- partners change or are re-structured
- legislation is revised or introduced
- the social and or economic climate alters
- new projects are undertaken
- an incident occurs

To help in the risk identification process a number of common risk assessment techniques/methods can be used, for example, questionnaires, checklists, workshops, brainstorming sessions, audits and inspection reports or flowcharts.

To act as a prompt and to ensure completeness, a checklist of risk categories has been developed around the acronym '**PERFORMANCE'**.

Political	Opportunities/ Outcomes	New Partnerships
Electronic	Reputation	Customers / Citizens
Regulatory	Management	Environment
Financial	Assets	

Examples of risks from each category are detailed in the Risk Identification Checklist at Appendix 1.

When describing risks, it helps to display the identified risk in a structured format to ensure a comprehensive risk identification, description and assessment process takes place. The council has developed a corporate format which must be used to identify, evaluate and mitigate risk. Templates can be located on the intranet.

Once identified, all risks are recorded in the appropriate 'Risk Register' on the Grace risk management system. Risks recorded in the register should be given a unique identifier. A risk owner must be allocated and recorded against each risk on the risk register. Such accountability helps to ensure 'ownership' of the risk is documented and recognised. A risk owner is defined as a person with the accountability and authority to effectively manage the risk. At this stage there may well be a long list of possible risks. The next step will help to prioritise these in order of importance.

Step 2 – Analysing and Evaluating risk

In order to analyse and evaluate risks, a thorough risk assessment needs to be undertaken. That is, a detailed analysis of the potential threats faced by the council which may prevent achievement of its objectives. Through consideration of the sources of the risk, possible consequences, and the likelihood of those consequences occurring, it helps make decisions about the significance of risks and whether they should be accepted or treated.

To ensure that a consistent scoring mechanism is in place across the council, risks are assessed using the agreed criteria for likelihood and impact detailed in Appendix 2. When assessing the risk, the highest measure identified in each table is the score taken to plot the risk level on the risk matrix (Table 1). Where the likelihood and impact cross, determines the risk level.

For example, a Likelihood of 2 (possible) and a Very High Impact of 4 would result in a risk level of 8.

Table 1

Impact				
Very High	**4**	**8**	**12**	**16**
High	**3**	**6**	**9**	**12**
Medium	**2**	**4**	**6**	**8**
Low	**1**	**2**	**3**	**4**
	Unlikely	**Possible**	**Likely**	**Very Likely**

Likelihood

A "traffic light" approach is used to show high (red), medium (amber) and low (green) risks.

First Risk Score – Inherent (Gross) Risk Score
Following identification of the risk, a score for the gross likelihood and gross impact will be given to the risk as it currently stands, to ascertain the inherent (gross) risk score. The inherent risk score is the score given before any controls or actions are taken to alter the risk's impact or likelihood.

Second Risk Score – Residual Risk Score
Risks are then re-scored to ascertain the residual risk score. This is the score given when taking into consideration any controls already in place and/or any existing actions that are not operating effectively.

The residual risk score will be the deciding factor as to whether further action is required. It is at this point that a risk response category is assigned by the risk owner to determine what, if any, action is to be taken e.g. reduce or accept the level of risk. (See appendix three for further information on risk response categories).

Third Risk Score – Target Risk (Retained Risk) Score
If a risk requires further mitigating action in order to reduce the risk score to within a tolerable level, the risk owner needs to set a realistic target score and develop an action plan which when implemented will reduce the risk to within the target risk score.

Step 3 – Treatment and Action Planning
Actions, which will help to minimise the likelihood and / or impact of the risk occurring, are identified where the risk score needs to be reduced further. One or more action plan owners should be identified for each action.

Net risks are prioritised by applying the same criteria and matrix used for assessing the gross risk level (Step 2). It is the risk owner's responsibility to ensure that the agreed net risk level for each risk is an accurate reflection of the likelihood and impact measures detailed in Appendix 2.

Not all risks can be managed all of the time, so having assessed and prioritised the identified risks, cost effective action needs to be taken to manage those that pose the most significant threat.

Risk may be managed in one, or a combination of, the following ways:

- Avoid - A decision is made not to take a risk
- Accept - A decision is taken to accept the risk
- Transfer - All or part of the risk is transferred through insurance or to a third party
- Reduce - Further additional actions are implemented to reduce the risk
- Exploit - Whilst taking action to mitigate risks, a decision is made to exploit a resulting opportunity.

These are described in more detail in Appendix 3. The managed approach to risk should always be documented in the risk register, for example, after assessment of the risk, a decision may be made to 'transfer' the risk, therefore no further mitigating controls are required.

Step 4 – Monitoring and Reporting
Risk management should be thought of as an ongoing process and as such risks need to be reviewed regularly to ensure that prompt and appropriate action is taken to reduce their likelihood and/or impact.

