



BOARD REPORT

REPORT No.: 2022-56

MEETING DATE: SEPTEMBER 15, 2022

SUBJECT: ENTERPRISE RISK MANAGEMENT - ANNUAL UPDATE

RECOMMENDATION

For information only.

REPORT SUMMARY

To provide The District of Thunder Bay Social Services Administration Board (TBDSSAB or the Board) with an update on the organization's Enterprise Risk Management (ERM) Framework.

BACKGROUND

Developing an ERM System was identified as a component of the 2017 - 2020 Practical Vision of TBDSSAB; specifically, as a component within Transparent and Sustainable Finances.

To strengthen TBDSSAB risk management functions and develop a fulsome process, Administration began the process of establishing a comprehensive risk management overview and framework.

The Board approved the ERM Policy at its November 2018 Meeting, which included direction that Administration complete an ERM Framework.

The Board approved the ERM Framework, and resultant risk tolerance at its November 2019 Meeting, and Risk Appetite Statement at its December 2019 meeting.

At its September 17, 2020, meeting, the Board approved the annual reporting template and cycle for the Residual Heat Map and Risk Trajectory Dashboard.

The first annual ERM update was provided to the Board at its September 16, 2021 meeting.

COMMENTS

In its first iteration of the ERM Framework, Administration worked to identify all possible risks to the organization with the understanding that through regular monitoring and measuring of the Framework, refinements would be made to more accurately or appropriately identify the Key Risks to TBDSSAB.

In that regard, updates were made during the first review in 2021 and provided to the Board. Further updates were made as a result of Administration's review process in 2022, in accordance with the approved ERM Policy (CS-01:120).

ERM Summary Updates

1. Change from Primary Risk to Secondary Risk

The effectiveness of the ERM Framework is reviewed through an ongoing monitoring process. Through this process, the appropriateness of the various risks is confirmed with further refinements made as a result of Administration's review of the ERM over the past year.

Originally, all risks were defined as primary risks; however, in 2021, certain items were reclassified as secondary risks based on further review, as well as the results of measuring the risks during that year.

That same process was completed during the annual review this year, and additional items were identified as secondary risks where limited exposure continued based on the history, as well as the results of measuring the risks during the year.

Based on continued monitoring of results, risks identified as Secondary Risks in 2021 will remain classified as such; additional items were reclassified as Secondary Risks through this year's review. Secondary risks will continue to be monitored to ensure the classification to secondary remains relevant, however, would not be reported within the Residual Heat Map, nor the Risk Trajectory Dashboard, due to their low risk assessment and results during the previous year.

In particular, the following risks were reclassified as secondary risks:

#	Description – Nature of Risk	Rationale
F10	Risk that rent revenues could decrease due to changes in tenant mixture and/or Provincial programs.	Rent Revenues would be included in F7, along with all other components of the financial status of the organization, e.g., Provincial funding, utilities, property taxes; therefore, move to Secondary risk to continue to track individual items, but rent revenue risk is one of many components of the risk of running an in-year operating deficit overall that cannot be mitigated.
P32	Risk that third-party labour disputes disrupt /interrupt TBDSSAB operations and programs.	This risk is deemed low, given mitigation strategies identified and the likelihood of impact.
P34	Risk that clients/tenants/vendors take advantage of internal control weaknesses in third-party operations (bank software).	This risk related to cheques issued by TBDSSAB has been reduced given the significant increase in electronic payment processes (approximately 95% of clients use electronic payment processes, and 99% of vendors are on electronic payment processes), therefore there is a significant reduction in exposure relative to the previous paper payment processes.

2. Combined Risks

Certain risks were identified as being fundamentally similar and could be combined without losing the integrity of the nature of risk and its potential impact on TBDSSAB. In particular:

- **S1 and S3** were combined into **S1**. Given that TBDSSAB exists as a result of legislation (*DSSAB Act*), and therefore defines DSSAB's programming, the risk relates to the ability to mitigate any programming change impact through awareness of provincial changes as identified in S1.
- **P29 and P33** were combined into one under the Human Capital section and will be renumbered and reworded as **H61**: Risk that tenant or patron behaviours (physical, violent, harassment) impact staff, stakeholders and other tenant/ patron safety (HQ and satellite offices, TBDSSAB facilities, vehicles).

