



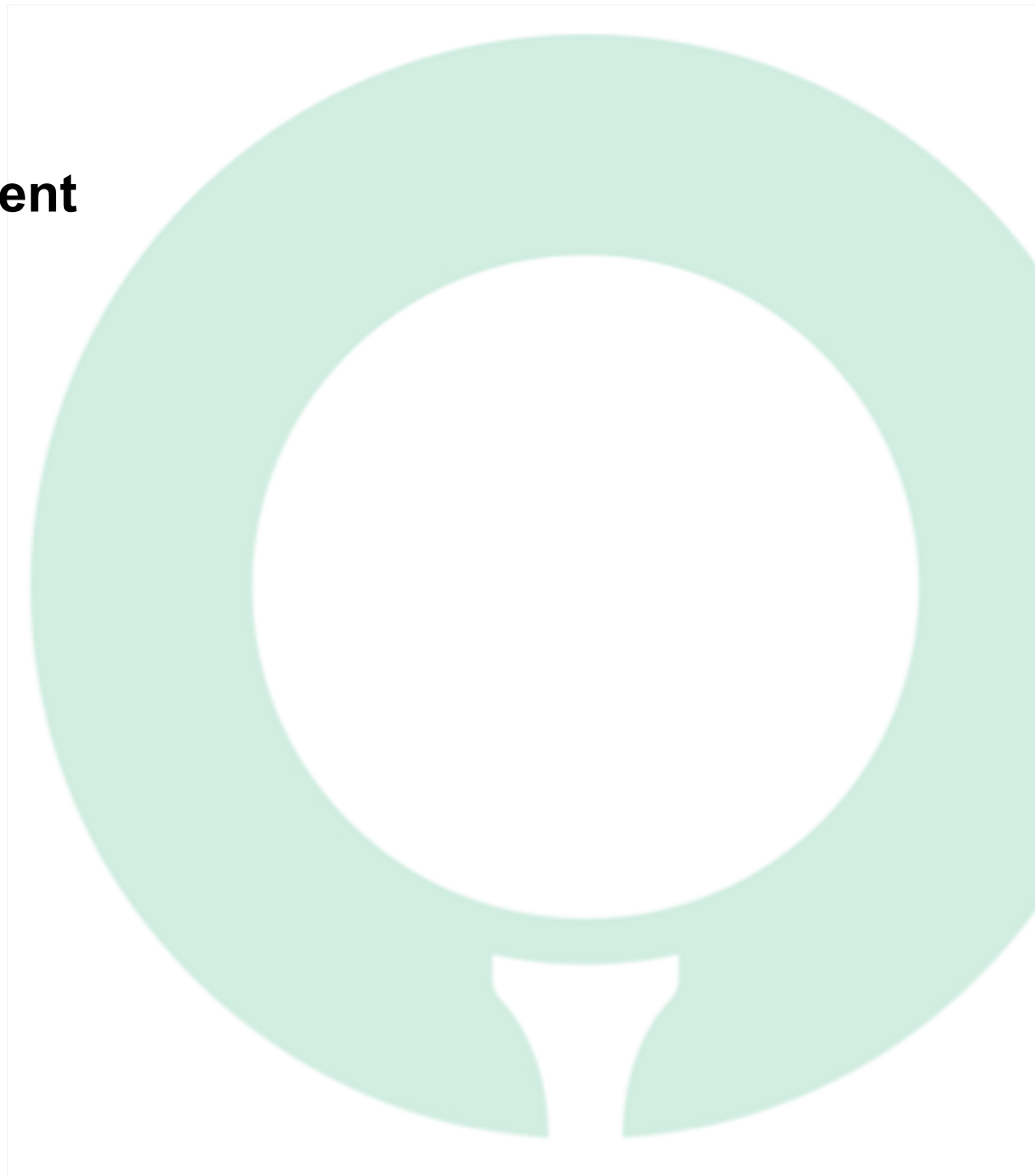
# GEO Certification Risk Assessment

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Document to be reviewed annually



The objective of this risk assessment is to identify the risk level of GEO management practices and assurance system. Listed out in the Risk Register are potential scenarios that could negatively affect the credibility of GEO's Assurance Management Systems (AMS) under current management processes. Identified scenarios are observed through the risk matrix to identify risk level based on predicted likelihood and level of consequences with approximate dates of risk identification and an estimated timeline for mitigation. Moreover, each risk is assigned to either GEO Foundation or GEO Certification Ltd as being the primary group responsibility for its mitigation. This risk assessment will assist GEO in determining the best course of action based on risk tolerance and strategies. If GEO concludes that the proposed solution should be adopted, then the risk assessment will be used to form guidelines and processes that address identified risks.