Regular reporting enables senior managers and Councillors to have greater awareness of the extent of the risks and progression being made to manage them. Risk workshops will be administered on an annual basis. The Grace Risk Management system will encourage risk owners to monitor and update identified risks on a regular basis. For 'red' risks the system will issue reminders on a quarterly basis, for 'amber' risks reminders will be issued every six months and for 'green' risks reminders will be issued once a year. Risk owners are able to update their risks more frequently than this if desired.

In addition, quarterly reminders will be sent to Heads of Service / Managers asking them to consider / add newly identified risks to the system throughout the course of the year.

Updates from the strategic risk register will be reported to the Audit Committee at each of their meetings.

8.0 Risk Appetite

8.1 The council's risk appetite refers to the amount and type of risk that it is prepared to pursue, retain or take in pursuit of our objectives before action is deemed necessary to reduce the risk.

Risk appetite is not a single, fixed concept; there will be a range of appetites for different risks which need to be aligned and regularly reviewed as this will change/vary over time.

8.2 Generally, the Council has low appetite for regulatory and reputational risks and will put in sufficient controls through its policies and procedures to manage the risk to their lowest reasonable levels of impact and likelihood. However, the Council is open to risks in its delivery of priorities and outcomes and will adopt a trust-based and partnership working approach. The Council seeks to find and support opportunities and innovative solutions to optimise the delivery of Plan 2030. Where the Council is more open to risk, officers are still expected to ensure that adequate governance, risk management and internal controls are in place, but it is expected the residual risk may remain higher even with these measures in place.

9.0 Risk Registers

9.1 To ensure that the risk registers are comprehensive and accurately reflect the levels of risk within the council, all relevant and available sources of information will be used in their compilation and review, namely:

- The council's Annual Governance Statement
- Internal audit reports
- External audit reports
- Committee reports / portfolio holder / officer delegation reports
- Risk Assessments
- Incident / accident reports
- Insurance claims and advice from the council's Insurers
- Complaints
- Any relevant articles from risk management publications

9.2 Colleagues within the Office of the Chief Executive (OCE) will oversee administration of both strategic and operational risk registers within the Grace Risk Management system. Identified risk owners will ultimately be responsible for monitoring and updating their risk scores and actions plans.

9.3 The Grace system will automatically send risk owners a weekly email reminder of any overdue risk reviews and overdue actions, and OCE colleagues will monitor risk movements to ensure that risk owners are updating records as and when required.

Managers are encouraged to amend risk scores or descriptions with the intention of maintaining a culture of openness. The OCE will spot check a selection of amendments to ensure that actions taken e.g. increased or improved control, or another viable explanation e.g. the activity ceases altogether, has been recorded within the system to support the change.

10.0 Roles and Responsibilities

To ensure risk management is effectively implemented, all staff and Councillors should have a level of understanding of the council's risk management approach and regard risk management as part of their responsibilities:

All Employees

- Manage day to day risks and opportunities effectively and report risk management concerns to their line managers
- Participate fully in risk workshops and action planning as appropriate
- Attend training and awareness sessions as appropriate

All Councillors

- Support and promote an effective risk management culture
- Constructively review and scrutinise the risks involved in delivering the council's core purpose, priorities and outcomes

Cabinet

- Risk manage the council in delivering its core purpose, priorities and outcome
- Consider and challenge the risks involved in making any 'key decisions'

Audit Committee

- Provide independent assurance to the council on the overall adequacy of the risk management framework, including review of proposed amendments to the Risk Management Policy prior to its presentation to Cabinet
- Review and challenge the content of the strategic risk register
- Approve and review recommendations and amendments to the Risk Management Policy

Senior Leadership Team

- Champion an effective council-wide risk management culture
- Ensure Councillors receive relevant risk information
- Responsible for owning and managing corporate strategic risks, which will be reviewed quarterly or more often when needed.

Corporate Directors

- Risk manage their directorate in delivering the council's core purpose, priorities and outcomes. Ensuring colleagues are updating their risk registers as required.
- Constructively review and challenge the risks involved in decision making

Heads of Service / Managers

- Responsible for the effective leadership and management of risk in their service areas to meet service objectives / outcomes in line with the council's risk management framework
- In conjunction with the appropriate risk owner, maintain the relevant risk registers ensuring all key risks are identified, managed and reviewed in line with the corporate risk management approach

- Promptly escalate risks appropriately
- Encourage staff to be open and honest in identifying risks and opportunities
- Ensure risk management process is an explicit part of transformation and all significant projects
- Ensure that appropriate resources and importance are allocated to the process
- Provide assurance that the risks for which they are the risk owner are being effectively managed. This will be completed as part of the Annual Governance review process.