3. Risks Removed

Risks were considered for removal if, after monitoring for the past year, it was determined that they are not a risk for TBDSSAB. One risk was identified for removal:

- **P30** - Risk that vendor enters wrong tenant unit.

4. Other Updates

Further clarification/revisions were made to the Nature of Risks throughout the ERM summary to more closely align with the intent of the risks for TBDSSAB.

The updated ERM Summary is provided in Attachment 1.

Summary

With the updated ERM Summary, and based on the experiences across the organization, the Assessed Residual Risk was also updated. Overall, the risk exposure has remained largely consistent with the original assessment of the Types of Risk identified within the ERM Summary, and that the key controls continue to be effective to treat the risks.

One exception continued to be P20, which has increased from focusing on best practices to requiring immediate focus due to an unusual number of weather events which caused significant disruption to properties and services during the year. The organization has continued to build upon its commitment relative to reduction in greenhouse gas emissions through capital building updates and reviewing options relative to further engagement with environmental stewardship strategies. The global pandemic continued to impact the organization in this area as well.

In addition, P27, increased from monitoring, to monitoring with a view to best practice improvements, specifically related to tenant and community activity within certain housing properties. TBDSSAB is in the process of having a security review completed through an external consultant so that recommended best practices can be considered in this area.

The updated Residual Heat Map is provided in Attachment 2, and the resulting Risk Trajectory Dashboard is provided in Attachment 3.

STRATEGIC PLAN IMPACT

Monitoring, reviewing and updating the Enterprise Risk Management System aligns with the financial stewardship component of the strategic plan to support a strong organization.

FINANCIAL IMPLICATIONS

There are no immediate additional financial implications associated with this report. Future decisions related to the management of risk may impact resource allocation, and will be identified during the annual budget process, or as required.



CONCLUSION

It is concluded that the monitoring and updating of the ERM has been completed, and the results have been presented through the Residual Heat Map and Risk Trajectory Dashboard.

It is also concluded that the Key Controls remain relevant to support the treatment of risk across the organization.

REFERENCE MATERIALS

- Attachment #1 [Updated Enterprise Risk Management Summary](#)
- Attachment #2 [Residual Heat Map](#)
- Attachment #3 [Risk Trajectory Dashboard](#)

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Category	Type of Risk	#	Nature of Risk	Key Controls	Likelihood	Impact	Residual Risk Level
STRATEGIC Risk of not being able to respond well to external changes as a result of inaction, ineffective strategies, or poor implementation of strategies	Management Information Risk	S1	Risk that information is not available, timely, or accurate about program operations to enable informed decision-making	Proactively planning for local client/tenant needs, economic trends, and other factors impacting program delivery; monitoring monthly operational statistics. Proper communication channels are in place to effectively communicate direction, program changes, etc. Internal processes for finance, purchasing, IT; membership, effective management, professional development, best-practice research. Proactively planning, process reviews, program realignment.	2	4, changed to 3, given incorporation of S3 into S1	6
		S2	Risk that we do not maximize the use of technology to achieve identified outcomes (appropriate training/process reviews/updated procedures)	Training, continuous improvement, Job Aids, support for external funded organizations on technology use; Internal training and policies.	1	2	2
FINANCIAL AND LIQUIDITY Risk that TBDSSAB will be unable to meet its financial commitments in a timely manner (suppliers, lenders, investments, compensation, and benefits)	Liquidity Risk	F7	Risk of running an in-year operating deficit overall that can't be mitigated	Management processes, Levy Stabilization Reserve Fund, effective Reserve Fund Strategy , quarterly monitoring processes (i.e., variance reports); exceeding cost-sharing ratio, if required, with the ability to levy under <i>DSSAB Act</i> .	2	1	2
REGULATORY/ COMPLIANCE Risk of not complying with regulatory and other obligatory authoritative requirements	Regulatory Compliance	R16	The risk of inadvertent or negligent errors, acts or omissions of employees or agents that are inconsistent with, and/or in breach of, regulatory or other obligatory authoritative requirements (QMS is the treatment) in meeting corporate regulatory obligations, eg. non-compliance with DSSAB Act.	Robust infrastructure/decision-making processes to meet/deliver on numerous and competing priorities. Policies and Procedures, employee training, orientation, communication, technology (laptops vs. thumbdrives, encrypted thumbdrives vs. unprotected). Quality Management Systems (QMS); Service Agreements; Job Aids; Training for changes in legislation/regulations.	1	1	1

