

**Kirklees Council Risk Management Framework:**

**Risk Appetite Statement**

**September 2025**

DRAFT

## Introduction

Effective and meaningful risk management is about taking a balanced view to managing opportunity and risk. The council recognises that it must take risks to achieve its objectives and deliver beneficial outcomes to its stakeholders. This Risk Appetite Statement helps the council to identify the degree of risk that it is willing to take, to support delivery of our Corporate Plan and Priorities.

This document:

- Establishes definitions
- Provides a summary of the current assessment of the council's risk appetite
- Records a narrative rationale for each of the elemental appetites

By doing so, this document describes the level of risk that Kirklees Council is prepared to tolerate, or accept, in pursuit of its strategic objectives and key priorities.

## Why we need to understand risk appetite

Understanding risk enables an organisation to make informed management decisions. If risk appetite is not understood then this will lead to inconsistent risk taking in decision making, in some cases exposing the organisation to a risk it cannot tolerate; and in others adopting an overly cautious approach thereby limiting benefits and opportunities.

If officers and members do not know the levels of risk that are legitimate for them to take, or do not take important opportunities when they arise, then service improvements may be compromised and service user outcomes affected.

As the Governments Finance Function Risk Appetite Guidance Note says:

*“Public sector organisations cannot be culturally risk averse and be successful...an organisation’s risk management framework harnesses the activities that identify and manage uncertainty, allows it to take opportunities and to take managed risks not simply to avoid them, and systematically anticipates and prepares successful responses. **A key consideration in balancing risks and opportunities, supporting informed decision-making and preparing tailored responses is the conscious and dynamic determination of the organisation’s risk appetite**”*

The benefits of adopting a risk appetite include:

- Acts to assist informed decision making by ensuring the boundaries of risk taking have been set and understood
- Reducing uncertainty
- Improving consistency across governance mechanisms and decision-making
- Helps to determine organisational priorities and enables management time to be focussed accordingly
- Informing spending review and resource allocation processes
- Assisting to align risk taking with the capacity of the organisation to manage anticipated threats and opportunities
- Communicating desired boundaries, it enables and supports delegated decision making and work with partner organisations.

## **Guidance, not rules**

This document provides guidance – not rules – to consider when assessing the nature and extent of risks associated with specific proposals or courses of action. Examples of operating within risk appetite are included in the detailed text that follows (“What does this look like in practice?”) however, these cannot consider every eventuality so should be used as a prompt, and not a checklist.

**Whilst this is a tool to aid corporate decision making, it is expected that there will be decisions that are proposed and / or agreed outside of risk appetite and the organisation has a degree of ‘risk tolerance’ for these decisions. In these cases, it is important that we recognise and record that a deliberate and informed choice has been made to operate outside of risk appetite.**

Both senior officers and members should therefore consider this guidance when developing, recommending and determining changes to operating policy or practice.

## **Review frequency**

Risk Appetites do not fluctuate significantly and should be viewed as having a medium-term outlook. The Risk Appetite Statement therefore will be subject to review on a three yearly basis which will consider:

- An assessment of the organisations alignment to its agreed Risk Appetite
- Proposed changes to Risk Appetite

It should be noted that there may be occasions where an event or circumstance leads to a decision to revise an appetite outside of this process.

## **Operational governance**

For formal decisions there is an expectation that all reports (for Council, Cabinet or delegated decisions) reference the risks that are introduced or mitigated by recommendations contained within. Reports should identify and describe those risks, cite appetite, and the additional mitigations required where a proposed action is outside of the risk appetite position recorded in this document.

More broadly it is expected that at Strategic or Service directorate level there will be processes in place to assess the councils operation that are outside of the stated appetites (established by this document- or a specific decision to vary the appetite), and for these to be subject to appropriate management decision, recording and oversight.

Whilst the corporate risk team are available to advise, the operations of these processes should be established by an operated by Directorate or Service management teams.

## Summary

| Risk category                   | Averse | Cautious | Balanced | Open | Eager |
|---------------------------------|--------|----------|----------|------|-------|
| Legal, Regulatory & Compliance* |        |          |          |      |       |
| Information & Data              |        |          |          |      |       |
| Safeguarding                    |        |          |          |      |       |
| Safety & Security               |        |          |          |      |       |
| Financial Management            |        |          |          |      |       |
| Operational & Service Delivery  |        |          |          |      |       |
| People & Culture                |        |          |          |      |       |
| Environmental Sustainability    |        |          |          |      |       |
| Innovation & Change             |        |          |          |      |       |
| Physical Assets                 |        |          |          |      |       |
| Reputational                    |        |          |          |      |       |
| Third Party                     |        |          |          |      |       |

\* Legal, Regulatory & Compliance requirements are prioritised across all risk categories.

## Risk Appetite Levels

| Risk Appetite | Description  |
|---------------|--|
| Averse (1)    | Avoidance of risk and uncertainty is a key objective. Minimal exposure to risk is expected. Activities will only be those considered to carry virtually no inherent risk.  |
| Cautious (2)  | Preference for what are deemed to be 'safe' delivery options where there is a low degree of inherent risk. Activities will only be undertaken where they have a low degree of inherent risk.                                     |
| Balanced (3)  | Consideration of all potential options and acceptance that a level of risk may remain. Robust controls can be put in place to reduce the residual risk exposure.   |
| Open (4)      | Seek to achieve balance between a high likelihood of successful delivery and a high degree of benefit and value for money. Although mitigations will be used where practical, a higher residual risk exposure will be tolerated. |
| Eager (5)     | An area where the opportunity for greater rewards and benefit can be exploited, even if those activities carry a high degree of uncertainty of achieving target outcomes.  |

## Safeguarding:

### Risk description:

Risks arising from not meeting our legal obligations to protect children, young people and vulnerable adults, as a result of a failure to ensure safeguarding risks are minimised through policy, process design and / or to effectively identify and address concerns raised.

| Risk category | Averse | Cautious | Balanced | Open | Eager |
|---------------|--------|----------|----------|------|-------|
| Safeguarding  |        |          |          |      |       |

### Risk appetite assessment:

The council has a legal duty to safeguard children, young people and vulnerable adults. To this end Kirklees Council will put in place appropriate training, guidance and escalation approaches to ensure our most vulnerable residents are safeguarded effectively. Given these obligations the council has a **cautious** appetite for risks to ensure wherever possible we prevent death, serious injury or harm. We recognise that alternative service delivery approaches require safeguarding risks to be understood and mitigated, however these should not be used as a barrier to being creative and innovative in our approach.

### What does this look like in practice?

- Effective quality assurance approach to ensure leaders and managers have a line of sight to the safety and effectiveness of practice and, where required, what steps are being taken to improve our performance.
- Recognition that safeguarding risks cannot be managed in isolation and a multi-agency approach is required supported by intentional and effective partnership working.
- Regular, high-quality training embedded within a culture of continuous learning, recognising that both the nature of safeguarding concerns, and strategies that we use to respond are dynamic and will change over time
- A supportive and risk aware culture that encourages identification and escalation of concerns by all with consideration of safeguarding risk in all relevant decisions
- Actively seeking opportunities to invest in preventative services and community support

## Legal, Regulatory & Compliance:

### Risk description:

Risks associated with maintaining adherence to all relevant regulation and legislation.

| Risk category                  | Averse | Cautious | Balanced | Open | Eager |
|--------------------------------|--------|----------|----------|------|-------|
| Legal, Regulatory & Compliance |        |          |          |      |       |

### Risk appetite assessment:

The council has a **cautious** appetite for legal, regulatory and compliance risk, with the expectation that all relevant laws and regulatory requirements are adhered to at all times. Given the diverse nature of the services provided by the council it is subject to a wide range of legal and regulatory requirements generally, such as employment law, data protection, procurement regulations, safeguarding and specific duty related regulation as a vehicle operator, construction services provider, landlord etc... Some of these requirements are overseen by regulatory bodies such as the CQC, RSH, OFSTED, ICO. Major failures can result in serious harm, reputational damage to the council, government intervention and significant fines. However, the council should remain aware of the propensity to exceed requirements, as value for money obligations and resource constraints make this approach unviable.

### What does this look like in practice?

- We have a clear understanding of the legislative and regulatory requirements that apply to us and have effective processes in place to monitor adherence to these requirements on an ongoing basis
- If instances of non-compliance emerge, we react promptly and put in place proportionate mitigants to ensure any additional risk is controlled
- We are aware of upcoming changes to legislation and / or regulation and plan accordingly to ensure any required changes are delivered within the required timeline
- Advice and guidance is sought from relevant professional experts (internal and / or external) to support interpretation and decision making
- We do not seek to over comply, or adopt a 'worst-case' position

## Information & Data:

### Risk description:

Risks arising from a failure to source and manage robust, suitable and appropriate data & information and to exploit this to its full potential to improve outcomes and efficiency. Risks arising from a failure to prevent unauthorised and / or inappropriate access to council systems and data, this encompasses the subset of cyber security.

| Risk category      | Averse | Cautious | Balanced | Open | Eager |
|--------------------|--------|----------|----------|------|-------|
| Information & Data |        |          |          |      |       |

### Risk appetite assessment:

Our desire is to obtain information appropriately and use it effectively on a personal basis or grouped to make strategic decisions, and to store and dispose of it safely. We recognise that in the course of service delivery we will be required to share data with other public and private organisations, this must be done with the required permissions and appropriately protected. Our appetite is to be **cautious** in how we protect and share data, and be aware of the vulnerability, whilst acknowledging the benefits that effective data management gives to service prioritisation and delivery. We know that incomplete or inaccurate / corrupted data will limit our ability to utilise it effectively and could lead to incorrect decisions being made.

### What does this look like in practice?

- We utilise data derived insight at all stages of delivery from informing decision making to monitoring outcomes
- We have proportionate controls and governance in place to monitor and manage access to the data that we hold but do not restrict use unnecessarily. We maintain robust audit trails to know who, when and why data has been accessed and amended
- We evaluate which third parties we share our data with and have robust procedures and controls in place to ensure that data is consistently managed in line with our expectations.
- We effectively identify the newly emerging risks associated with this rapidly changing area (cyber security threats, changes to data storage, cloud based solutions) and put in place appropriate mitigations.
- We seek to exploit the opportunities that developments in the use of Artificial Intelligence bring in a safe and compliant way providing credible outputs with appropriate oversight

## **Safety & Security:**

### Risk description:

Risks related to health & safety, accident prevention and security across staff, contractors, residents, communities and businesses. This includes (but is not limited to) hazards / risks associated with buildings, vehicles, plant and equipment. Activities concerning public safety, business continuity and emergency response all sit with this risk type.

| <b>Risk category</b> | <b>Averse</b> | <b>Cautious</b> | <b>Balanced</b> | <b>Open</b> | <b>Eager</b> |
|----------------------|---------------|-----------------|-----------------|-------------|--------------|
| Safety & Security    |               |                 |                 |             |              |

### Risk appetite assessment:

The council has a **cautious** appetite for risk in this area and will seek to avoid unnecessary risk taking which puts its staff, residents and communities at potential harm or injury; however taking a risk averse approach to safety and security is likely to negatively impact on our ability to deliver services in line with need. Appropriate risk assessments must be completed, engaging with relevant other agencies as required, and proportionate mitigations implemented.

### What does this look like in practice?

- We value the health, wellbeing and security of our residents, communities and staff and as such we maintain our assets to a level that ensures the safety of users is not compromised
- We take a risk-based approach, undertaking risk assessments where required, and balancing the probability of adverse outcomes with the benefits that certain activities can bring
- We work collaboratively internally and with external partners to monitor, anticipate and mitigate risk to community safety. We know where the limits of our involvement are, and adhere to these, not over-stepping our remit or responsibility
- We consider risks at design stage of proposals and seek to mitigate to a proportionate and acceptable level, whilst recognising that this will often lead to increased cost
- We act on near misses to de-risk activities where possible
- We test and review business continuity plans to ensure that they remain fit for purpose

## Financial Management & Sustainability:

### Risk description:

Risks associated with poor financial control and compliance and / or poor resource allocation processes resulting in lack of financial control, overspending and poor value for money. Fraud, Bribery & Corruption risks are included here.

| Risk category | Averse | Cautious | Balanced | Open | Eager |
|---------------|--------|----------|----------|------|-------|
| Financial     |        |          |          |      |       |

### Risk appetite assessment:

The council has a **balanced** risk appetite for utilisation and management of financial resources. Robust governance, internal controls and oversight procedures must be in place to ensure the integrity and sustainability of the council's finances is not put at risk. Public money must not be utilised to fund activities that have a low likelihood of return or success. However, we recognise that as a local authority we can take a longer-term view of payback than commercial operators and that the benefits of investment in local assets and infrastructure is not limited to financial reward.

### What does this look like in practice?

- Adherence to external (public sector accountancy rules & regulations) and internal (Financial Procedures Rules) requirements, assessed independently by internal and external audit
- Successful control of revenue and capital budgets, and effective monitoring with timely intervention and correction. Budget holders demonstrate grip and control through accurate forecasting and delivery of savings initiatives
- Assessment of opportunities across a wider range of metrics than purely commercial returns. E.g. potential to act as a catalyst for regeneration, to safeguard council assets for future generations, to enhance community wellbeing
- Where services are income generating, we have a clear understanding of the basis for the fees and charges and processes in place to review on a regular basis
- Sources of possible fraud, bribery and corruption risk are understood and controls in operation to mitigate

## People & Culture:

### Risk description:

Risks arising from ineffective leadership and engagement, organisational culture, inappropriate behaviours, insufficient capacity and capability, disruptive industrial action, deteriorating wellbeing and inconsistent application of HR policies.

| Risk category    | Averse | Cautious | Balanced | Open | Eager |
|------------------|--------|----------|----------|------|-------|
| People & Culture |        |          |          |      |       |

### Risk appetite assessment:

We have a **balanced** risk appetite for activities concerning our people and organisational culture. We will value, support, develop and utilise the full potential of our workforce to make the council a stimulating and safe place to work. We place a high priority on ensuring staff members have sufficient technical competence and the necessary professional qualifications, but to deliver our objectives we also require the right values and behaviours and delivery against Our Council key principles.

### What does this look like in practice?

- We ensure our staff are trained appropriately to do their jobs, including ensuring that staff with line management responsibility are equipped and supported to effectively discharge their duties
- We do not ignore poor performance or behaviours and where terms of employment have been breached then we will act accordingly to exit employees from the organisation and inform other authorities if appropriate
- We actively manage our workforce design, undertaking service redesign activity where this is required to meet the changing needs of service users and / or the council.
- We expect employees to use their initiative in the workplace; to support customer needs; to identify and implement improvements to ways of working; and to steer their own self development
- We place a high level of importance on a culture of inclusion, we seek to develop innovative recruitment opportunities, targeting groups who may otherwise struggle with accessing mainstream employment opportunities, recognising the additional risk, and reward, that it presents.

## Operational / Service Delivery:

### Risk description:

Risks arising from inadequate, poorly designed or ineffective internal processes resulting in loss, error, poor customer service, non-compliance or poor value for money.

| Risk category                  | Averse | Cautious | Balanced | Open | Eager |
|--------------------------------|--------|----------|----------|------|-------|
| Operational & Service Delivery |        |          |          |      |       |

### Risk appetite assessment:

The council operates a broad range of services and the basis of these services ranges from legal or regulatory requirements to commercial opportunities. Our risk appetite is therefore assessed as **balanced** anticipating that some services will operate at the fringes of this assessment. Whilst ongoing delivery of many of these core services cannot be put at risk we have a risk appetite that enables and encourages the council to consider opportunities that present a 'different way of doing things'. This risk appetite involves consideration of circumstances where services may be withdrawn or reduced.

### What does this look like in practice?

- Performance monitoring is in place so we can recognise where our services are not delivering in line with requirements, and we take action to improve performance where required
- We undertake benchmarking activity, peer review and best practice guidance so we understand what good looks like and where we can tolerate under performance.
- We are forward looking, and alternative delivery approaches are considered as a matter of routine. We actively seek to maximise the benefits that technological advances bring to simplify operational processes and drive organisational efficiencies
- We work in partnership with others and recognise when other organisations are better placed to deliver than us, in these cases we maintain an outcome focus and do not seek to influence the methods of delivery or 'micro-manage'
- We may determine that in some circumstances services which are worthwhile and appreciated by those who use them can no longer be justified based on unit costs of provision, limited engagement or where demand can be met in other ways. This may result in withdrawal or reductions in provision.

## Environmental Sustainability:

### Risk description:

Risks relating to the environmental consequences of delivering core council services as well as progressing the council's priority to deliver a greener Kirklees. This may inform our views on the location and nature of development opportunities, asset management strategies and environmental health impacts. Risks associated with the strategic commitment to align to net zero and deliver against the environmental sustainability strategy are in this category.

| Risk category                | Averse | Cautious | Balanced | Open | Eager |
|------------------------------|--------|----------|----------|------|-------|
| Environmental Sustainability |        |          |          |      |       |

### Risk appetite assessment:

The council accepts the responsibility it has to ensure significant and sustainable steps are taken to maintain and improve our local environment. Through the declaration of a climate emergency in 2019 we recognise that urgent action is required to improve and protect our environment. We have an **open** appetite for risk in this category, reflecting the rapid pace of change and the constant evolution of technological enablers.

### What does this look like in practice?

- We will demonstrate that a course of action is justified with consideration of environmental impacts alongside implications for delivery of critical services, affordability and other key objectives
- We recognise that current decisions may have long lasting implications on our ability to mitigate environmental / climate related risks in the future and our decision making reflects this responsibility
- We are innovative and trial alternative approaches, accepting that resources will be utilised in the pursuit of initiatives that fail to deliver against their objectives
- We work in partnership with local communities to develop, nurture and protect areas that are valuable to them, and we empower local organisations to lead in this area
- We acknowledge that some changes may be detrimental to some members of the community and balance the overall impact to inform recommendations

## Physical Assets:

### Risk description:

Risks associated with the management and maintenance of buildings (residential, corporate and council), vehicles, plant and equipment in line with industry standards and statutory requirements. Note that risks related to building safety are captured within the Safety & Security risk.

| Risk category   | Averse | Cautious | Balanced | Open | Eager |
|-----------------|--------|----------|----------|------|-------|
| Physical Assets |        |          |          |      |       |

### Risk appetite assessment:

The council manages both its own corporate estate and a large portfolio of residential housing. The council recognises that efficient and effective utilisation of this estate is a key lever in delivering our wider ambitions and whilst there can be a greater degree of uncertainty, there can also be wide ranging benefits in seeking opportunities for improvement, commercialisation and innovation. Kirklees Council have therefore adopted an **open** risk stance, but only where the safety of residents, colleagues, customers and visitors is not impacted beyond our agreed tolerances and statutory levels.

### What does this look like in practice?

- Non-statutory maintenance and management of premises will reflect the type of utilisation and occupancy levels. We balance the longer-term benefits of undertaking preventative maintenance with the short-term cost savings associated with reliance on a more reactive approach
- We consider a variety of alternative ownership options including purchase, long term leasing and short-term hire for provision of assets. Where applicable, we explore opportunities for co-location and support opportunities for Community Asset Transfer
- We manage the disposal of assets that have been identified as surplus, conversely, we will seek to acquire assets that offer strategic or operational benefits to the Council
- We recognise the broader, non-tangible benefits of providing well maintained and well managed commercial and residential properties and the role that the council has as a regeneration lead and custodian of local heritage

### Third Party:

#### Risk description:

Risks arising from weaknesses in the management of commercial and non-commercial partnerships, resulting in poor performance, failure to meet target outcomes inefficiency, poor value for money, fraud. This may be because of lack of robust selection process, insufficient due diligence completed, target deliverables and outcomes not sufficiently clear, or poor management of the partner(s) or the partner has greater alternative obligations or priorities.

| Risk category | Averse | Cautious | Balanced | Open | Eager |
|---------------|--------|----------|----------|------|-------|
| Third Party   |        |          |          |      |       |

#### Risk appetite assessment:

Kirklees works in partnership with a large number of third parties to support and deliver services in the most effective way. We have an **open** approach to the suppliers, contractors, commissioned services, that we work with, undertaking robust due diligence and recognising our responsibilities, particularly when dealing with vulnerable clients. It is essential that we continue to work in partnership with third parties to ensure we can deliver services to our communities on an ongoing basis. Budget challenges mean that we will have to pursue alternative delivery mechanisms and this will introduce risk that must be identified and managed appropriately.

#### What does this look like in practice?

- We follow documented procurement processes (eg. CPRs) at all times
- We consider alternative delivery models and procurement approaches to drive value and / or improve attractiveness, and ensure we specify at required outcome / performance level
- We undertake appropriate due diligence of partner organisations, with consideration of the potential risk exposure that the contract brings
- We have processes in place to ensure ongoing delivery against contractual requirements is maintained and demonstrate value for money – these are proportionate to the contract size and risks
- When working with third parties we ensure that accountabilities and responsibilities are clearly documented. We are outcomes focussed, ensuring we do not manage partners excessively.
- We work collaboratively with the VCSE sector, recognising when it would be helpful for the Council to step back and working in partnership with other organisations to increase their capability and capacity for delivery

## **Reputational:**

### Risk description:

Risks arising from a failure, or perceived failure, to deliver against agreed aims and objectives. Risk can also result from adverse events, such as ethical violations, systemic or repeated failures or perceived poor customer service, leading to deterioration in trust and relationships with internal and external stakeholders

| <b>Risk category</b> | <b>Averse</b> | <b>Cautious</b> | <b>Balanced</b> | <b>Open</b> | <b>Eager</b> |
|----------------------|---------------|-----------------|-----------------|-------------|--------------|
| Reputational         |               |                 |                 |             |              |

### Risk appetite assessment:

Kirklees Council seeks to maintain and develop a reputation for efficient and effective operational delivery and transformational change, working with People, Partners and Place to achieve our shared outcomes. It is crucial that effective engagement with all stakeholder groups takes place, and that transparency of the decision-making process is maintained. However, the council acknowledges that not all decisions will be universally popular and as such will accept a level of opposition from the communities in which it operates when a change in approach will provide longer term benefits, reduced costs or wider improvements to the delivery of its services, our risk appetite is therefore assessed as **open**.

### What does this look like in practice?

- We communicate clearly and honestly and take responsibility if things go wrong
- We are proactive in managing the message
- We value, and are confident in our engagement, consultation and decision-making processes. We actively listen and respond, but this does not necessarily mean that we change the outcome
- We do not let the risk of unfavourable comment or coverage prevent us from doing the right thing
- We behave with integrity at all times

## Innovation & Change:

### Risk description:

Risks associated with the delivery of programmes and projects and the failure to successfully deliver requirements and intended achievement of agreed time / cost / quality outcomes. This risk covers internal project and projects / programmes where we are a partner.

Risks associated with our capacity to manage the pace / scale of technological change and our ability to use digital solutions to deliver improved efficiency, address changing preferences for engagement and understand the appetite of service users to shift channel / behaviour.

| Risk category       | Averse | Cautious | Balanced | Open | Eager |
|---------------------|--------|----------|----------|------|-------|
| Innovation & Change |        |          |          |      |       |

### Risk appetite assessment:

Major change activities are required on an ongoing basis to improve services offered, increase efficiency and adapt to regulatory requirements. The council expects change to be managed according to best practice in project and change management, ensuring that potential benefits and risks are understood before developments are agreed, that appropriate mitigants to manage risks are established and that effective governance and oversight is in place across the change portfolio. However, we also will seek opportunities to undertake test and learn and pilot initiatives where costs / benefits are not yet sufficiently understood. We therefore have an **open** risk appetite.

### What does this look like in practice?

- We challenge the status quo and look for different ways of doing things. Colleagues feel empowered to present options and solutions which aid the ongoing delivery of services and the achievement of our ambitions
- We actively seek opportunities to utilise digital and data led solutions to drive efficiencies across service delivery
- We acknowledge that failure will occur, we will 'fail fast', learn and move on
- Appropriate governance is in place for all change activity with clear accountability for decisions. The project management approach adopted is proportionate to the size / risk of the project underway.
- There are 'no surprises' with project delays and / or overspends with updates escalated to the right audience and in a timely manner
- Benefits realisation tracking is in place to monitor whether expected outcomes are achieved with consideration of lessons learnt to increase the chances of success for future projects

## Document governance

Document owner: **Head of Internal Audit & Risk**

Approval body: **Cabinet**

Review period: **3 yearly minimum**

Document history:

| <b>Version</b> | <b>Comments</b>   | <b>Date</b>   |
|----------------|---|---------------|
| 0.1            | First draft   | December 2023 |
| 0.2            | Head of Risk approval                                   | January 2024  |
| 0.3            | Feedback from Monitoring Officer and Strategic Director | March 2024    |
| 0.4            | Feedback from ELT                                       | November 2024 |
| 0.5            | Following consultation with Service Directors           | April 2025    |
| 0.6            | Review to ensure aligned with Key Principles            | May 2025      |