Risk Owners

- Take ownership of the action/s they are responsible for by either confirming the existence and effectiveness of existing actions or ensuring that any further actions are implemented

Partners

- Where appropriate participate in the development of a joint partnership risk register
- Actively manage risk within the partnership
- Report on risk management issues to partnership boards or equivalent

Project Managers

- Ensure that the risks associated with their projects are identified, recorded and regularly reviewed as part of the project management process
- Provide assurance about the management of those risks

Office of the Chief Executive

- Design and facilitate the implementation of a risk management framework ensuring it meets the needs of the organisation
- Act as a centre of expertise, providing support and guidance as required
- Act as systems administrators for the Grace risk management system and check that risk owners are updating their assigned risks in accordance with the schedule. Escalating to senior management as required.
- Collate risk information and prepare reports as necessary to both the Senior Leadership Team and the Audit Committee

Internal Audit

- Ensure the Internal Audit work plan is focused on the key risks facing the council
- During all relevant audits, challenge the content of risk registers to provide assurance that risks are being effectively managed.
- Periodically arrange for the independent review of the council's risk management process and provide an independent objective opinion on its operation and effectiveness

11.0 Embedding Risk Management

For risk management to be effective and a meaningful management tool, it needs to be an integral part of key management processes and day-to-day working. As such, risks and the monitoring of associated actions should be considered as part of a number of the council's significant business processes, including:

- Corporate Decision Making – significant risks, which are associated with policy or action to be taken when making key decisions, are included in appropriate committee reports.

- Business / budget planning – this annual process includes updating the relevant risk registers to reflect current aims / outcomes.

- Project Management – all significant projects should formally consider the risks to delivering the project outcomes before and throughout the project. This includes risks that could have an effect

on service delivery, benefits realisation and engagement with key stakeholders (service users, third parties, partners etc.).

- Partnership Working – partnerships should establish procedures to record and monitor risks and opportunities that may impact the council and/or the partnership's aims and objectives.

- Procurement – all risks and actions associated with a purchase need to be identified and assessed, kept under review and amended as necessary during the procurement process.

- Contract Management – significant risks associated with all stages of contract management are identified and kept under review

- Insurance – the council's Insurance Officer manages insurable risks and self-insurance arrangements.

- Health and Safety – the council has specific policies and procedures to be followed in relation to health and safety risks.

12.0 Culture

The council will be open in its approach to managing risks and will seek to avoid a blame culture. Lessons from events that lead to loss or reputational damage will be shared as well as lessons from things that go well. Discussion on risk in any context will be conducted in an open and honest manner.

13.0 Training and Awareness

Having documented a robust approach and established clear roles and responsibilities and reporting lines, it is important to provide officers and Councillors with the knowledge and skills necessary to enable them to manage risk effectively. Colleagues within OCE will act as administrators for the council's Grace risk management system and will provide advice and arrange training for colleagues as required.

14.0 Summary

This policy and the ongoing efforts to embed sound risk management principles into the council's 'fabric' will improve the way in which services are delivered. A solid, well-documented and comprehensive approach to risk management and its adoption into the decision-making process is good practice, essential to good management and strengthens the council's governance framework.

Appendix 1 - Check List for Risk Identification (PERFORMACE)

Political

- Change in Government policy
- Councillor support / approval
- Political personalities
- New political arrangements

Economic

- Demographics
- Economic downturn - prosperity of local businesses / local communities

Regulatory

- Legislation and internal policies/regulations including:
    - Health & Safety at Work Act, Data Protection, Freedom of Information, Human Rights, Equalities Act 2010 and Public Sector Equality Duty 2011, Employment Law, TUPE, Environmental legislation etc.
- Grant funding conditions
- Legal challenges, legal powers, judicial reviews or public interest reports

Financial

- Budgetary pressures
- Loss of/reduction in income/funding
- Cost of living/inflation, interest rates, increase in energy costs
- Financial management arrangements
- Investment decisions, Sustainable economic growth
- Affordability models and financial checks
- Inadequate insurance cover
- System / procedure weaknesses that could lead to fraud

Opportunities/ Outcomes

- Add value or improve customer experience/satisfaction
- Reduce waste and inefficiency
- Maximising independence for older people with disabilities
- Developing sustainable places and communities
- Protecting the community and making Lancaster a safer place to live

Reputation

- Negative publicity (local and national), increase in complaints

Management

- Loss of key staff, recruitment and retention issues
- Training issues
- Lack of/or inadequate management support
- Poor communication/consultation
- Capacity issues - availability, sickness absence
- Emergency preparedness / Business continuity