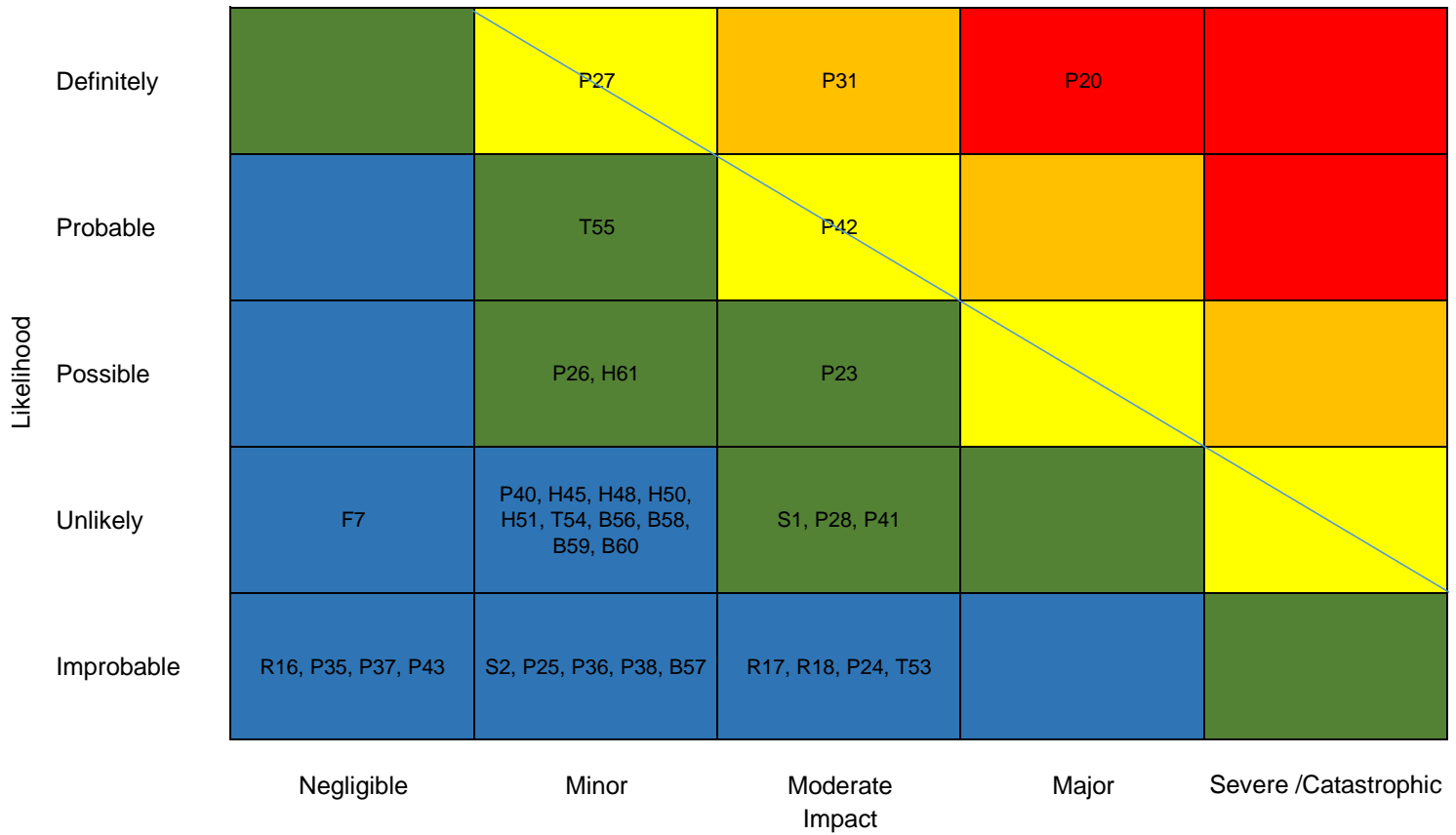
Category	Type of Risk	#	Nature of Risk	Key Controls	Likelihood	Impact	Residual Risk Level
REGULATORY/ COMPLIANCE (cont)	Regulatory Compliance (cont)	R17	Risk of not meeting requirements in <i>OH&S Act</i> and Regulations	Processes exist so that situations are responded to in a timely manner, and the risk of repeat incidents is minimized through appropriate policies, procedures and training. Client/tenant files are properly recorded;- Satellite Office procedures (eg. Modified-Emergency Handbook for Satellite-Offices); Appropriate policies, procedures and training to ensure compliance with the Act; Incidents and injuries are responded to, and appropriate corrective action is taken in a timely manner to minimize the risk of repeat incidents. Active Joint Health and Safety Committee (certified members). Annual audit of Health and Safety Program. Regular Health and Safety inspections and risk assessments.	1	3	3
	Regulatory Change	R18	Risk that changes in building codes, fire safety requirements or regulatory inspections could have a financial and operational impact on current and future building operations	Planning, communication, capital reserves, external program funding.	1	3	3
OPERATIONAL/ PROGRAMS The risk of operational/ program impact resulting from inadequate or failed internal processes, people and systems, or from external events	Environmental Risk	P20	Risk that Acts of Nature, including extreme weather events (fire, storm, wind, flood) or other events (explosion, power failure, biohazards) would negatively impact building operations and possibly displace tenants	Disaster Recovery Site; Property Insurance; HQ and Satellite Offices emergency plans; Reserve Funds.	5	4	20
	Property/ Equipment System Risk	P23	Risk that building systems' failures (heating, water heating, potable water, air exchange, emergency generators) could impact tenants and require financial investment	Emergency and Evacuation Plans, Property Insurance, Purchasing processes, Reserve Funds.	3	3	9
		P24	Risk that server recovery is not timely or complete so that client/tenant service is impacted (Hardware/software applications)	In-house expertise; Vendor/Partner Maintenance Agreements and SLAs (Service-Level Agreements); OffSite and OnSite back-ups; Disaster Recovery Site; Network Security protocols; property insurance.	1	3	3
		P25	Risk that telecommunication system cannot be recovered on a timely basis so that client/tenant service is impacted	In-house expertise; Vendor/Partner Maintenance Agreements and SLAs (Service-Level Agreements); Off-Site and On-Site back-ups; Disaster Recovery Site; Network Security protocols; property insurance, mobile phones.	1	2	2
		P26	Risk that Satellite Offices cannot connect for an extended period of time	Manual processes (paper documentation); back-up internet connection.	3	2	6

