



Government of **Western Australia**
Department of **Sport and Recreation**

WOODMAN POINT RECREATION CAMP

RISK MANAGEMENT PLAN

WOODMAN POINT RECREATION CAMP

Emergency Plan

Purpose

The purpose of this Risk Management Plan is to assist camp organisers with additional information that may aid in their planning and response to risks which may be encountered on site. Every facility and activity is different and unique. This plan does not purport to cover every situation but offers some ideas to supplement the planning undertaken by the camp leader/client prior to and during their stay.

Emergency Plan

This is not the Camp Emergency Response Plan. This document is available from the Camp or from dsr.wa.gov.au/campresources

First Aid

Clients are responsible for first aid at all times on site with their group except when 'Camp' staff members are running program activities. Clients are also responsible for supplying their own first aid kits. It is recommended that clients have at least one fully qualified First Aid Officer among their staff/leaders.

First Aid kits are located at the Camp Office and in the Program Storage Shed near beach entry point. In addition, the Senior Instructor for all programs at Woodman Point will have an "outdoor first aid kit" at the activity site.

DSR staff is qualified in first aid and holds a 'minimum' of a current "Senior First Aid Certificate." Most DSR staff hold higher level first aid qualifications.

WOODMAN POINT RECREATION CAMP

Risk Management Plan

OBJECTIVES

To assist Woodman Point Recreation Camp Staff in managing the daily risks at the Camp, by creating a positive attitude and commitment to perform all functions/operations in a reasonable and safe manner and to bring to the Recreation Camps and Reserve Board's attention any unsafe conditions that present themselves.

This document becomes an integral part of the "RISK MANAGEMENT MANUAL" of the Department of Sport and Recreation dated December 1998.

MEASUREMENT

The success of this Risk Management process depends on the support and endorsement of the Department of Sport and Recreation and will contribute to the Camp's 'bottom line' in the following ways:

- ◇ reduced 'lost time' and sick leave accidents
- ◇ reduce the contingency of loss
- ◇ reduce the level of risk
- ◇ lower the costs for workers compensation premiums
- ◇ cost saving to 'risk insurance'
- ◇ protection of assets
- ◇ can be used as a useful marketing tool
- ◇ guarantee's clients a safe and enjoyable experience

WHY HAVE A RISK MANAGEMENT PLAN

With a Risk Management Plan, the Camp will be taking a pro-active approach to managing risk and staff will project an attitude that says, **"..we have an obligation to permit users of the Camp to have quality recreation experiences in safe surroundings"**.

It is a philosophy that protects against undue risk and involves protection against dangerous staff practices. It is a planned program that minimises risk through professionally desirable practices and tells all clients, **"..Yes, we are knowledgeable professionals, we are concerned for your safety and we will do what is necessary to provide a safe environment for you to stay or recreate"**.

A secondary benefit for taking ones professional responsibility seriously is that in the event of legal action, a solid pro-active program shows 'intent'. A program of managing risk serves as a deterrent to being sued and, if sued, as evidence of 'intent' to act responsibly.

For a plan to be effective it becomes every staff member's responsibility. However, the constant effort of a key person is needed to assist, guide, train, motivate and consult with staff throughout the Camp to accomplish the Woodman Point Recreation Camp and the Department of Sport and Recreations objectives in a safe manner. This person will be the Manager of the Camp.

STEPS TO MANAGING RISK - WOODMAN POINT RECREATION CAMP

It is virtually impossible to design a plan comprehensive enough to serve all purposes. It would be foolhardy to think that if each step is followed precisely, there will be no tort liability.

At the Woodman Point Recreation Camp we will review all our current practices on a regular basis [at quarterly] and improve them wherever possible. All functions and activities at the Camp are looked at under the headings listed below and demonstrate a logical assessment process that clearly indicates our response to managing risk.

- ◇ Philosophy/Policy Statements
- ◇ Needs Assessment
- ◇ Goals and Objectives
- ◇ Site and Facility Development
- ◇ Program Development
- ◇ Supervision
- ◇ Establishment of Rules, Regulations and Procedures
- ◇ Safety Inspections and Investigations
- ◇ Accident Reporting and Analysis
- ◇ Emergency Procedures
- ◇ Release, Waivers, Agreements to Participants
- ◇ Woodman Point Recreation Camp Safety Committee Referral
- ◇ Camp Chain Safety Group Referral
- ◇ Department of Sport and Recreation Risk Management Committee Referral

WOODMAN POINT RECREATION CAMP SAFETY COMMITTEE

The Woodman Point Recreation Camp Safety Committee will meet a minimum of four times per annum [or as required] to discuss and identify any safety issues. These issues will be forwarded to the DSR Camps Chain Safety Group (CCSG).

