

FREE HANDBOOK

For anyone who signs off safety, security or compliance

The 9.5% Problem

How to reduce your liability with documents that stand up after an incident.

What your control achieves

95%

What it counts for after an incident

9.5%

95% effective × documents worth 10% of what they should be = 9.5% you can defend.

10 minself-test for any
procedure**Free**templates and
checklists**6**jurisdictions, from the
US to New Zealand**30 days**

plan to close your gaps

Start here: score your first procedure on page 9 →**Richard G. Prouse**

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SSRN working paper, 2026

READ THIS FIRST

After an incident, nobody asks whether you had a procedure. They ask you to prove it.

Investigators, insurers, regulators and courts all work from the same thing: the record. This handbook shows you how to make yours stand up, in plain language, whatever the size of your organisation and wherever you operate.

10 MINUTES**Score one procedure**

Ten yes-or-no questions give you a score out of 100 (page 9).

1 HOUR**Learn the method**

Five verbs that work under any law or standard, and the templates that apply them (pages 11 to 15).

30 DAYS**Close your gaps**

A week-by-week plan to fix your weakest documents and prove it (page 19).

Who it is for

- Sole traders and small-business owners who sign off their own safety, security and compliance
- Managers who write or own procedures
- Directors and officers with personal due-diligence duties
- Compliance, privacy, quality, safety and security professionals
- Investors checking whether a business can prove what it claims

What this is not

- It is not legal advice, and it does not guarantee compliance with any law.
- The country examples are brief illustrations, correct as at October 2026. Laws change: check the current law that applies to you, and take advice for your situation.
- The model it uses is from a working paper that has not yet been peer reviewed. Treat it as a practical framework, not a legal test.

Why I wrote it

After an incident, the same pattern appears again and again: **the control worked, but nobody could prove it**. This handbook is the method I developed to measure that gap and close it. It is free to read, use and share. — Richard G. Prouse

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One-page summary

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01 — NO RECORDS EXIST

The work was done. Nobody wrote it down.

On 5 January 2024 a door plug blew out of Alaska Airlines Flight 1282, a Boeing 737 MAX 9, as it climbed through 14,830 feet. The bolts that should have held it in place were missing.^[1]

The plug had been opened months earlier, on 18 September 2023, during work at Boeing's factory in Renton, Washington. US investigators found it was opened "**without the required documentation**".^[2] In March 2024 Boeing told a US senator its working hypothesis was that "**the documents required by our processes were not created when the door plug was opened.**"^[3]

The missing record did not just fail to prove the control. It switched the control off.

The US National Transportation Safety Board found: "**The absence of proper documentation of the door plug work meant no quality assurance inspection of the plug closure occurred.**"^[2] The inspection that should have caught the missing bolts was never triggered, because on paper the work had never happened.

The Board's finding on probable cause was Boeing's failure to "**provide adequate training, guidance and oversight**" to its factory workers.^[2] It issued 11 safety recommendations to the regulator and seven to Boeing.^[1]

1

piece of work with no record

0

quality inspections of the closure

14,830 ft

where the gap became visible

If it can happen at one of the most regulated manufacturers in the world, it can happen in any organisation, including yours.

Most documentation voids never make the news. They sit quietly in ordinary businesses until an incident, a claim or an audit asks the same question investigators asked here: *show us the record*. The rest of this handbook is about making sure you can. **Over the page: how to put a number on that gap.**

02 — THE 9.5% PROBLEM

The system worked. The defence did not.

A high-security site installs a biometric entry system. In operation it stops unauthorised access 95% of the time. By any engineering measure, it is a good control.

Then there is a breach, and an investigation. The investigator asks two questions. **How were people enrolled in the system? Who reviewed the access logs, and when?** The honest answer to both is that someone did it, sensibly, most of the time. But neither the enrolment criteria nor the log reviews were ever written into an approved procedure, and no record of the reviews exists.

So the site cannot show that the control was designed for the threat, that it was run as designed, or that anyone checked. In the language of this handbook, its documentation is worth about a tenth of what it should be.

HOW WELL IT WORKS

0.95

HOW WELL IT IS
DOCUMENTED

× 0.10

WHAT IT IS WORTH IN
YOUR DEFENCE

= 9.5%

The money went on the equipment. The exposure was in the paperwork.

This is the 9.5% problem. It is not about bad security or careless people. It is about the gap between **what you do** and **what you can prove you did**. That gap has a name, the **documentation void**, and it can be measured, which means it can be closed.

Most organisations never measure it, because it only becomes visible after something has gone wrong. By then the record is fixed: you cannot go back and write the review you did not record.

The documentation void

The gap between a control that exists in practice and a control that exists on paper. It is invisible from the inside, which is why investigators usually find it before you do.

This example is an illustration from the working paper behind this handbook, not a real client or incident.^[4] **Page 9 shows you how to find your own number.**

03

WHY PAPERWORK DECIDES LIABILITY

Two courts, one lesson

Courts rarely ask whether you had good intentions. They ask what a reasonable organisation would have done, and what you can show you actually did.

NEW ZEALAND · 2020 TO 2026

Officer convicted personally

A chief executive, a crane and an exclusion zone

In August 2020 a stevedore was killed at the Ports of Auckland when a container fell during a crane lift. The port's former chief executive was prosecuted personally, as an officer, for failing to exercise due diligence. He was convicted in 2024 and fined NZ\$130,000 with NZ\$60,000 costs; the High Court dismissed his appeal on 31 March 2026.^[5]

The court found he had failed to take reasonable steps to ensure **a clearly documented, effectively implemented and appropriate exclusion zone** around operating cranes, and to **verify** the resources and processes behind it. It also said a safe system needs a way of monitoring and measuring performance.^[5]

AUSTRALIA · 2016 TO 2020

Record fine at the time

A theme park ride and a reliance on procedures

Four people died on the Thunder River Rapids Ride at Dreamworld in October 2016. The operator, Ardent Leisure, pleaded guilty to three offences under the Work Health and Safety Act and was fined A\$3.6 million. The magistrate found it **"was aware of the risk of failure of the administrative controls, but continued to rely too heavily upon them"**, and that its failures "were not momentary".^[6]

The lesson for everyone else

Neither case turned on a missing piece of paper alone. One turned on whether a rule was **clearly documented, implemented and checked**; the other on relying on procedures that were known to fail. Documents do not replace doing the right thing. They are how you prove you did it, and how you find out early when something is slipping.

Every record you keep should be able to show three things: **the control was right for the risk, it was actually carried out, and someone checked.**

04 — THE LR MODEL IN PLAIN WORDS

Five numbers that measure your exposure

The Prouse Residual Liability Model treats documentation as a multiplier. A control is only worth, in your defence, what you can prove about it.

$$L_r = T \times V \times I \times (1 - C_e \times C_d)$$

Residual liability = the part of your exposure you cannot show your control covers. Version 2.1 of the model.

T · Threat

How likely is the event?
A credible, named threat or hazard.

V · Vulnerability

If it happens, how likely is harm without the control?

I · Impact

How bad is the harm: injury, loss, penalties, costs?

C_e · Control effectiveness

How well does your control work in practice, on a good day and a bad one?

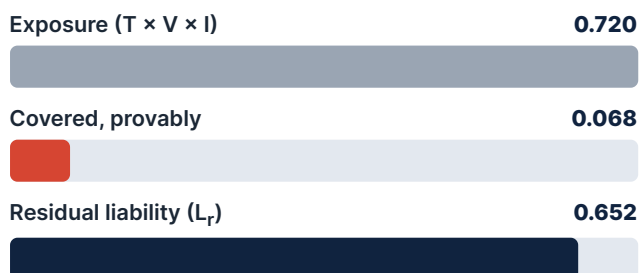
C_d · Documentation Coefficient

How well can you prove the control was designed, run and checked? From 0 (nothing) to 1 (complete). **Page 9 shows you how to score it.**

Same control. Same cost. Different paperwork.

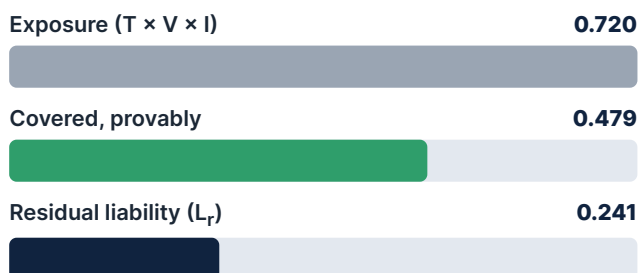
Threat 0.9 × vulnerability 0.8 × impact 1 gives an exposure of 0.72. The control works 95% of the time (C_e 0.95).

Weak documentation (C_d 0.10)



90% of the exposure remains

Good documentation (C_d 0.70)



34% of the exposure remains

Simplified for this handbook: values on a scale of 0 to 1, with impact set to 1. Sources: Prouse (2026)^[4] and the Version 2.1 specification, which adds a term for record-keeping offences, reports a simulation study in which the model chose fixes better than risk matrices, and sets out how it will be tested.^[7] A practical framework, not a legal test.

05 — WORKED EXAMPLE

Three documents that change the answer

Go back to the biometric entry system. What would have turned a 9.5% defence into a strong one? Not new hardware. Three documents.

THE DOCUMENT		ANSWERS QUESTIONS
1	Enrolment criteria tied to named threats Who may be enrolled, on whose approval, and which threats the system is there to stop	1, 3, 4
2	A log-review schedule with a named role Which role reviews the access logs, how often, and what they look for	4, 7, 8
3	A record of each review Date, reviewer, what was found and what was done, kept with the procedure	7, 8, 10

Question numbers refer to the ten-question test on page 9.

Before

The system works. Nobody can show how people were enrolled or that anyone looked at the logs.

9.5%

of the control's value is defensible

After

Same system. Enrolment, review and evidence are written, owned and recorded.

Most of it

can be shown, because the record now exists

The cheapest risk reduction most organisations will ever buy is a well-kept record of what they already do.

Why this works under almost any law

Safety and security laws differ, but they tend to ask the same three things after an incident: was the risk identified, was a reasonable control in place, and was it checked? A written procedure answers the first two. A record of it being run and reviewed answers the third. Without them, you are asking the investigator to take your word for it.



SCORE YOURSELF

The ten-question test

Pick **one** procedure you are responsible for, ideally the one you would least like to defend after an incident. Answer honestly: if you are not sure, the answer is no.

The procedure I am scoring: _____

	QUESTION	YES	NO
1	Is it written down and approved? A current document, signed off by a named person.	☐	☐
2	Has it been reviewed in the last 12 months? With the review date recorded on the document.	☐	☐
3	Does it name the threats it is meant to address? Specific threats, not a general statement of purpose.	☐	☐
4	Does it say who is responsible for each step? By role, so it still works when people change.	☐	☐
5	Can the people who need it find it within two minutes? Including out of hours and from where they work.	☐	☐
6	Is there a record that those people were trained on it? Names, dates and the version they were trained on.	☐	☐
7	Is a record made each time the control is carried out? A log, checklist or system entry.	☐	☐
8	Does someone review those records, and is the review itself recorded? A second person, on a set schedule.	☐	☐
9	Has it been tested or exercised in the last 12 months? With the result written down.	☐	☐
10	Is it updated after incidents or changes, with a version history? So you can show what the procedure said on any given date.	☐	☐

Your score

10 points for every yes

____ / 100

Your screening C_d

Score divided by 100

0. ____

Prefer to do it on screen? The same test runs free at confidentialriskconsulting.com/audit-tools/. Your answers stay in your browser.

WHAT YOUR SCORE MEANS

Fragile, marginal or robust

The Prouse Forensic Index turns your score into a band that a board, an insurer or a client can understand at a glance.

PROUSE FORENSIC INDEX

**0 to 39 · Fragile** C_d below 0.40

On these answers, the control would be hard to evidence after an incident. **Start with questions 1, 4 and 7:** write it down and get it approved, name who does each step, and start keeping a record every time it is carried out. These three alone lift you 30 points.

40 to 75 · Marginal C_d 0.40 to 0.75

Parts of the control are documented, but there are gaps an investigator would find. **Look at questions 6, 8 and 9:** training records, an independent check of the records, and a test in the last year are what separate "we have a procedure" from "we can prove it works".

76 to 100 · Robust C_d 0.76 and above

The control is well supported on paper. **Keep it there:** put the review date in your calendar, keep the version history, and score your next most important procedure. A robust file decays quickly if nobody owns it.

Put it into the model. Multiply your C_d by how well the control works in practice (C_e). A control that works 90% of the time with a score of 50 gives $0.90 \times 0.50 = 0.45$: in your defence, the control is worth only half of what it does in practice.

0.45

The index and bands come from the working paper.^[4] Score bands are a guide to priorities, not a legal opinion on any control.

07 — THE UNIVERSAL METHOD

Five verbs that work under any standard



Laws differ from country to country. The way good documents are managed does not.

Every ISO management system standard published since 2012, including quality (ISO 9001), environment (ISO 14001), occupational health and safety (ISO 45001) and information security (ISO/IEC 27001), shares the same clause on **documented information: clause 7.5.**^[8] Reduced to plain words, it asks you to do five things.

VERB	WHAT IT MEANS IN PRACTICE	WHERE IT COMES FROM IN CLAUSE 7.5
1. Create	Give it an identity: title, number, owner, date. Write for the person doing the work.	7.5.2: identification and description; format
2. Approve	A named person with authority signs it off as suitable and adequate, and dates it.	7.5.2: review and approval for suitability and adequacy
3. Control	The right people can find the current version fast; old versions are withdrawn but kept.	7.5.3: availability, distribution, access, storage, control of changes
4. Review	On a set date, and after every incident or change. Record that the review happened.	7.5.2 and 7.5.3: updating and change control
5. Prove	Each time the control runs, it leaves a record. Records are kept, protected and checked.	7.5.3: protection, retention and preservation of records

Why this matters to you, even if you will never seek ISO certification: it is the closest thing the world has to a shared standard for what a well-kept document looks like. If your documents pass these five verbs, an auditor, insurer or investigator from almost anywhere will recognise them as properly managed.

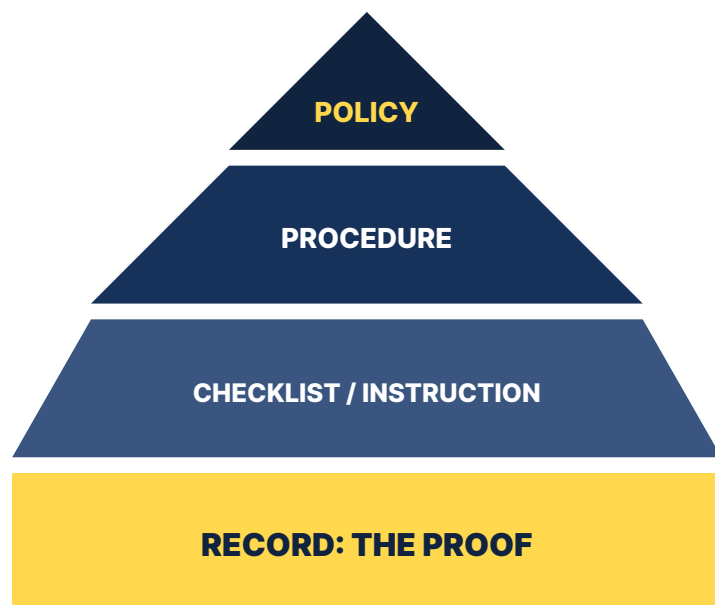
Clause 7.5 sets how documents are managed, not how many you need. That depends on your size, risks and the law that applies to you (page 18).



POLICY, PROCEDURE, RECORD

Which document does which job

Most documentation voids come from one confusion: treating a policy as if it were a procedure, or a procedure as if it were proof.

**What and why**

Set by leadership.

"We control access to restricted areas."

Who, what, when and how

Owned by a role.

"Security enrols staff on approved request."

The steps at the point of work

Short enough to follow under pressure.

"Check ID, check approval, enrol."

Proof it happened

Dated, attributable, kept.

"Enrolled J. Smith, 4 May, approval #212."

Rule 1

Every policy points to at least one procedure. A policy with no procedure is a promise nobody is responsible for keeping.

Rule 2

Every procedure produces a record. If carrying it out leaves no trace, you cannot prove it happened.

Rule 3

Every record is looked at by someone. Records nobody reviews cannot show you are checking, which is what due diligence requires.

The most common mistake

A thick policy manual with no procedures underneath and no records at the bottom. It looks impressive on a shelf, and it fails at the first question an investigator asks: *show me the last three times this was done.*



A PROCEDURE THAT HOLDS UP

The one-page procedure template

Fourteen fields. Fill them all and the procedure answers every question in the ten-question test. The yellow numbers show which question each field answers.

FIELD	WHAT GOES IN IT	TEST	YOUR ENTRY
Title and ID	Plain name of the task, a unique number and version	1	-----
Owner	The role responsible for keeping it current, not a person's name	4	-----
Approved by and date	Name, role and date of sign-off	1	-----
Next review date	Within 12 months, and after any incident or change	2 10	-----
Purpose: the risks it controls	Name the specific threats or hazards	3	-----
Scope	Where, when and to whom it applies	3	-----
Responsibilities	Each step's owner, by role	4	-----
Steps	Numbered, one action each. Mark the steps that create a record	7	-----
Records produced	What is recorded, by whom, and where it is kept	7 8	-----
Checks	Who reviews the records, how often, and where that review is logged	8	-----
Training	Who must be trained, and where the training record is kept	6	-----
Testing	How and how often it is exercised; where results are recorded	9	-----
Where to find it	Location people can reach in two minutes, including out of hours	5	-----
Change history	Version, date, what changed and why	10	-----

Write it for the person doing the work

Short sentences, one action per step, the words they actually use. If it cannot be followed at 3 a.m. by someone new, rewrite it.

One page is the target, not the limit

Long procedures go unread. Put detail in a linked checklist and keep the procedure to what must happen and what must be recorded.

10 — THE DOCUMENT REGISTER

The single list that runs everything

One list of every controlled document and record type: what it is, who owns it, which version is current, and when it is next reviewed. It is the first thing an auditor asks for, and the fastest way to see your own gaps.

[illegible]

Example rows are illustrations. A spreadsheet is enough for most organisations.

Start with risk, not paper

List your ten highest risks first, then the documents that control each. Do not try to register everything on day one.

Every row has an owner

A role, not a name, so
the register survives
people leaving.

Overdue reviews in red

Sort by next review date once a month. Anything past due is a void in waiting.

11

THE SEVEN VOIDS

The gaps that sink most files

Learn to recognise these seven and you will find most documentation voids in minutes. Each one maps to a question in the test on page 9.

1

The orphan

Nobody owns it, so nobody updates it. **Fix:** Name an owner by role (Q4).

2

The fossil

Last reviewed years ago, or never. **Fix:** Set a review date and diarise it (Q2, Q10).

3

The generic

Could belong to any organisation; names no real threat. **Fix:** Name the specific threats it controls (Q3).

4

The hidden

Exists, but nobody can find it when it matters. **Fix:** Put it where users can reach it in two minutes (Q5).

5

The untaught

People were never trained on it, or there is no record they were. **Fix:** Train, and record names, dates and version (Q6).

6

The invisible

The control runs, but leaves no trace. **Fix:** Make every run produce a record (Q7).

7

The unchecked

Records pile up and nobody looks at them. **Fix:** Schedule a second person to review, and log the review (Q8).

The quickest audit you will ever do: pick your most important procedure and ask its owner to show you the last three records of it being carried out, and who checked them. If they cannot, you have found a void.

The seven categories are the author's framework, drawn from the ten-question test.

12 — AROUND THE WORLD

Six jurisdictions, one question: can you prove it?

Laws differ, but every regime below expects you to identify the risk, put reasonable controls in place and be able to show it. Ordered by where most readers work.

United States

Occupational Safety and Health Act 1970

The duty: The General Duty Clause (s 5(a)(1)) requires every employer to provide a workplace "free from recognized hazards" that are causing or likely to cause death or serious physical harm.^[9]

The stakes: Up to US\$16,550 per serious violation and US\$165,514 per wilful or repeated violation, for penalties assessed after 15 January 2026.^[10]

United Kingdom

MHSW Regulations 1999; Martyn's Law

The duty: Employers with five or more employees must record the significant findings of their risk assessment (reg 3(6)).^[11] From about spring 2027, enhanced-tier premises and events (800 or more people) must document their security procedures and measures.^[12]

The stakes: For a large organisation with very high culpability and the highest harm, the fine range is £2.6 million to £10 million.^[13] Under Martyn's Law, up to £18 million or 5% of global turnover.^[14]

European Union

Framework Directive 89/391/EEC

The duty: Every employer must "be in possession of an assessment of the risks to safety and health at work" (Art 9(1)(a)).^[15]

The stakes: Penalties are set by each member state under its own law.

Continued over the page: Canada, Australia and New Zealand, and the same rule beyond safety.

AROUND THE WORLD, CONTINUED

Canada

Criminal Code, s 217.1 (the Westray law)

The duty: Anyone who directs how another person works "is under a legal duty to take reasonable steps to prevent bodily harm" to that person or anyone else. In force since 31 March 2004.^[16]

The stakes: Breaching the duty can ground criminal negligence charges. An organisation convicted on indictment faces a fine with no maximum.^[16] Provincial health and safety laws apply as well.

Australia

Model Work Health and Safety Act 2011

The duty: Officers must exercise due diligence, including taking reasonable steps to verify that resources and processes for managing risk are provided and used (s 27).^[17]

The stakes: Category 1 offence: up to A\$17,034,000 for a body corporate (Commonwealth, indexed for 2026–27).^[18]

New Zealand

Health and Safety at Work Act 2015

The duty: Officers must exercise due diligence, including reasonable steps "to verify the provision and use of the resources and processes" for managing risk (s 44(4)(f)).^[19]

The stakes: Reckless conduct (s 47): up to NZ\$3 million for a company; up to NZ\$600,000 and five years' imprisonment for an officer.^[20]

Beyond safety: the same rule, in so many words

Any organisation handling personal data of people in the European Union must **"be able to demonstrate compliance"** with the data protection principles: the law calls it accountability (GDPR, Art 5(2)). The highest tier of fines reaches €20 million or 4% of worldwide annual turnover, whichever is higher (Art 83(5)).^[21]

The pattern

Whether the subject is a crane, a theme park ride or a customer database, the duty ends in the same place: show the record. Directors and officers increasingly carry it personally. The five verbs on page 11 meet that expectation wherever you operate.

Brief illustrations as at October 2026, not a complete statement of any law and not legal advice. Maximum penalties apply to the most serious offences; most cases are far below them. Check the current law that applies to you.

13 — SIZE IT RIGHT

What is enough for you

More paper is not more protection. The aim is the smallest set of documents that proves your most important controls work. Here is a starting point by size.

	SOLE TRADER	SMALL BUSINESS	MID-SIZED	LARGE OR LISTED
Start with	Your three riskiest tasks	Your ten highest risks	A register for each site or function	An integrated system across the group
Must-have documents	A one-page register; a procedure for each of the three	Procedures for each top risk; emergency plan	Document control system; internal audit plan	Clause 7.5-aligned system; independent assurance
Records	A simple dated log	Logs plus training sign-off sheets	Logs, training, review and test records	All of these, sampled by internal audit
Review	Yearly, and after any incident	Yearly, and after incidents or changes	Set cycles by risk level	Set cycles plus board-level reporting
Who signs off	You, with the date	The owner or manager	Named role owners and an executive	Executives, with board oversight

Proportionate, not minimal

Most safety laws expect what is reasonable for your size and risks. A sole trader with a dangerous task can need more than an office of fifty. Let risk, not headcount, decide.

Thresholds are set by law

Some duties start at a size threshold: in the UK, for example, recording risk assessment findings is required from five employees (page 16). Check yours.

Ten good documents that are used and checked beat a hundred that sit on a shelf.

This table is the author's practical guidance, not a legal requirement.

14

THE 30-DAY PLAN

From score to proof in four weeks

About two hours a week. Tick each box as you go: a finished checklist is itself a record that you exercised due diligence.

WEEK 1

Find

- ☐ List your ten highest risks
- ☐ Start the document register (page 14)
- ☐ Score the procedure behind each top risk (page 9)
- ☐ Circle the three lowest scores

WEEK 2

Fix the worst

- ☐ Give each of the three an owner, by role
- ☐ Rewrite them on the one-page template (page 13)
- ☐ Name the threats each one controls
- ☐ Get each approved, signed and dated

WEEK 3

Make it provable

- ☐ Train the people who use them; record names, dates and version
- ☐ Make every run of the control leave a record
- ☐ Schedule a second person to review the records

WEEK 4

Prove it

- ☐ Test or exercise one procedure; write down the result
- ☐ Re-score all three
- ☐ Show your leadership or board the before-and-after scores
- ☐ Set the next review dates

Day 30: what you will have

A register of your top risks, three procedures that pass the ten-question test, the records to prove they run, and a before-and-after score you can show a board, an insurer or a client.

MY SCORES



The 9.5% Problem

A control that works 95% of the time, backed by documents worth 10% of what they should be, counts for **9.5%** in your defence.

The model

$$L_r = T \times V \times I \times (1 - C_e \times C_d)$$

Residual liability = exposure minus what your control can be **shown** to cover. Documentation (C_d) multiplies everything.

The five verbs

Create → Approve → Control → Review → Prove

From ISO clause 7.5, shared by every ISO management system standard.

The three rules

Every policy points to a procedure. Every procedure produces a record. Every record is reviewed by someone.

Your band

0-39 FRAGILE

40-75 MARGINAL

76+ ROBUST

The ten-question test

10 points for each yes. Your score ÷ 100 = your C_d .

- 1 Is it written down and approved?
- 2 Has it been reviewed in the last 12 months?
- 3 Does it name the threats it is meant to address?
- 4 Does it say who is responsible for each step?
- 5 Can the people who need it find it within two minutes?
- 6 Is there a record that those people were trained on it?
- 7 Is a record made each time the control is carried out?
- 8 Does someone review those records, and is the review itself recorded?
- 9 Has it been tested or exercised in the last 12 months?
- 10 Is it updated after incidents or changes, with a version history?

The quickest audit you will ever do

Ask for the last three records of your most important control being carried out, and who checked them. If nobody can show you, you have found a void.

Free self-test
confidentialriskconsulting.com



NEXT STEPS

Want a second pair of eyes?

You can do everything in this handbook yourself. If you would rather have an independent score, or need to show one to a board, insurer or client, here is how I can help.

FREE

Online self-assessment

The ten-question test on screen, with your gaps listed. confidentialriskconsulting.com/audit-tools/

FREE

20-minute call

Tell me what you are responsible for; I will tell you honestly whether an audit would help. confidentialriskconsulting.com/contact/

US\$875

Single-procedure benchmark

I test one procedure against the model and send a scored report with prioritised fixes within 5 working days.

US\$3,500

Team workshop

A team licence for this handbook, two live 90-minute online sessions, and one of your procedures scored with you.

Larger organisations: an organisation-wide gap analysis is US\$6,450, delivered in 15 working days. All work is fixed-fee, confidential and delivered remotely, worldwide.

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Author of the Prouse Residual Liability (L_r) Model, SSRN working paper, 2026.

- Version 2.1 specification, calculator and simulation code free under CC BY 4.0
- Chosen over 13 alternatives in a pre-specified simulation study
- Validation against real court outcomes planned and pre-specified

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SOURCES AND NOTES

Every fact, linked

Facts and figures were checked against these sources in October 2026. Laws and penalty amounts change; check the current position before relying on any of them.

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