Category	Type of Risk	#	Nature of Risk	Key Controls			
					Likelihood	Impact	Residual Risk Level
	Third-Party Risk	P27	Risk that tenant activities (negligence or criminal) could impact building operations and displace tenants or require financial investment	Property Insurance, emergency plans, use of alternate accommodations. Security Infrastructure, Police relationships.	5	2	10
		P28	Risk of tenant health issues impacting staff, other tenants, stakeholders, or themselves	Policies and PPE, removal of persons, public health, appropriate preventative, investigative, reporting and corrective action measures.	2	3	6
	Third-Party Risk (cont)	P31	Risk that community at large (eg., gangs, drugs) negatively impacts TBDSSAB property (vandalism, dumping, theft)	Emergency plans, security systems, Resource centres, insurance, use of alternate accommodations.	5	3	15
Process Risk		P35	Risk of applicant receiving assistance, not receiving accurate information (all programs)	Processes established to ensure staff receive timely updated program information (Intake provides initial contact with the client/tenant).	1	1	1
				Training, Cross team communication, awareness; team meetings, cross-divisional training, weekly updates to staff.			
		P36	Risk of errors in granting Ontario Works benefits (Financial and Employment)	Paylist review in process.	1	2	2
				Signing Authority process for CW; Supervisory File Review for new CW, Staff training.			
				Supplemental SAMs control through enhanced Eligibility Verification Process (EVP) process for FORM 1			
P37	Risk of errors in granting Child Care Fee Subsidy	Practices exist to ensure clients/tenants are notified in a timely manner of changes or updates to their payments, benefits, eligibility, as well as program information.	1	1	1		
		Process in place where all files are reviewed by Supervisor. Fee Subsidy Process review is in the early stages of development.					
P38	Risk of errors in calculating RGI rent subsidy, portable housing benefit, rent supplement, and supplier contracts (landlord contracts)	Oversight, staff training, reviews.	1	2	2		
Demographic Risk	P40	Risk of lack of suitability of housing units to meet tenant need (aligning unit sizes with demand)	Long-range planning, reviews, external supports.	2	2	4	
Legal Risk	P41	Risk of liability in third-party landlord properties (H&S, contracts)	Programs, incentives, financial reserves.	2	3	6	

Category	Type of Risk	#	Nature of Risk	Key Controls	Likelihood	Impact	Residual Risk Level
	Program Delivery Risk	P42	Risk of inadequate and/or inappropriate employment planning for clients/tenants so that clients/tenants do not receive the services they need	EUREKA! Process review in progress to focus on enhanced employment outcomes through PA follow up; impacted by client co-operation/participation; reduced caseworker:caseload ratio to align with Ministry [informal] ratio target. Residual risk expected to be impacted once process review is fully implemented.	4	3	12
		P43	Risk of not following policies and procedures	<p>Training and orientation practices in place so that management skills are developed and sufficient to ensure effective employee supervision.</p> <p>Processes exist so that policies and procedures are reviewed with staff.</p> <p>Supervisory oversight and monitoring; staff training, management training.</p> <p>Appropriate training and orientation practices are in place for all staff.</p> <p>Comprehensive Management training and orientation to ensure effective employee supervision.</p> <p>Annual review of Policies and Procedures, accompanied by Staff Acknowledgement Sign-off.</p>	1	1	2
HUMAN CAPITAL	Hiring/ Retention Risk	H45	Risk that we cannot attract suitable qualified candidates for key positions (skilled trades, technical, management)	Position description are monitored to ensure up-to-date requirements are identified; recruitment and selection practices/process.	2	2	4
Risk associated with inadequate human resource policies, processes and practices to hire, develop and retain resources and appropriate competencies to operate the programs and maintain a safe, ethical, and non-discriminatory work environment that complies with employment law		H48	Risk of unexpectedly losing a key member of the leadership team, or a high turnover rate (internal operations and public perception concerns)	<p>Robust orientation and onboarding. Succession planning, documented policies and procedures, training.</p> <p>Training, recruitment:</p> <p>Active participation in local and District job fairs, including Confederation College and Lakehead University.</p> <p>Comprehensive quarterly review of recruitment activities to identify trends.</p>	2	2	4
		H50	Risk that labour discord disruption impacts TBDSAB work environment operations.	Strong labour relations, planning, recovery site, use of external partners.	2	2	4
		H51	Risk of violation of TBDSAB Code of Conduct harassment and bullying in the workplace (also brand reputation) is not addressed, which may lead to negative legal/reputation outcomes.	<p>Appropriate onboarding, policies, procedures, training, supervision and corrective action.</p> <p>Promote and foster respectful and professional workplace with employee wellness and recognition initiatives.</p> <p>Annual review, and sign-off, of Policies and Procedures.</p>	2	2	4
Employee Misconduct							

Category	Type of Risk	#	Nature of Risk	Key Controls	Likelihood	Impact	Residual Risk Level
	Third Party Risk	H61	Risk that tenant or patron behaviours (physical, violent, harassment) impact staff, stakeholders and other tenant/ patron safety (HQ and offices, TBDSSAB facilities, vehicles)	Emergency plans, security systems and presence, alarms, Resource Centres, insurance, use of alternate accommodations. Appropriate policies, procedures, protocols and training are in place. Appropriate investigative, reporting and corrective measures are in place. Regular completion of Risk Assessments.	3	2	6
TECHNOLOGICAL	Information Security Risk	T53	Risk of cyber threats and IT security vulnerabilities	IT architecture is current so that programming is supported to the extent possible/under the control of TBDSSAB. In-house expertise; Vendor/Partner Maintenance Agreements and SLAs (Service-Level Agreements); OffSite and OnSite back-ups; Disaster Recovery Site; Network Security protocols.	1	3	3
The risk associated with inappropriate access or use of information	Information Security Risk - Breach	T54	Risk that there is a breach of confidential data: A) Risk that confidential/client/tenant files/sensitive documents leave the building B) Risk that email with key information is sent to incorrect individuals C) Risk that storage and communication devices will be stolen or misplaced or fail (laptops, phones, etc) D) Risk that hard-copy files are lost, misplaced or destroyed	Confidentiality Agreements upon hire; security protocols for vendors within the building; records' management processes; policies and procedures; file encryption; file transportation security protocols, client communication protocols.	2	2	4
	Third-Party Risk	T55	Risk that programs will be offline for extended periods of time, and impact operations (externally-hosted software)	Manual processes (paper documentation), redundancy plans; back-up internet providers connection.	4	2	8

