



ID	RBS	Title	Owner	Current	Residual	Notes
494 []	R3	Donations compliance checks (PPERA eligibility + thresholds)	Winter, David	12	8	Donation/membership pages already publish the rules and reserve the right not to accept donations. The operational controls and audit trail still need to be formalised as a consistent system.
495 []	M3	Membership acceptance/termination decisions lack consistent governance	Winter, David	9	6	Rules exist in published terms; the governance mechanism (decision rights, records, comms templates, and review) is not yet evidenced as a mature system.
496 []	C3	Auto-renewal, cancellation, and refund handling creates avoidable disputes	Winter, David	9	6	The terms define the rule; operational steps, SLAs, tracking, and evidence trail need to be implemented and monitored.
497 []	M2	Personal data governance across NationBuilder and third parties is a hotspot	Winter, David	9	6	High-level commitments exist in the published policy; internal operational controls and evidence (registers, owners, checks) must be established.
498 []	M3	Cookie consent and tracking controls may not match stated policy	Winter, David	9	6	Policy outlines intent; implementation and completeness (banner behaviour, documentation, governance checks) must be validated and maintained.
499 []	M3	Whistleblowing channel misuse and unsafe submissions	Winter, David	16	12	Public guidance exists; internal triage, staff training, evidence handling SOPs, and escalation points must be operationalised.
500 []		Legal-risk disclosures (Official Secrets / confidentiality) overwhelm capability	Winter, David			Boundaries are stated publicly; internal steps for triage, legal escalation, and decision recording need definition and rehearsal.
501 []		Whistleblower rights and complaints logging must be evidence-driven	Winter, David			Policy commitments are written; operational tooling (registers, owners, SOP, review cadence) must be implemented and used consistently.
502 []		FOI suggestion triage and delivery pipeline lacks end-to-end controls	Winter, David			Public-facing process is described; internal trackers, roles, SLAs, and reporting rhythm must be established for scale.
503 []		FOI publication and redaction governance is insufficient	Winter, David			Intent is stated; publication controls (review gates, redaction standards, approvals, and audit trail) must be operationalised.
504 []		Third-party intake tools introduce cross-border processing complexity	Winter, David			Risk is acknowledged in policy; operational assurance (contracts, supplier register, periodic checks) must be maintained as tools evolve.

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505 []	Policy publication cadence outpaces governance controls	Winter, David			Policy pages exist and are expanding; governance routines need formalising as a repeatable system with defined roles and gates.