Impact of risk							
Probability of occurrence →		Frequent	Likely	Occasional	Seldom	Unlikely	Unknown
Consequences		A	B	C	D	E	0
Catastrophic	1	Extremely High	Extremely High	High	High	Medium	Unknown
Critical	2	Extremely High	High	High	Medium	Low	Unknown
Moderate	3	High	Medium	Medium	Low	Low	Unknown
Negligible	4	Medium	Low	Low	Low	Low	Unknown
Unknown	0	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

Risk Register	Date (Version)	Consequence	Likelihood	Rating	Strategies for Mitigating / reducing risks	Target Mitigation Date
Client choosing which verifier (i.e. certification auditor) to pay for an objective verification creates a conflict of Interest	May 2019 (v4)	Moderate	Occasional	C3: Medium	There is a strict policy that a client cannot choose a verifier if the verifier has consulted the client in the previous 3 years. It is firmly implemented and risks to verifier and clubs' reputation somewhat mitigates. The Peer-review process and possibility of appointing a second verifier to complete an on-site audit / shadow audit is possible in some emerging economies.	Q4 2023
Fraudulent payment by club to verifier on certification decision	May 2020 (v5)	Critical	Unknown	O2: Unknown	The verifier only 'recommends' a certain status (certified/pending/not) with GEO Cert Ltd. taking the final decision, if required through further investigation. Peer reviews also help mitigate this risk.	Ongoing
GEO Cert Ltd.'s role in selection, training, and evaluation of verifiers decreases credibility among stakeholders	August 2016 (v1)	Critical	Unknown	O2: Unknown	The public directory of GEO certifiers, which clubs they have certified and when somewhat mitigates this. Peer reviews do help with calibration and will highlight any questions as to a verifier's capabilities, as well as the golf facility survey filled out after each verification. We could look into making these public and/or the example Code of Conduct signed by all verifier's public. GEO Cert. Ltd will explore the possibility of an external body providing on-going training and testing of verifiers and the oversight.	Q3 2022
Club payment of verification fee prior to audit influences verifier recommendation	May 2019 (v4)	Critical	Unknown	O2: Unknown	Verifier only recommends. Perhaps payment being made after is a bigger risk to verifiers not being paid and a break-down in the system. Peer reviews and clear decision-making procedures also provide reassurance to clients on the integrity of the system.	Q4 2023
Auditor does not visit all areas of site	June 2018 (v3)	Moderate	Occasional	C3: Medium	The recruitment, training, and expectations of 'duty of care' by the verifiers – as signed in the Code of Conduct (CoC) agreement protects against this type of issue. Peer reviews help to ensure consistency between	Ongoing

Verification report translator potentially unknown leading to doubts around accuracy.	April 2021 (v6)	Moderate	Occasional	C3: Medium	<p>The CoC states, "Ensure any translation of audit reports is undertaken by individuals independent of the golf facility applying for certification. If this is not possible the name of the individual responsible for the translation will be disclosed within the certification / verification material." More succinct reporting will reduce risk of errors in translation.</p> <p>The new OnCourse programme has a stronger balance around qualitative and quantitative inputs, which when cross-checked will enable any inaccuracies to be more easily and robustly identified.</p>	Q3 2022
Lack of a randomized selection process encourages verifier self-promotion activities that create a conflict of interest and reduce their standing as objective verifiers.	May 2019 (v4)	Moderate	Occasional	C3: Medium	<p>This presents a high reputational risk for the individual verifiers. The feedback in the system, such as peer-reviews will highlight issues, as well as the transparent reporting/publishing of reports on GEO's website. The survey and feedback forms would also highlight any issues with this (and act as a deterrent).</p>	Q4 2023
Employees of verifier writing verification reports but signing off as verifier's own work.	June 2018 (v3)	Moderate	Occasional	C3: Medium	<p>Again, the reputational risk for the verifier is high here. Peer reviews and GEO Cert Ltd. reviews of all documents safeguard.</p> <p>The CoC states, "Not outsource to another organisation or individual, parts or all any activity related to certification, verification, reporting and auditing of the audit or certification reporting."</p>	Ongoing
GEO is disconnected from gaining an in-depth understanding of regional trends. Lack of an in-depth understanding prevents region from operating as efficiently as may otherwise be possible.	May 2020 (v5)	Negligible	Unknown	O4: Unknown	<p>OCv4 has more robust data input, regionalisation, and reporting functionalities, which is a strong motivation for the upgrade.</p> <p>GEO Foundation member of staff for specific overview of facility data, carbon reporting and regional, national benchmarking.</p>	Ongoing