Category	Type of Risk	#	Nature of Risk	Key Controls			
					Likelihood	Impact	Residual Risk Level
BRAND/ REPUTATION The risk of the potential for negative publicity, public perception or uncontrollable events to have an adverse impact on TBDSSAB's reputation, thereby affecting program delivery.	Third-Party Risk	B56	Risk that a serious occurrence in a funded agency is reflected on TBDSSAB	Initiated Agreements process. Operational Reviews.	2	2	4
		B57	Risk that unfavourable events (eg., security breach) impact TBDSSAB's reputation	Policies, communications.	1	2	2
	Public Perception /Brand Risk	B58	Risk of <i>perceived</i> unfair procurement activities	Broader Public Sector procurement directives; internal procurement policies and procedures; E-Bids and Tenders (transparent procurement processes); debriefing process.	2	2	4
		B59	Risk that complaints from clients, tenants, applicants, general public through MP/MPP office, or municipal councillor, Board Member, are not prevented or mitigated	Policy and Processes exist so that complaints are addressed in a timely manner and in accordance with standard process.	2	2	4
	Employee Misconduct	B60	Risk of misuse of social media platforms by staff, resulting in negative brand	Appropriate policy, procedure and training.	2	2	6
				Appropriate investigative, reporting and corrective measures.			
				Annual staff review, and sign-off, of Policy and Procedure.			
			Discipline issued for violation of Social Media Policy.				



- Red** Immediate Focus/Action Required
- Gold** Focus on best practice improvement
- Yellow** Monitor, with a view to Best Practice improvement
- Green** Monitor
- Blue** No action required

Category	Type of Risk	#	Nature of Risk	Risk Exposure - Original Assessment*	Risk Exposure at August, 2022	Trajectory**
<u>STRATEGIC</u> Risk of not being able to respond well to external changes as a result of inaction, ineffective strategies, or poor implementation of strategies	Management Information Risk	S1	Risk that information is not available, timely, or accurate about program operations to enable informed decision-making			↑
		S2	Risk that we do not maximize the use of technology to achieve identified outcomes (appropriate training/process reviews/updated procedures)			⇒
<u>FINANCIAL AND LIQUIDITY</u> Risk that TBDSSAB will be unable to meet its financial commitments in a timely manner (suppliers, lenders, investments, compensation, and benefits)	Liquidity Risk	F7	Risk of running an in-year operating deficit overall that can't be mitigated			⇒
<u>REGULATORY/ COMPLIANCE</u> Risk of not complying with regulatory and other obligatory authoritative requirements	Regulatory Compliance	R16	The risk of inadvertent or negligent errors, acts or omissions of employees or agents that are inconsistent with, and/or in breach of, regulatory or other obligatory authoritative requirements (QMS is the treatment) in meeting corporate regulatory obligations, eg. non-compliance with DSSAB Act.			⇒
		R17	Risk of not meeting requirements in <i>OH&S Act</i> and Regulations			⇒
	Regulatory Change	R18	Risk that changes in building codes, fire safety requirements or regulatory inspections could have a financial and operational impact on current and future building operations			⇒

Category	Type of Risk	#	Nature of Risk	Risk Exposure - Original Assessment*	Risk Exposure at August, 2022	Trajectory**
<u>OPERATIONAL/ PROGRAMS</u> The risk of operational/ program impact resulting from inadequate or failed internal processes, people and systems, or from external events	Environmental Risk	P20	Risk that Acts of Nature, including extreme weather events (fire, storm, wind, flood) or other events (explosion, power failure, biohazards) would negatively impact building operations and possibly displace tenants			↑
	Property/ Equipment System Risk	P23	Risk that building systems' failures (heating, water heating, potable water, air exchange, emergency generators) could impact tenants and require financial investment			⇒
		P24	Risk that server recovery is not timely or complete so that client/tenant service is impacted (Hardware/software applications)			⇒
		P25	Risk that telecommunication system cannot be recovered on a timely basis so that client/tenant service is impacted			⇒
		P26	Risk that Satellite Offices cannot connect for an extended period of time			⇒
	Third-Party Risk	P27	Risk that tenant activities (negligence or criminal) could impact building operations and displace tenants or require financial investment			↑
		P28	Risk of tenant health issues impacting staff, other tenants, stakeholders, or themselves			⇒
		P31	Risk that community at large (e.g., gangs, drugs) negatively impacts TBDSSAB property (vandalism, dumping, theft)			⇒
	Process Risk	P35	Risk of applicant receiving assistance, not receiving accurate information (all programs)			⇒