Assets

- Property - land, buildings and equipment,
- Information – security, retention, timeliness, accuracy, intellectual property rights
- ICT – integrity, security, availability, e-government
- Environmental - landscape, countryside, historic environment, open space

New Partnerships/ Projects/ Contracts

- New initiatives, new ways of working, new policies and procedures

- New relationships – accountability issues / unclear roles and responsibilities
- Monitoring arrangements
- Managing change

Customers/ Citizens

- Changing needs and expectations of customers - poor communication/consultation
- Poor quality / reduced service delivery - impact on vulnerable groups
- Crime and disorder, health inequalities, safeguarding issues

Environment

- Recycling, green issues, energy efficiency, land use and green belt issues, noise, contamination, pollution, increased waste or emissions,
- Impact of planning or transportation policies
- Climate change – hotter drier summers, milder wetter winters and more extreme events – heat waves, flooding, storms etc.

Appendix 2 – Measures of Likelihood and Impact

Table 1

Impact				
Very High	**4**	**8**	**12**	**16**
High	**3**	**6**	**9**	**12**
Medium	**2**	**4**	**6**	**8**
Low	**1**	**2**	**3**	**4**
	Unlikely	**Possible**	**Likely**	**Very Likely**

Likelihood

Likelihood Measures

	Unlikely **1**	**Possible** **2**	**Likely** **3**	**Very Likely** **4**
Probability	**Less than 10%** chance of circumstances arising	**10% to 40%** chance of circumstances arising	**41% to 75%** chance of circumstances arising	**More than 75%** chance of circumstances arising
Timescale	Is **unlikely** to occur.	Possible in the **next 3 or more years**.	Likely to occur in the **next 1-2 years**.	Occurred in the **past year** or is very likely to occur in the **next year**.

Impact Measures

	Low - 1	Medium - 2	High - 3	Very High - 4
People / Duty of Care	Low level of foreseeable minor injuries	High level of foreseeable minor injuries Low level of foreseeable serious injuries	High level of foreseeable severe injuries	Foreseeable long-term injury, illness
Financial Impact	Up to £500k Less than 5% over project budget	Up to £2 million 5-10% over project budget	Up to £5 million 11-25% over project budget	Over £5 million More than 25% over project budget
Legal Impact	Minor civil litigation	Major civil litigation and/or local public enquiry	Major civil litigation and/or national public enquiry	Legal action certain Section 151 or government intervention or criminal charges
Service Impact	Short term service disruption	Noticeable service disruption affecting customers	Significant service failure but not directly affecting vulnerable groups	Serious service failure directly affecting vulnerable groups
Project Delivery	Minor delay to project	Significant delay to project	Project fails to deliver target impacting on the service performance	Project fails to deliver target impacting on council's performance
Intervention Required	Intervention by Service Manager, Project Manager or equivalent	Intervention by Head of Service or equivalent.	Intervention by the Executive or Board	Intervention by Boars or Council
Reputation Impact	Short term negative local media attention	Significant negative local media attention	Sustained negative local media attention and/or significant national media attention	Sustained negative national media attention

Appendix 3 - Risk Response Categories

Category	Opportunity or Threat	Description
Accept	Threat	A decision is taken to accept the risk. Management and/or the risk owner make an informed decision to accept that existing actions sufficiently reduce the likelihood and impact of a risk and there is no added value in doing more.
Avoid	Threat	A decision is made not to take a risk. Where the risks outweigh the possible benefits, avoid the risk by doing things differently e.g. revise strategy, revisit objectives or stop the activity.
Fallback	Threat	Put in place a fallback plan for the actions that will be taken to reduce the impact of the threat should the risk occur. This is a reactive form of the 'reduce' response which has no impact on likelihood.
Reduce	Threat	Implement further additional action(s) to reduce the risk by: • minimising the likelihood of an event occurring (e.g. preventative action) and/or • reducing the potential impact should the risk occur (e.g. business continuity plans) Further actions are recorded in the risk register and regularly monitored.
Transfer	Threat	Transfer all or part of the risk through insurance or to a third party e.g. contractor or partner, who is better able to manage the risk. Although responsibility can be transferred, in most cases accountability remains with the council, so this still needs to be monitored.
Share	Threat or Opportunity	Share is different from the transfer response. It seeks multiple parties, typically within the supply chain, to share the risk on pain/gain share basis.
Enhance	Opportunity	Proactive actions taken to: • Enhance the probability of the event occurring. • Enhance the impact of the event should it occur.
Exploit	Opportunity	Whilst taking action to mitigate risks, a decision is made to exploit a resulting opportunity.
Reject	Opportunity	A conscious and deliberate decision is taken not to exploit or enhance the opportunity, having discerned that it is more economical not to attempt an opportunity response action. The opportunity should continue to be monitored.