Verifier influenced by desire to satisfy applicant	August 2016 (v1)	Moderate	Occasional	C3: Medium	Peer reviews, oversight mechanisms, GEO Cert. Ltd making final decision and trends analysis help mitigate this risk. The training of the verifier in the spirit of the system – blend of immediate and continuous improvement, and the verifiers' professional backgrounds (among the eligibility criteria) help to mitigate this. Policy of 3 consecutive verifications before a change must occur. GEO Cert Ltd has final say on who acts as verifier – facilities must contact GEO for approval before proceeding with verification step.	Q3 2022
Competition (advisory / support roles) between verifier within countries allows for biased verifications and derogatory messaging to reach clubs	May 2019 (v4)	Critical	Seldom	D2: Medium	Transparency, surveys, complaints & appeals and communications to the verifier network help mitigate this risk. The risk to the whole system reduces the likelihood of this occurring.	Ongoing
Conflicts of Interest between verifier and applicant self-reported so cannot be easily fully checked.	April 2021 (v6)	Critical	Occasional	B2: High	Monitoring/surveillance, as well as the small community of verifiers reduces this risk. All reports with names and dates of verification/certification are publicly available.	Ongoing
Lack of clarity in governance structure if dispute were to arise	August 2016 (v1)	Moderate	Seldom	D3: Low	Complaints and Appeals procedure is transparent and publicly available.	Q1 2022
De-centralized process reduces clarity on what entity is responsible for what activity. This increased complexity could create confusion from client's perspective as well as other stakeholder's perspective.	April 2021 (v6)	Moderate	Likely	B3: Medium	Through regionalisation plans, this will be further reduced. Currently all processes and procedures are available publicly (as schema/images as well as text) to maximise clarity.	Q2 2024
Decrease in perceived impartiality as verifiers may also engage in industry advocacy,	July 2017 (v2)	Critical	Likely	B2: High	Transparency combined with application of clear verifier selection / conflict of interest rules reduce this.	Ongoing

advisory and education activities.						
Golf associations funding of support / advisory roles for verifier creates conflict of interest	July 2017 (v2)	Moderate	Seldom	B3: Medium	Transparency and communication reduce this. Research and advisory projects must be well defined and time-bound to ensure any conflicts of interest are reduced.	Ongoing
In areas with few verifiers - Client freedom of choice limited (or additional high costs for flying in auditor from other region).	August 2016 (v1)	Unknown	Unlikely	Unknown	The verifier network is growing. The regionalisation strategy will help support this growth through national growth plans being aligned with recruitment plans. Remote verification is an option for some low-risk facilities.	Ongoing
Difficulty in sourcing verifiers with suitable experience / qualification lowers the verifier network quality.	August 2016 (v1)	Moderate	Seldom	B3: Medium	Training plans and peer-reviews ensure any issues around performance of verifiers is identified and rectified quickly. There is a wait list in operation and not all applicants accepted into verifier network. Ecological / landscape experience has proved the most important area, so this is prioritised among applicants.	Q3 2022
Consistency of evaluation at re-certification stage must be strengthened.	June 2018 (v3)	Moderate	Frequent	B2: High	That a verifier can recertify helps avoid this risk. It helps with cross-checking and continuity. New improved reporting format reduces variance across different verifiers and at different stages of certification life cycle.	Ongoing
Relationship develops between club and GEO Cert Ltd staff resulting in reduced impartiality.	August 2016 (v1)	Critical	Occasional	B2: High	Internally monitored through policies, staff appraisal, certification-decision-making process and governance structures. This will be reduced with increased staffing. This is reduced somewhat with the 'automation' and facilitated cross-checking that OCv4 will provide (e.g. qualitative/quantitative data and outside data source calibration/comparison). GEO Foundation member of staff for specific overview of facility data, carbon reporting and regional, national benchmarking.	Ongoing

Enterprise is forewarned of the audit so covers-up any potential non-compliances.	July 2017 (v2)	Critical	Occasional	B2: High	A comprehensive verification process will reduce this. Spot / random checks are possible, and clubs are informed of this.	Ongoing
Remote verification does not allow comprehensive audit of facilities and infrastructure.	May 2019 (v4)	Moderate	Occasional	C3: Medium	Risk to reputation of both verifier and facility. Reports made public on certification with transparent cross-referencing of each criteria point in the standard. Images and documentary evidence from facility also available to GEO Cert Ltd. Spot / random checks possible. Remote verification eligibility criteria developed by GEO and approved by national associations.	Q4 2023
Degree of separation of GEO Foundation from GEO Certification Ltd from deeper levels of overall industry engagement	August 2016 (v1)	Critical	Likely (Increasing)	B2: High	We have started a course of concerted action to formally review our oversight structure for the GEO system in light of further system uptake and integration into the industry, combined with demand for other GEO services, tools and activities. We have been monitoring this closely over recent years and now, in preparation for what we see as likely demand for GEO to provide a greater range and depth of catalytic work to accelerate sustainability in and through golf, we are laying out more concrete plans for next phase. This includes defining other oversight mechanisms, structures and processes and direct liaison with potential third-party entities to administer and oversee key components.	Q3 2023

\*Note: Those risks identified in **Blue** will primarily be the responsibility of GEO Foundation, while those identified in **Green** will be the responsibility of GEO Certification Ltd