The Committee will be made up of the Business Manager – Camps; Woodman Point Recreation Camp Manager, Operations Manager, Program Staff, Accommodation Officer and a representative from the Catering Contractor.

WOODMAN POINT RECREATION CAMP FORMS FOR USE IN RISK MANAGEMENT

- ◇ Risk Factors and Controls
- ◇ Qualitative Measures of Likelihood
- ◇ Qualitative Measures of Consequences or Impact
- ◇ Defining Levels of Existing Controls
- ◇ Public Liability arising from Woodman Point Recreation Camp Operations
- ◇ Professional Liability
- ◇ Directors and Officers Liability
- ◇ Workers Compensation
- ◇ Property
- ◇ Incident Report Form
- ◇ Risk Management Assessment Template
- ◇ Camp Chain Safety Group Minutes and Referrals

RISK ASSESSMENT AND MANAGEMENT

See the following Risk Management Assessment Sheets for individual assessment of risk at the Woodman Point Recreation Camp.

MANDATORY QUALIFICATIONS

FIRST AID: The Woodman Point Recreation Camp management strongly recommends that every camp has at least one first aid qualified person in attendance at all times.

Consequently the absolute minimum standard of medical expertise recommended on camp is a current **Senior First Aid** or equivalent. The camp organiser should check with the administration of their organisation to ensure that all policies and guidelines are enforced. It must be noted that these may be different to recommendations in this plan in which situation the highest standard should prevail.

HARNESSED ACTIVITIES: The camp conducts activities such as abseiling, climbing, leap of faith, high ropes elements, crate climb and flying fox. The minimum qualifications of an instructor to dispatch for these activities is National Outdoor Leaders Registration Scheme or competencies agreed by the Camps Chain Safety Group (CCSG), Senior First Aid, police clearance and in-camp accreditation.

Note: All Woodman Point staff and volunteers over 18 years of age hold a “National Police Clearance Certificate” plus a “Working with Children Check” as it applies to the Sport and Recreation sector. Copies of these documents are lodged with the Human Resources section at the Department of Sport and Recreation. In addition, staff members working on recreation programs carry the WWCC card at all times.

WATER SAFETY: The Woodman Point Recreation Camp management strongly recommends that every camp has at least one qualified Bronze Medallion holder (Surf Life) in attendance and control of every eight persons when in or near the water. It should be remembered that bronze certificates are current for 12 months only and unqualified persons should only be used as additional support.

The ratio of qualified supervisors to persons in the water varies between organisations from around 1:8 to 1:20 and is constantly being reviewed by most organisations. Surf Life Saving WA can be contacted for the latest information.

Water safety personnel should be dressed ready to respond to an emergency and should have a flotation rescue device near by. These may be obtained from the camp office.

The Woodman Point Recreation Camp programs conducted in the water such as surf life saving, surf ski paddling and raft building have bronze medallion qualified instructors or higher. The camp can also organise lifeguards to supervise any in-camp group.

Camp Phone Numbers

Camp Office 9492 9797 (0830 to 1730 hours)
Emergency Mobile 0414 448 088 (24 hour service)

Emergency Only Phone Numbers

Camp Manager 0434 363 714
Operations Manager 0401 823 308

Emergency Warden (client)

It is recommended that each client group using the Woodman Point Recreation Camp has at least one nominated person who is the central contact in any emergency.

Ideally this person will be trained in first aid and calm and decisive in an emergency.

RECOMMENDATION: that every group has at least one mature person nominated as Emergency Warden.

Some required equipment and information for the Emergency Warden are;

- first aid kit
- strong torch
- motor vehicle
- mobile phone
- lists of all personnel at camp and where they are accommodated
- medical forms for all personnel
- camp staff contact numbers
- a procedure to evacuate the entire group from the site as per the camp "Emergency Plan"

Emergency Actions

Every emergency will require different responses made under pressure on the spot. The actions listed here are intended as a guide only and should be used as a prompt for camp leaders when planning for their camp.