Category	Type of Risk	#	Nature of Risk	Risk Exposure - Original Assessment*	Risk Exposure at August, 2022	Trajectory**
		P36	Risk of errors in granting Ontario Works benefits (Financial and Employment)			⇒
		P37	Risk of errors in granting Child Care Fee Subsidy			⇒
		P38	Risk of errors in calculating RGI rent subsidy, portable housing benefit, rent supplement, and supplier contracts (landlord contracts)			⇒
	Demographic Risk	P40	Risk of lack of suitability of housing units to meet tenant need (aligning unit sizes with demand)			⇒
	Legal Risk	P41	Risk of liability in third-party landlord properties (H&S, contracts)			⇒
	Program Delivery Risk	P42	Risk of inadequate and/or inappropriate employment planning for clients/tenants so that clients/tenants do not receive the services they need			⇩
		P43	Risk of not following policies and procedures			⇒

Category	Type of Risk	#	Nature of Risk	Risk Exposure - Original Assessment*	Risk Exposure at August, 2022	Trajectory**
<u>HUMAN CAPITAL</u> Risk associated with inadequate human resource policies, processes and practices to hire, develop and retain resources and appropriate competencies to operate the programs and maintain a safe, ethical, and non-discriminatory work environment that complies with employment law	Hiring/ Retention Risk	H45	Risk that we cannot attract suitable qualified candidates for key positions (skilled trades, technical, management)			⇒
		H48	Risk of unexpectedly losing a key member of the leadership team, or a high turnover rate (internal operations and public perception concerns)			⇒
		H50	Risk that labour discord disruption impacts TBDSSAB work environment operations .			⇒
	Employee Misconduct	H51	Risk of violation of TBDSSAB Code of Conduct harassment and bullying in the workplace (also brand reputation) is not addressed , which may lead to negative legal/reputation outcomes.			⇒
		H61	Risk that tenant or patron behaviours (physical, violent, harassment) impact staff, stakeholders and other tenant/patron safety (HQ and offices, TBDSSAB facilities, vehicles)			⇒
<u>TECHNOLOGICAL</u> The risk associated with inappropriate access or use of information	Information Security Risk	T53	Risk of cyber threats and IT security vulnerabilities			⇒
	Information Security Risk - Breach	T54	Risk that there is a breach of confidential data: A) Risk that confidential/client/tenant files/sensitive documents leave the building B) Risk that email with key information is sent to incorrect individuals C) Risk that storage and communication devices will be stolen or misplaced or fail (laptops, phones, etc.) D) Risk that hard-copy files are lost, misplaced or destroyed			⇒
	Third-Party Risk	T55	Risk that programs will be offline for extended periods of time, and impact operations (externally-hosted software)			⇒

Category	Type of Risk	#	Nature of Risk	Risk Exposure - Original Assessment*	Risk Exposure at August, 2022	Trajectory**
BRAND/ REPUTATION The risk of the potential for negative publicity, public perception or uncontrollable events to have an adverse impact on TBDSSAB's reputation, thereby affecting program delivery.	Third-Party Risk	B56	Risk that a serious occurrence in a funded agency is reflected on TBDSSAB			⇒
		B57	Risk that unfavourable events (e.g., security breach) impact TBDSSAB's reputation			⇒
	Public Perception /Brand Risk	B58	Risk of <i>perceived</i> unfair procurement activities			⇒
		B59	Risk that complaints from clients, tenants, applicants, general public through MP/MPP office, or municipal councillor, Board Member, are not prevented or mitigated.			⇒
	Employee Misconduct	B60	Risk of misuse of social media platforms by staff, resulting in negative brand			⇒
	*Risk Exposure Legend				**Trajectory Legend	
Red	Immediate Focus/Action Required			Significant Increase	↑	
Gold	Focus on best practice improvement			Moderate Increase	↑	
Yellow	Monitor, with a view to best practice improvement			No Change	⇒	
Green	Monitor			Decrease	↓	
Blue	No action required					