An emergency is when there is a real chance that death, serious injury or significant damage to property has occurred or may be imminent. Emergencies on camps usually require the management of large numbers of people in a variety of locations. They are stressful, require immediate important actions, may have a shock component and often have potential to quickly deteriorate.

DUTY OF CARE: Legally, camp organisers owe a duty of care to safeguard campers and those around them. Where the campers are minors this duty of care is increased. Coronial inquests have indicated that campers also need to be protected from witnessing serious injuries or other stressful scenes.

RECOMMENDATION: that all personnel who are not involved in an emergency action are removed safely and methodically from the area.

CAMP STAFF: The reporting of any emergency to Woodman Point staff should be done as soon as possible. This can be done by phone, radio or by dispatching a responsible person.

Staff are generally on site 24 hours, however from time to time there are periods when there are no staff on site.

The Camp Mobile phone number **0414 448 088** is listed in the contacts above. Camp staff should never be solely relied upon to implement emergency actions. It is presumed that 'urgency of the situation' will necessitate that the emergency warden or another camp organiser will encounter the emergency early in the incident and take control immediately. If and when Woodman Point staff arrive they may or may not take control.

EVACUATION: In an emergency where the response is to evacuate from the camp or part of the camp, some of the following points may be useful to consider;

- The Camp Manager and/or Emergency Warden should take charge where appropriate
- The on-site camp staff should be notified ASAP
- Commence evacuation as early as possible
- Keep evacuation orderly and free from panic
- The warden should ensure that mature persons effect the evacuation of individual areas and rally at the prearranged point. Eg. One teacher per dormitory
- The muster point is clearly identified prior to start of camp. (on the office front veranda)
- In most cases the rallying point will be the **muster point** or in the centre of the oval
- The rallying point can be altered if conditions dictate or an evacuation from the entire site is necessary. External rallying points are the Woodman Point beach
- The warden should ensure that everyone is accounted for and that every building and area is checked for lost, confused or asleep campers
- Particular care should be taken if motor vehicles are to be moved in an emergency situation. It is recommended that vehicles are not moved in a hurry in the same vicinity as campers.
- Consideration of weather conditions is important

IMPORTANT

The information described here regarding emergency response and evacuation is only a guide.

More detailed and current Emergency Response information for Woodman Point Recreation Camp can be found in the document titled:

“Woodman Point Emergency Response Plan”



THE FOLLOWING PAGES CONTAIN RISK MANAGEMENT ASSESSMENT SHEETS FOR EMERGENCIES AND ALSO FOR INDIVIDUAL PROGRAM ACTIVITIES OFFERED AT THE CAMP

WOODMAN POINT RECREATION CAMP RISK MANAGEMENT - FIRE AT CAMP

Division: Regions and Facilities

<p>PROJECT: Describe the activity/ function/ strategy.</p>	<p>Fire at the grounds or buildings or on adjoining Woodman Point Regional Park and other public open space.</p>
<p>THE RISK: What can happen?</p> <p>How can it happen?</p>	<p>Fire can burn buildings or trees at the Camp. People could get burnt or suffer smoke inhalation</p> <p>Vandalism or deliberately lit fires. Electrical fault in buildings. [Smoke Detectors installed]</p>
<p>CONTROLS: What controls will be used in this activity?</p> <p>q Excellent q Adequate q Inadequate</p>	<p>Excellent</p> <p>The Camp has 'hard-wired' smoke detectors in all buildings, the Camp has regulation firebreaks, and the Camp has outstanding fire fighting support from the DEC office on Cockburn Road. In addition the camp has six 75 mm water mains, all fire extinguishers are regularly serviced and maintained, the Camp has a fire evacuation drill in place and all leaders of groups are briefed on what to do in case of a fire.</p>
<p>LIKELIHOOD: What is the likelihood of this event occurring? PTO: to rate, see Table D1</p>	<p>Likely</p>
<p>CONSEQUENCES: What would be the consequences if the event occurred? PTO: to rate, see Table D2</p>	<p>Moderate</p>
<p>LEVEL OF RISK: What is the level of risk? PTO: to rate, see Table D3</p>	<p>Significant Risk</p>

Action required:



WOODMAN POINT RECREATION CAMP RISK MANAGEMENT - KITCHEN HEALTH & SAFETY

Division: Regions and Facilities

<p>PROJECT: Describe the activity/ function/ strategy.</p>	<p>Kitchen health and safety</p>
<p>THE RISK: What can happen?</p> <p>How can it happen?</p>	<p>Food poisoning Cuts and abrasions Burns</p> <p>Unhealthy practices, lack of care, not applying OH&S practices.</p>
<p>CONTROLS: What controls will be used in this activity?</p> <p>q Excellent q Adequate q Inadequate</p>	<p>Excellent</p> <p>All kitchen staff are trained in food handling practices and checked on regularly by City of Cockburn Health Inspectors, Kitchen checked on by City of Cockburn Health Inspectors and Woodman Point Recreation Camp Management, First Aid Kit in Kitchen, Fire blankets in kitchen, adequate numbers of staff employed, kitchen cleaned after each meal.</p>
<p>LIKELIHOOD: What is the likelihood of this event occurring? PTO: to rate, see Table D1</p>	<p>Unlikely</p>
<p>CONSEQUENCES: What would be the consequences if the event occurred? PTO: to rate, see Table D2</p>	<p>Moderate</p>
<p>LEVEL OF RISK: What is the level of risk? PTO: to rate, see Table D3</p>	<p>Medium Risk</p>

Action required:



WOODMAN POINT RECREATION CAMP RISK MANAGEMENT - DAMAGE TO CLIENT VEHICLES

Division: Regions and Facilities

<p>PROJECT: Describe the activity/ function/ strategy.</p>	<p>Damage to clients vehicles</p>
<p>THE RISK: What can happen? How can it happen?</p>	<p>Vandalism, motor accidents, tree branch damage</p>
<p>CONTROLS: What controls will be used in this activity? q Excellent q Adequate q Inadequate</p>	<p>Excellent Manager lives on site, Camp has security system in some buildings, City of Cockburn security patrol and local police regularly patrol the camp and surrounding park lands, trees pruned regularly. Security access gate at main entry, and pedestrian gates locked at all times.</p>
<p>LIKELIHOOD: What is the likelihood of this event occurring? PTO: to rate, see Table D1</p>	<p>Rare</p>
<p>CONSEQUENCES: What would be the consequences if the event occurred? PTO: to rate, see Table D2</p>	<p>Minor</p>
<p>LEVEL OF RISK: What is the level of risk? PTO: to rate, see Table D3</p>	<p>Low Risk</p>

Action required:



WOODMAN POINT RECREATION CAMP RISK MANAGEMENT - ABSEILING

Division: Regions and Facilities

<p>PROJECT: Describe the activity/ function/ strategy.</p>	<p>Abseiling in the Adventure Training Centre (ATC) Woodman Point Recreation Camp, 74 O'Kane Court, MUNSTER WA 6166</p>
<p>THE RISK: What can happen? How can it happen?</p>	<p>Major fall from platforms @ 5 metres and 9 metres height Cuts and bruises Person could fall from tower while waiting to abseil Person could slip and receive cuts or bruises/abrasions on metal parts of tower Person could land awkwardly and damage bone structures</p>
<p>CONTROLS: What controls will be used in this activity? q Excellent q Adequate q Inadequate</p>	<p>Excellent Highly qualified instructors, intensive safety briefing before and during activity, adhere to industry safety standards, only top quality approved equipment is used, all equipment is 'logged' and has a 'use-by' date, ATC is purpose designed platforms are checked yearly by qualified Engineer, ratio of 1 instructor to 8 participants adhered to, belay system used at all times, all participants on platforms clipped into safety line at top of platforms, all participants are belayed from ground to platforms.</p>
<p>LIKELIHOOD: What is the likelihood of this event occurring? PTO: to rate, see Table D1</p>	<p>Rare</p>
<p>CONSEQUENCES: What would be the consequences if the event occurred? PTO: to rate, see Table D2</p>	<p>Major</p>
<p>LEVEL OF RISK: What is the level of risk? PTO: to rate, see Table D3</p>	<p>Medium Risk</p>

Action required:



WOODMAN POINT RECREATION CAMP RISK MANAGEMENT - FLYING FOX ACTIVITY FROM THE ADVENTURE TRAINING CENTRE

Division: Regions and Facilities

<p>PROJECT: Describe the activity/ function/ strategy.</p>	<p>Flying Fox Two Flying foxes of 100 metres length and approx 9 metres from ground for the first 30 metres thereafter, 3 metres from ground to end point.</p>
<p>THE RISK: What can happen?</p> <p>How can it happen?</p>	<p>Person falls to ground [maximum of 9 metres].</p> <p>Equipment or cable could fail and person fall to ground.</p>
<p>CONTROLS: What controls will be used in this activity?</p> <p>q Excellent q Adequate q Inadequate</p>	<p>Excellent</p> <p>Highly qualified instructors, intensive safety briefing before and during activity, adhere to industry safety standards, only top quality approved equipment is used, all equipment is 'logged' and has a 'use-by' date, facility is purpose designed, cable is checked before each activity day.</p>
<p>LIKELIHOOD: What is the likelihood of this event occurring? PTO: to rate, see Table D1</p>	<p>Rare</p>
<p>CONSEQUENCES: What would be the consequences if the event occurred? PTO: to rate, see Table D2</p>	<p>Minor</p>
<p>LEVEL OF RISK: What is the level of risk? PTO: to rate, see Table D3</p>	<p>Low Risk</p>

Action required:



WOODMAN POINT RECREATION CAMP RISK MANAGEMENT INITIATIVE GAMES, SEARCH & RESCUE, ESCAPE FROM QUARANTINE

Division: Regions and Facilities

<p>PROJECT: Describe the activity/ function/ strategy.</p>	<p>Team Building Games Initiative games, problem solving games, team games, 'scenario' type games where teamwork and cooperation is required.</p>
<p>THE RISK: What can happen?</p> <p>How can it happen?</p>	<p>Minor injuries can occur</p> <p>People falling from low heights, letting go whilst on swings, tripping over bush, slipping over, running through spider webs in bush</p>
<p>CONTROLS: What controls will be used in this activity?</p> <p>q Excellent q Adequate q Inadequate</p>	<p>Excellent</p> <p>Thorough briefings as per industry standards, staff assess participants for suitability to achieve task without mishap, many relevant books written and held in Department Information Centre for reference, staff briefed by Manager before each program and teaching points discussed. Check Lists and activity standards in place.</p>
<p>LIKELIHOOD: What is the likelihood of this event occurring? PTO: to rate, see Table D1</p>	<p>Rare</p>
<p>CONSEQUENCES: What would be the consequences if the event occurred? PTO: to rate, see Table D2</p>	<p>Minor</p>
<p>LEVEL OF RISK: What is the level of risk? PTO: to rate, see Table D3</p>	<p>Low Risk</p>

Action required:



WOODMAN POINT RECREATION CAMP RISK MANAGEMENT LOW ROPES IN ADVENTURE TRAINING CENTRE

Division: Regions and Facilities

<p>PROJECT: Describe the activity/ function/ strategy.</p>	<p>Low ropes activity</p>
<p>THE RISK: What can happen?</p> <p>How can it happen?</p>	<p>Minor injuries such as abrasions from steel cable and possibly back and neck injuries</p> <p>Participant could fall off the cable and hurt themselves</p>
<p>CONTROLS: What controls will be used in this activity?</p> <p>q Excellent q Adequate q Inadequate</p>	<p>Excellent</p> <p>Thorough briefing by staff, use of 'spotters' [people supporting others from falling off cable], cables checked prior to each activity, course only 400 mm from ground at highest point, many reference books available in Department Information Centre, regular staff discussions and de-briefing after each event. Highly qualified staff.</p>
<p>LIKELIHOOD: What is the likelihood of this event occurring? PTO: to rate, see Table D1</p>	<p>Rare</p>
<p>CONSEQUENCES: What would be the consequences if the event occurred? PTO: to rate, see Table D2</p>	<p>Minor</p>
<p>LEVEL OF RISK: What is the level of risk? PTO: to rate, see Table D3</p>	<p>Low Risk</p>

Action required:



WOODMAN POINT RECREATION CAMP RISK MANAGEMENT LEAP OF FAITH LOCATED IN ADVENTURE TRAINING CENTRE

Division: Regions and Facilities

<p>PROJECT: Describe the activity/ function/ strategy.</p>	<p>“Leap of Faith”</p> <p>Participants are belayed to the 9 metre platform in full body harness and helmet. Participant will then leap towards a trapeze bar whilst on an approved belay system</p>
<p>THE RISK: What can happen?</p> <p>How can it happen?</p>	<p>Major injuries could be caused by up to 9 metre fall if belay system failed</p> <p>Equipment or cabling could fail whilst activity in progress</p>
<p>CONTROLS: What controls will be used in this activity?</p> <p>q Excellent q Adequate q Inadequate</p>	<p>Excellent</p> <p>Highly qualified instructors, intensive safety briefing before and during activity, adhere to industry safety standards, only top quality approved equipment is used, all equipment is 'logged' and has a 'use-by' date, facility is purpose designed, facility is checked before each activity, belay system used at all times, all participants on leap of faith are belayed at all times.</p>
<p>LIKELIHOOD: What is the likelihood of this event occurring? PTO: to rate, see Table D1</p>	<p>Rare</p>
<p>CONSEQUENCES: What would be the consequences if the event occurred? PTO: to rate, see Table D2</p>	<p>Major</p>
<p>LEVEL OF RISK: What is the level of risk? PTO: to rate, see Table D3</p>	<p>Medium Risk</p>

Action required:



WOODMAN POINT RECREATION CAMP RISK MANAGEMENT BEACH BASED (DSR ORGANISED ACTIVITIES) – PADDLING, RAFT BUILDING, SURF LIFE SAVING & BEACH GAMES

Division: Regions and Facilities

<p>PROJECT: Describe the activity/ function/ strategy.</p>	<p>Beach Based Recreation</p> <p>Recreation events involving the use of the ocean on Woodman Point private beach such as paddling, surf life saving, raft building and beach games.</p>
<p>THE RISK: What can happen?</p> <p>How can it happen?</p>	<p>Drowning, sunburn, cuts and abrasions, jelly fish stings</p> <p>Weak swimmers, inattentive instructors, people getting out of depth, not applying sunscreen, broken glass or sharp objects in water or on beach, jellyfish in vicinity.</p>
<p>CONTROLS: What controls will be used in this activity?</p> <p>q Excellent q Adequate q Inadequate</p>	<p>Excellent</p> <p>Highly qualified instructors. All instructors hold as a 'minimum standard' a "Bronze Medallion' Certificate in Water Safety, thorough briefing, exact definition of boundaries to be used by buoys or flags, only use shallow areas of water for activities. Rescue craft in place. Correct ratio's as per Department of Education and Training and DSR guidelines used at all times.</p>
<p>LIKELIHOOD: What is the likelihood of this event occurring? PTO: to rate, see Table D1</p>	<p>Unlikely</p>
<p>CONSEQUENCES: What would be the consequences if the event occurred? PTO: to rate, see Table D2</p>	<p>Minor</p>
<p>LEVEL OF RISK: What is the level of risk? PTO: to rate, see Table D3</p>	<p>Low Risk</p>

Action required:



WOODMAN POINT RECREATION CAMP RISK MANAGEMENT
FREE SWIMMING AT THE BEACH
Division: Regions and Facilities

<p>PROJECT: Describe the activity/ function/ strategy.</p>	<p>Swimming at the Woodman Point private beach. Note: When Woodman Point Recreation Camp staff are running water-based programs the responsibility for participant supervision is with DSR. At all other times when participants are in the camp the group itself is responsible for water supervision. i.e. a school camp leader is responsible for student supervision when using the beach unless DSR staff members are running an official DSR camp program.</p>
<p>THE RISK: What can happen? How can it happen?</p>	<p>Drowning Unconscious person Diving accident Sunburn Cuts and abrasions Inattentive group leaders Sky larking by participants</p>
<p>CONTROLS: What controls will be used in this activity? q Excellent q Adequate q Inadequate</p>	<p>EXCELLENT When using the beach at the Camp for DSR supervised programs, team building or recreation purposes all instructors hold "Bronze Medallion' Certificate in Water Safety and/or 'Aquatic Rescue Qualification'.</p>
<p>LIKELIHOOD: What is the likelihood of this event occurring? PTO: to rate, see Table D1</p>	<p>Rare</p>
<p>CONSEQUENCES: What would be the consequences if the event occurred? PTO: to rate, see Table D2</p>	<p>Moderate</p>
<p>LEVEL OF RISK: What is the level of risk? PTO: to rate, see Table D3</p>	<p>Medium Risk</p>

Action required: