

# Corporate Risk Register - Strategic Risks

## Quarterly Update

Report Author: Helen Belenger  
Generated on: 13 March 2018



Risk Status	
	Alert
	High Risk
	Warning
	OK
	Unknown


### Controlled

Status	Risk No.	Risk Area	SLT Lead	Original Score	Previous 1/4ly Review Score	Current Score	Target Score	Target Date	Internal Controls
	CRR 01	Financial Resilience	John Ward	9	4	4	3	31-Mar-2019	Good
	CRR 08	Skills / Capability / Capacity	John Ward	3	3	3	2	31-Mar-2019	Good
	CRR 09	Business Continuity	John Ward	9	6	6	3	31-Mar-2019	Good
	CRR 68	Health and Safety	John Ward	9	4	4	4	31-Mar-2019	Good
	CRR 97	Cyber Risk Attack Across ICT Estate	John Ward	6	6	6	6	31-Mar-2019	Good
	CRR 145	Data Protection Act Breach - Loss of Data	John Ward	4	4	4	4	31-Mar-2019	Good



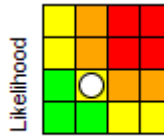
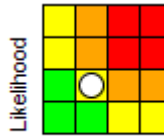
### Control Pending

Status	Risk No.	Risk Area	SLT Lead	Original Score	Previous 1/4ly Review Score	Current Score	Target Score	Target Date	Internal Controls
	CRR 88	Non Achievement of Recycling Target of 50% by 2020	Jane Dodsworth	6	3	3	3	01-Jan-2020	Improving
	CRR 147	Southern Gateway Regeneration	Paul Over	9	-	9	3	28-Sep-2018	Improving
	CRR 148	Local Plan	Andrew Frost	9	-	9	3	31-Jul-2020	Improving

## Appendix 2 (a)

Status	Risk No.	Risk Area	SLT Lead	Original Score	Previous 1/4ly Review Score	Current Score	Target Score	Target Date	Internal Controls
	CRR 149	Impact of Universal Credit (UC) on working claimants across the district	Louise Rudziak/ Jane Dodsworth	9	-	<b>6</b>	3	31-Mar-2019	Improving

**Management** Controlled

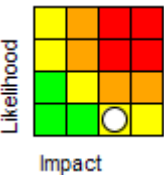
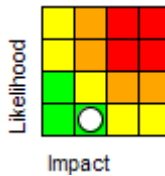
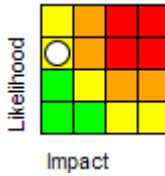
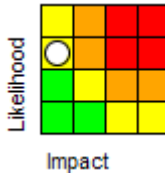
<b>CRR 01</b>	<b>Financial Resilience</b>	<b>Management</b>	Controlled		
		<b>Corporate Links</b>	Corporate Plan Priority - Use Resources Effectively and Efficiently.		
<p><b>Risk Description:</b></p> <ul style="list-style-type: none"> <li>- Failure to maintain a robust and deliverable budget will lead to a lack of resources to fund services and council priorities, leading to reactionary decision making, and reputational consequences.</li> <li>- Failure to maximise efficient use of resources and so unsuccessful redirection of resources and not achieving objectives and outcomes of the council including deficit reduction plans.</li> <li>- Failure to maximise income streams.</li> <li>- Unpredictable Government policy (e.g. Brexit and localisation of business rates.)</li> </ul> <p><b>SLT Risk Owner:</b> John Ward  <b>Responsible Officer:</b> Helen Belenger</p>					
<b>Original and Target Risk Assessment</b>					
<b>Original Risk Date</b>	31-Jul-2012		<b>Target Risk Date</b>	31-Mar-2019	
<b>Original Risk Score</b>	9		<b>Target Risk Score</b>	3	
<b>Current and Previous Quarter Risk Assessment</b>					
<b>Current Assessment Previous Quarter Assessment</b>	08-Mar-2018				4
	21-Dec-2017				4

## Appendix 2 (a)

Internal Controls	Current Status	
Five Year Financial Model and Deficit Reduction Plan	<ol style="list-style-type: none"> <li>1. Monitor and update the 5 year financial model as required and review with CMT.</li> <li>2. Assess against progress on Deficit Reduction Plan and savings targets.</li> <li>3. Monitor income volatility in relation to use of New Homes Bonus (NHB) (Policy approved) and localisation of both Council Tax Reduction scheme (CTR) &amp; business rates.</li> </ol>	Good
Income Streams	<ol style="list-style-type: none"> <li>1. Monitor income performance and review with SLT so remedial action can be taken.</li> <li>2. Heads of Services and budget managers monitor income monthly from budget monitoring reports.</li> <li>3. Service managers to assess fee setting for services in accordance with Fees &amp; Charging Policy, and react when if income reductions occur.</li> <li>4. Putting money in place to achieve better returns.</li> </ol>	Good
Reconciliation of Income	<ol style="list-style-type: none"> <li>1. Monthly reconciliations by services.</li> <li>2. Non compliant services are identified by Internal Audit when service is reviewed as part of the Audit Plan.</li> <li>3. Support given by Financial Services when setting up new income streams and reconciliation processes.</li> </ol>	Improving
Control of Expenditure	<ol style="list-style-type: none"> <li>1. Approval limits and routes for additional funding are detailed in the Council's Constitution and Financial Regulations.</li> <li>2. Quarterly monitoring of major variances by SLT.</li> </ol>	Good
Financial Strategy Principles	<ol style="list-style-type: none"> <li>1. All key decisions of the Council should relate back to the Corporate Plan.</li> <li>2. Ensure the revenue and capital programme remain balanced and sustainable over a rolling 5 year period.</li> <li>3. Over the next 5 years maintain a position of non-dependency on reserves.</li> <li>4. In order to maintain a balanced budget in a climate of no growth, savings in the revenue budget or external funding will need to be identified before any new revenue expenditure, including capital expenditure that has revenue consequences, is approved.</li> <li>5. Review costs in response to changes in service demand.</li> <li>6. Where the Council has discretion over charging for services, consideration needs to be given as to the extent to which service users should bear the costs, and the proportion met by Council Tax.</li> <li>7. Continue to review the Council's costs in order to find further savings.</li> <li>8. Match Council Tax increases to a realistic and affordable base budget.</li> <li>9. Budgets should be pooled with other service providers to achieve more effective and cost efficient outcomes for the community.</li> <li>10. New Homes Bonus (NHB) should be reserved to reward communities that have accepted growth, whilst also considering the fact that this is not new funding, and to some extent may have to be used to protect services. This should be allocated annually, and only committed once received.</li> <li>11. Localisation of Business Rates. The decision to pool our business rates should be reviewed annually after receipt of government draft settlement to that the Council is in the best financial position. The Section 151 Officer continues to review the risks and opportunities that will emanate from the 100% localisation of business rates.</li> </ol>	Good
Revenue and Capital	<ol style="list-style-type: none"> <li>1. Capital receipts, reserves and interest on investment will primarily be available for new investment of a non-</li> </ol>	Good





## Appendix 2 (a)

Programme Principle	<p>recurring nature, thereby minimising the overall financial risk.</p> <p>2. Ensure that a sufficient level of reserves are maintained, as informed by the Financial Strategy, so that the Council can remain flexible and is able to respond to a changing local government environment.</p> <p>3. Borrowing could be used for capital schemes or "invest to save" projects providing the cost of servicing the debt is contained within the revenue savings/income the project generates. The payback period for invest to save projects should be shorter than the life of the asset.</p>	
Treasury Management	1. Generate better returns with the Treasury Management Strategy and the Investment Protocol and the Council's view of risk and increased diversity.	Good
<b>Latest Position Statement</b>		
08 Mar 2018	<p>Deficit reduction plan was approved, and accepted by the former DCLG (now MHCLG) as evidence to secure a 4 year funding agreement up to 2019-20. Financial targets to be monitored through the programme boards, as the council continues to set balanced budgets, and non-reliance on NHB and other temporary funding, and has a forward funded 25 year asset replacement fund.</p> <p>The audited 2016-17 outturn showed an underspend of £295k, and the current year 2017-18 is forecast to have an underspend of £0.37m.</p> <p>The Council's 5 year Financial Model was updated following the joint Cabinet &amp; CMT strategy day in October 2017 ahead of preparation for the 2018-19 budget cycle. The updated model was reported to Cabinet in December 2017 and approved by Council on 23 January 2018. At that time the 5 year model was showing a surplus of approximately £1.6m for 2018-19. The Council set its budget for 2018-19 on 6 March 2018 with a £5 council tax rise for Council Tax Band D. Its spending plans included growth items amounting to £523,000 and enabled a transfer to the investment opportunities reserve of £861,300 in line with the financial principles that underpin the financial strategy. Provision was also made for the council investments affected by IFRS 9. The MHCLG are to undertake a consultation on the statutory override issue that was raised during the budget process.</p> <p>The Council remains part of the Coastal West Sussex business rates pool in 2018-19, as the West Sussex 100% pilot bid was not selected by MHCLG.</p> <p>On-going monitoring of volatile income streams such as the car parking service which can be affected by the weather and economy, so it is important to ensure that the use of the car parks are marketed effectively and assessing the Council's pricing policy.</p>	

<b>CRR 08</b>	<b>Skills / Capability / Capacity</b>	<b>Management</b>	Controlled
		<b>Corporate Links</b>	Corporate Plan Priority - Use Resources Effectively and Efficiently.
<b>Risk Description:</b> Failure to have resilience in the staff structure, and so lack the right number of staff with the right skills to deliver services, along with unrealistic expectations of services, which could lead to service failure, reputational damage and potential litigation.			
<b>SLT Risk Owner:</b> John Ward. <b>Responsible Officer:</b> Joe Mildred / Tim Radcliffe.			
<b>Original and Target Risk Assessment</b>			
<b>Original Risk Date</b>	31-Jul-2012		<b>Target Risk Date</b>
<b>Original Risk Score</b>	3		31-Mar-2019
			<b>Target Risk Score</b>
			2
			
<b>Current and Previous Quarter Risk Assessment</b>			
<b>Current Assessment</b>	08-Mar-2018		3
	05-Jan-2018		3
<b>Internal Controls</b>			<b>Current Status</b>
Workforce Development Plan	1. Ensure commissioning and objectives remain relevant and up to date. 2. Review personnel literature, marketing CDC as an employer at recruitment fairs. 3. CDC salaries - benchmarking exercise to be undertaken and monitored. 4. New apprenticeship Levy.		Good
Appraisal Process	1. Succession planning considered during appraisal process.		Good

## Appendix 2 (a)





	<ul style="list-style-type: none"> <li>2. Completion of appraisals on time.</li> <li>3. Strategic training needs identified using Belbin or equivalent.</li> <li>4. Possible use of 360 degree appraisals.</li> </ul>	
Training Plan and Budget	<ul style="list-style-type: none"> <li>1. Use First Line Managers course to develop new managers.</li> <li>2. Use diploma management studies for senior managers.</li> <li>3. Specific training programme for new Directors and Heads of Service.</li> </ul>	Good
Recruitment Benefits	<ul style="list-style-type: none"> <li>1. Use of benefits packages for relocation, assisted house purchase scheme to aid recruitment.</li> <li>2. Guidance to be issued for how to use recruitment benefits.</li> </ul>	Good
Staff Satisfaction Survey	<ul style="list-style-type: none"> <li>1. Staff survey to be undertaken every two years.</li> </ul>	Improving
Strategic Leadership Team & Divisional Managers	<ul style="list-style-type: none"> <li>1. Specific training programme to newly appointed Divisional Managers to address core competencies, hosted by Portsmouth University.</li> <li>2. Succession plan currently being put into place.</li> </ul>	Good
Measuring Staff Turnover by Significant Groups	<ul style="list-style-type: none"> <li>1. SLT to review turnover statistics and the reasons.</li> </ul>	Good
<b>Latest Position Statement</b>		
08 Mar 2018	<p>Apprenticeship Levy came into effect 1.4.17. Workforce development initiatives now live. Pay Policy project on track.</p> <p>Access to courses on Levy of some concern although number of courses increasing and being publicised to managers, requirement to release staff for 20% of time to study and pre-course requirements. HR monitoring take-up of courses and spend of Levy. Strong links developed with both Chichester College and University.</p> <p>A specific skills training programme for the new divisional managers has been arranged.</p> <p>Recruitment issues for specific service areas are being kept under review by SLT.</p>	

<b>CRR 09</b>	<b>Business Continuity</b>	<b>Management</b>	Controlled		
		<b>Corporate Links</b>	Corporate Plan Priority - Use Resources Effectively and Efficiently.		
<p><b>Risk Description:</b> Failure to react to an incident that would adversely affect the delivery of services, including leading to a breach of the council's statutory duties under the Civil Contingencies Act and result in both inability to service the community and suffer reputational damage.</p> <p><b>SLT Risk Owner:</b> John Ward. <b>Responsible Officer:</b> Helen Belenger/Warren Townsend.</p>					
<b>Original and Target Risk Assessment</b>					
<b>Original Risk Date</b>	31-Jul-2012		<b>Target Risk Date</b>	31-Mar-2019	
<b>Original Risk Score</b>	9		<b>Target Risk Score</b>	3	
<b>Current and Previous Quarter Risk Assessment</b>					
<b>Current Assessment Previous Quarter Assessment</b>	09-Mar-2018		6		
	04-Jan-2018		6		
<b>Internal Controls</b>					<b>Current Status</b>
Robust BC Plans	<ol style="list-style-type: none"> <li>1. Refresh Business Impact Assessment (B.I.A).</li> <li>2. Critical services to prepare plans.</li> <li>3. Test Plans.</li> <li>4. Retrain where necessary, embed BC into culture of the council.</li> <li>5. Identify system to store BC plans.</li> </ol>				Good



## Appendix 2 (a)

	<ul style="list-style-type: none"> <li>6. Non critical services to make appropriate arrangements.</li> <li>7. Audit of Plans in high risk service areas.</li> <li>8. Effective backup of data.</li> </ul>	
BC Management Strategy	<ul style="list-style-type: none"> <li>1. Annual BCM corporate meetings held.</li> <li>2. Key managers identified for BC plans.</li> <li>3. Articles for team briefs or management forum to embed BC planning into organisation.</li> </ul>	Good
Disaster Recovery Team	<ul style="list-style-type: none"> <li>1. Training and repeated messaging to embed BC cultural into organisation.</li> <li>2. Annual appraisals targets for Divisional Managers and relevant staff.</li> </ul>	Good
<b>Latest Position Statement</b>		
09 Mar 2018	<p>Whilst the internal controls are good for business continuity, the risk score is always likely to continue to remain the same because the impact is serious and the likelihood is possible rather than unlikely. The main reason for this is the continuing cyber-attack threats that the organisation continues to get. We have good mitigation against cyber-attacks; however there remains a risk. Physical controls against loss of IT or building are good and would be 'unlikely' and less of a risk.</p> <p>The recent poor weather enabled a live test of service business continuity plans.</p>	

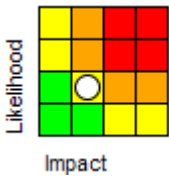
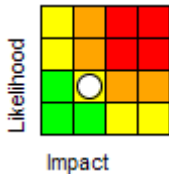
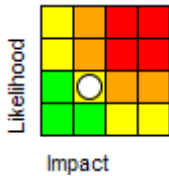
<b>CRR 68</b>	<b>Health and Safety</b>	<b>Management</b>	Controlled
		<b>Corporate Links</b>	Corporate Plan Priority - Use Resources Effectively and Efficiently.
<b>Risk Description:</b> Failure to adhere to H&S policies and procedures leading to death or serious injury of an employee or third party resulting in prosecution under H&S legislation, adverse publicity, fines and possible prison sentences. Such failures may also lead to civil claims for compensation			
<b>SLT Risk Owner:</b> John Ward.			
<b>Responsible Officer:</b> Helen Belenger/Warren Townsend.			
<b>Original and Target Risk Assessment</b>			
<b>Original Risk Date</b>	03-Sep-2013		<b>Target Risk Date</b>
<b>Original Risk Score</b>	9		<b>Target Risk Score</b>
			31-Mar-2019
			
			4
<b>Current and Previous Quarter Risk Assessment</b>			
<b>Current Assessment Previous Quarter Assessment</b>	09-Mar-2018		4
	04-Jan-2018		4
<b>Internal Controls</b>			<b>Current Status</b>
H&S policies & procedures	Clear health and safety policies, procedures and guidance are available to all staff and members via intranet and in hard copy format at some sites including: 1. Statement of intent. 2. Hierarchy for communication/organisation. 3. Roles and responsibilities. 4. H&S arrangements.		Good

## Appendix 2 (a)

	<ul style="list-style-type: none"> <li>5. Policies, procedures and guidance for specific H&amp;S issues e.g. control of contractors, COSHH assessments forms etc.</li> <li>6. An extensive range of evidence compliance forms.</li> <li>7. Specific risk assessments for site visits undertaken for staff and member visits.</li> <li>8. Quarterly updates to Cabinet member for Corporate Services by the H&amp;S Manager.</li> </ul>	
Training Programme & Competencies	<ul style="list-style-type: none"> <li>1. Specific training programmes for all aspects of H&amp;S skills and competencies required with the Council's business.</li> <li>2. Staff names with relevant competencies and holding key responsibilities available on staff intranet.</li> <li>3. Training records maintained to evidence training provided.</li> <li>4. Training for all new members as part of the Members' Induction Programme.</li> </ul>	Good
Legionella Testing	<ul style="list-style-type: none"> <li>1. Written policy available.</li> <li>2. Regular testing and monitoring to demonstrate compliance.</li> <li>3. Staff involved in legionella management or may be exposed to legionella risk are provided with training.</li> </ul>	Good
Quarterly service meetings for high risk service areas	<ul style="list-style-type: none"> <li>1. CCS - Quarterly insurance &amp; H&amp;S meetings with the Director of Residents' Services &amp; the Contract Services Divisional Manager with the Financial Services Divisional Manager, insurance officer, H&amp;S Corporate Manager &amp; CCS Technical Supervisor. To assess accident trends and claims and agree any actions required to staff duties, policies and procedures.</li> <li>2. Culture &amp; Place - Quarterly insurance &amp; H&amp;S meetings with Director of Growth &amp; Place Services and the Divisional Service Managers for the museum, Westgate Leisure contract, and car park service, to discuss claims &amp; accidents to identify any necessary changes to procedures/policies etc.</li> <li>3. All accidents, near misses and reports of ill health are investigated by the Corporate H&amp;S team. Interventions made with the service where appropriate to improve systems of work to prevent reoccurrence.</li> </ul>	Good
PAT testing	<ul style="list-style-type: none"> <li>1. Annual testing of all electrical equipment carried out by qualified contractor.</li> </ul>	Good
Fire Safety of all Council Owned Premises	<ul style="list-style-type: none"> <li>1. Fire Risk Management Group – Quarterly meetings held to develop and monitor action plans following fire assessments results with the Directors of Corporate Services, Housing &amp; Communities, and Growth &amp; Place Services plus other relevant council officers.</li> <li>2. Fire Risk Assessments of all premises undertaken.</li> <li>3. Priority and timescales to be agreed for any remedial works or maintenance required on properties following fire risk assessment results.</li> </ul>	Improving
Safety Committee	<ul style="list-style-type: none"> <li>1. A group of managers and employees meet 3 times a year to discuss health and safety issues and matters of interest. CCS and car parks have local 'Safety Forums', meeting bi-monthly, that feed into this committee. The Safety Committee reports any issues of significance to the JECP.</li> </ul>	Good
Caution Alert Register (CAR)	<ul style="list-style-type: none"> <li>1. Specific procedures and decision tree guidance in place for staff and members to follow on staff intranet.</li> <li>2. Nominated person CR Keeper who maintains register and advises staff.</li> <li>3. Procedures in place for appropriate staff and members to access CAR.</li> <li>4. Compliance with data protection legislation included in policies and procedures.</li> <li>5. Violence &amp; aggression response team available to support staff and members at EPH if an incident occurs.</li> </ul>	Good

## Appendix 2 (a)

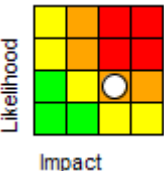
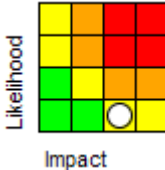
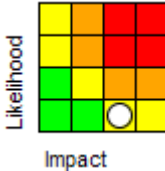
	6. Two levels of Violence & Aggression (V&A) resolution training provided to relevant staff.	
Emergency arrangements for Council Premises	<ol style="list-style-type: none"> <li>1. Evacuation procedures in place for EPH on staff intranet.</li> <li>2. Known competent staff with allocated roles &amp; responsibilities for evacuation procedures.</li> <li>3. Regular testing of evacuation procedures carried out.</li> <li>4. Policy advising the arrangements in place for safe evacuation of council owned buildings.</li> </ol>	Good
Corporate H&S Audits & Action Plans for Service H&S Improvement	<ol style="list-style-type: none"> <li>1. Programme of H&amp;S audits of service areas, improvements and observations which are fed back to Service, H&amp;S and management with any necessary improvement action plans. Progress with recommendations made are reviewed after an agreed period.</li> <li>2. In addition, there is a programme of audits in place for the SLM leisure centres contract. This involves checking H&amp;S performance and compliance in key identified areas.</li> </ol>	Good
Contract Management	<ol style="list-style-type: none"> <li>1. Every major contract should have an identified contract manager who is responsible for ensuring the delivery of the contract in accordance with specification.</li> <li>2. The contractor manager must ensure that their contractor adheres to H&amp;S legislation in carrying out the specification and has a monitoring system in place which is also including performance reporting to the council's contract manager.</li> <li>3. Upon request the H&amp;S manager will attend regular quarterly/annual meetings for the council's specific high risk activity contracts along with the contract manager, to liaise with the contractors regarding any H&amp;S concerns.</li> <li>4. Members are involved in major decisions on procurement matters.</li> </ol>	Good
<b>Latest Position Statement</b>		
09 Mar 2018	The consequences of a serious accident or incident at work have the potential to be 'major', i.e. death of a member of staff, contractor or member of the public. Therefore the severity in the risk score is always going to be high. However, due to the operation of an effective H&S management system there are good controls in place to reduce the likelihood of such an incident. Despite having good systems and procedures in place, CCS remains the highest risk operation within the Council due to the nature of the work, along with H&S compliance of CDC's biggest contractor.	

<b>CRR 145</b>		<b>Data Protection Act Breach - Loss of Data</b>		<b>Management</b>	Controlled
				<b>Corporate Links</b>	
Failure to keep all personal data secure leading to a breach of the General Data Protection Regulations (GDPR) and Data Protection Act, resulting in fines and reputational risk.					
<b>SLT Risk Owner:</b> John Ward <b>Responsible Officer:</b> Nick Bennett					
<b>Original and Target Risk Assessment</b>					
<b>Original Risk Date</b>	16-Mar-2017			<b>Target Risk Date</b>	31-Mar-2019
<b>Original Risk Score</b>	4			<b>Target Risk Score</b>	4
<b>Current and Previous Quarter Risk Assessment</b>					
<b>Current Assessment Previous Quarter Assessment</b>	12-Mar-2018			4	
	05-Jan-2018			4	
<b>Internal Controls</b>					<b>Current Status</b>
Data protection Officer	Divisional Manager of Democratic Services is the designated Data Protection Officer providing advice to officers, advising on safe sharing of data between agencies, overseeing data subject access requests and liaison with Information Commissioners Office in the event of customer complaint or security breach.				Good
Protocols and Policy in place	Data Protection Policy is in place to provide advice and guidance for staff and customers. Internal protocols and processes are in place to manage/limit risk of data loss. Updating processes to comply with new guidance under GDPR is underway.				Improving

## Appendix 2 (a)



Staff Training	Data Protection training is provided to all new staff and Members. Staff online training is available to allow staff to refresh their knowledge. Specific GDPR module for all staff is in place, manager training day has been held.	Improving
Data backed up	All electronic data is backed up daily and securely stored off-site.	Good
Secure devices	All staff laptops are encrypted to secure data. All mobile phones are provided with secure application to protect data. Dual authentication in place for remote access to data.	Good
PSN Compliance	The authority is taking steps to meet new certification requirements in accordance with the updated requirements of the Public Services Network requirements for provision of a secure network.	Good
Safe transfer of personal data	Personal and sensitive data shared with other government agencies is transferred via GCSX secure email accounts. A review of processing has been completed as part of GDPR approach.	Good
Safe destruction of confidential documents	All hard copies of confidential papers are shredded prior to disposal.	Good
<b>Latest Position Statement</b>		
12 Mar 2018	General Data Protection Regulations (GDPR) come into effect 25 May 2018 replacing the Data Protection Act. Corporate project team in place to manage transition to new regulations. Position statement reports being presented on an ongoing basis to Corporate Governance and Audit Committee as well as SLT and JECF. Monthly guidance being provided by DPO to all Divisional Managers. Member training will be delivered on GDPR in May 2018.	

**Management** Control Pending

<b>CRR 88</b>	<b>Non Achievement of Recycling Target of 50% by 2020</b>	<b>Management</b>		Control Pending	
		<b>Corporate Links</b>			
The current recycling target set for 2020 is 50%. The failure to achieve this target could mean the Council may incur significant fines, taxes or extra landfill taxes or reputational damage.					
<b>SLT Risk Owner:</b> Jane Dodsworth <b>Responsible Officer:</b> Bob Riley					
<b>Original and Target Risk Assessment</b>					
<b>Original Risk Date</b>	28-Nov-2014			<b>Target Risk Date</b>	01-Jan-2020
<b>Original Risk Score</b>	6			<b>Target Risk Score</b>	3
<b>Current and Previous Quarter Risk Assessment</b>					
<b>Current Assessment</b> <b>Previous Quarter Assessment</b>	09-Mar-2018			3	
	21-Dec-2017			3	
<b>Internal Controls</b>				<b>Current Status</b>	
Initiatives to increase amount of recycling		1. New initiatives to increase recycling rates are being implemented and further work to improve the quality of the waste for recycling collected are under consideration. 2. A Waste & Recycling Panel has been established to drive forward initiatives and improvements.			Improving



<b>Latest Position Statement</b>	
09 Mar 2018	<p>Recycling rate is currently 43%.</p> <p>Whilst the target is embedded within national legislation, but it is uncertain whether a financial penalty would be applied.</p> <p>Actions to mitigate were within current work programme of West Sussex Waste Partnership and Recycling Action plan to increase recycling rates.</p>



<b>CRR 147</b>		<b>Southern Gateway Regeneration</b>		<b>Management</b>	Control Pending
				<b>Corporate Links</b>	
<p>Failure to deliver the outcomes of the project leading to financial exposure to CDC as lead partner, and potential repayment of the Local Enterprise Partnership (LEP) (and other funding).                  Lack of engagement or buy in by other key partners, leading to CDC being isolated and unable to deliver outcomes.                  Masterplan becomes commercially unviable due to certain market sectors' changes including demands for community/public realm use types.</p> <p><b>SLT Risk Owner:</b> Paul Over / Jane Hotchkiss  <b>Responsible Officer:</b> Victoria McKay</p>					
<b>Original and Target Risk Assessment</b>					
<b>Original Risk Date</b>	23-Feb-2018			<b>Target Risk Date</b>	28-Sep-2018
<b>Original Risk Score</b>	9			<b>Target Risk Score</b>	3
<b>Current and Previous Quarter Risk Assessment</b>					
<b>Current Assessment</b>	06-Mar-2018			9	
<b>Previous Quarter Assessment</b>					
<b>Internal Controls</b>					<b>Current Status</b>
Partner Organisation Engagement	1. Law Courts - HCA hand over. Close liaison with HCA with contingency built into Masterplan. 2. WSCC Land – Close liaison with relevant officers.				Poor
Strategic Land Owner Engagement	1. Memorandum of Understanding (MOU) signed. 2. Steering Group / Growth Board to approve Growth Deal and on-going liaison with other partners. 3. Relocation of Royal mail & Stage coach - Estates service and external consultants are working to identify suitable sites.				Poor
Financial Controls & Budget Monitoring	1. Identifying potential abnormal costs as early as possible by undertaking key studies in advance e.g. flooding, contamination and drainage. 2. Relocation funding from key partners - Timely reapplication to LEP/HCA and exploring alternative funding routes as necessary.				Poor

## Appendix 2 (a)

Management of External Consultants	<ol style="list-style-type: none"> <li>1. Contract T&amp;C's for consultants employed to ensure delivery of service.</li> <li>2. Availability of consultancy advice - Use tried and tested framework agreements to source expertise; test knowledge via tendering process.</li> </ol>	Good
Masterplan	<ol style="list-style-type: none"> <li>1. Demand in market sector changes - Constant updating of viability advice for the Masterplan as the project is implementation proceeds.</li> <li>2. Road space configuration - WSCC Highways input to project team to ensure solution(s) are acceptable.</li> <li>3. Community or Public Realm Uses for site - Steering group input and regular re-appraisal of the scheme as it progresses.</li> </ol>	Improving
Compulsory Purchase Order (CPO)	<ol style="list-style-type: none"> <li>1. Use of CPO if required for land acquisitions for Masterplan assembly, where unable to agree terms to complete acquisitions.</li> <li>2. Use of consultancy support to ensure CPO grounds well founded, including independent valuations.</li> </ol>	Improving
<b>Latest Position Statement</b>		
06 Mar 2018	<p>Property consultants were appointed on 8th August 2017 and Legal consultants will be appointed by end March 2018. Archaeology and contamination reports have been commissioned and completed.</p> <p>A Waste Water Treatment (WWT) study has been commissioned and we await the results. Services, flooding and topographical studies are to be commissioned by the end Jan 2018. To date (23rd Jan 2018), funding applications to One Public Estate, Home &amp; Communities Agency (HCA) (Starter Homes) and LEP (£5,000,000) have been submitted and approved. A further funding bid to WSCC is dependent on the signing of the Growth Deal, which was approved by CDC Council on 23rd Jan 2018 and WSCC in Feb 2018.</p> <p>Work to identify and formalise the relocation sites for Stagecoach and the Royal Mail continues and once agreements have been reached will be reported to Cabinet for consideration.</p> <p>Negotiations between CDC, WSCC and Homes England are progressing on the way in which we organise ourselves to put the site on the market. CPO advice has been obtained and a request to approve the use of CPO powers in principle was requested at Council/Cabinet in March.</p> <p>A specification for legal general advice to the project is being finalised before conducting an OJEU appointment process. Publicity material on the development, to be used in a variety of situations, has been produced. It was used for the first time at a meeting of the Portsmouth and Southampton Business Association and Sitematch on 8 February.</p>	

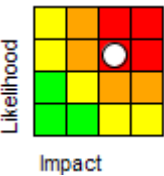
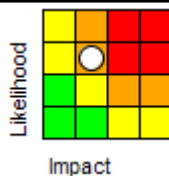
<b>CRR 148</b>		<b>Local Plan</b>		<b>Management</b>	Control Pending
				<b>Corporate Links</b>	
<p>Failure to complete Local Plan Review and achieve an adopted Local Plan by 2020. This would mean that the Council would face challenge that it does not have an up to date Local Plan and the impact would be:</p> <ul style="list-style-type: none"> <li>• Without an up to date Local Plan the presumption in favour of sustainable development would apply, assessed against the policies in the National Planning Policy Framework (ref: para 14).</li> <li>• 5 year housing land supply (HLS) would be assessed against the objectively assessed need (OAN) for housing rather than the housing requirement figure in the Local Plan, making it highly likely that it would not be able to demonstrate a 5 year HLS.</li> <li>• Both 1 &amp; 2 would result in a loss of control over the location and form of development with decisions being made through the application and appeal process, rather than in accordance with the development plan as it would be considered to be out of date.</li> <li>• With respect to the Local Plan Review, the 40% cap applied to the OAN for housing in the government’s draft methodology would not apply and the amount of housing to be provided for in the LPR would increase substantially requiring an increase in the amount of land to be allocated for development.</li> <li>• The ability to plan and coordinate development with the provision of infrastructure would be reduced with an unplanned approach to the location of new development.</li> <li>• The potential for government intervention to take plan-making decisions out of the control of the Council.</li> <li>• Damage to the reputation of the Council for failing to produce a plan to guide and control development in line with its statutory duties as Local Planning Authority.</li> </ul> <p><b>SLT Risk Owner:</b> Andrew Frost  <b>Responsible Officer:</b> Mike Allgrove</p>					
<b>Original and Target Risk Assessment</b>					
<b>Original Risk Date</b>	07-Mar-2018			<b>Target Risk Date</b>	31-Jul-2020
<b>Original Risk Score</b>	9			<b>Target Risk Score</b>	3
<b>Current and Previous Quarter Risk Assessment</b>					
<b>Current Assessment</b>					
<b>Previous Quarter Assessment</b>	07-Mar-2018				9

## Appendix 2 (a)

Internal Controls		Current Status
Agreed Timetable for Plan Production	1. Statutory Local Development Scheme agreed by Council. Detailed project plan for evidence base and plan production prepared.	Good
Sufficient Staff Resources to achieve timetable	1. Additional posts created in team. 2. Recruitment incentive payment and premia payments agreed to recruit and retain staff.	Improving
Ensure evidence base provided to meet timetable	1. Detailed project plan prepared for evidence base.	Poor
Member agreement to contents of plan	1. Provision of information, debate and discussion through Member briefings, Development Plan and Infrastructure Panel and formal democratic decision making process through Cabinet and Council.	Improving
Public Consultation	1. Public consultation to ensure that the views of the community are taken in to account in the plan-making process. 2. Initial public consultation has taken place on issues and options. 3. There will be further public consultation on a draft plan and then again prior to examination. This will enable the Council to take in to account the views of all interested parties on the contents of the plan and outstanding matters can resolved through the public examination in to the soundness of the plan (to be conducted by a planning inspector appointed by the Secretary of State). The current status will reflect the stage of consultation reached.	Improving
Latest Position Statement		
07 Mar 2018	<p>The detailed project plan for the production of the evidence base and plan writing is extremely tight with no contingency built in. The Policy Team has had insufficient staff resources to progress the evidence base according to the timetable due to the need to fill vacant posts and long term sickness absence, notwithstanding the use of temporary staff. The situation is improving with 3 new members of staff due to join the team in the short term and the recent appointment of a Neighbourhood Planning Officer. Certain aspects of the evidence base cannot be progressed until decisions have been made about the likely distribution of development.</p> <p>Due to the need to ensure the agreement of West Sussex County Council and Highways England, the Transport Study has not progressed according to the anticipated timetable and is unlikely to be completed before the July Cabinet and Council meetings, although the headline results should be available. This is contingent of being able to advise the consultants on a likely distribution of development. The initial results of the Gypsy and Traveller Accommodation Assessment are showing the need to made provision for a significant increase in the number of pitches to be provided for in the plan. There are concerns about the Waste Water Treatment Study and whether it will be fit for purpose. Landscape work still needs to be commissioned.</p> <p>In terms of plan production some progress has been made on the selection of strategic sites and the distribution of parish housing requirements. However, further progress needs to be made on the site selection process for horticultural development areas and employment land and the drafting of individual policies.</p> <p>There has been some initial member engagement on the distribution of development; however, it will be difficult to secure agreement given</p>	

	<p>the significant amount of land to be identified for development, local opposition to new development and the absence of a complete evidence base. In particular, the need to identify mitigation for the transport impacts of development, especially with regard to the A27 Chichester Bypass, is likely to prove difficult to resolve.</p>
--	---

	<p>The delay until the summer 2018 of the outcome of the Government's consultation on Objectively Assessed Needs (OAN) and Housing numbers will impact on the progress of the local plan in relation to housing numbers and the identification of strategic housing sites.</p>
--	--

<b>CRR 149</b>	<b>Impact of Universal Credit (UC) on working claimants across the district</b>		<b>Management</b>	Control Pending
			<b>Corporate Links</b>	
<p>Failure to provide appropriate support and guidance for claimants affected by the welfare reforms, including the rollout of Universal Credit (UC) on working age claimants across the district, resulting in the risk of rent arrears and the threat of homelessness. The benefits service currently administers in excess of 3,800 working age Housing Benefit claims. Full UC service in the district has been delayed until July 2018. The roll out will initially only affect new claims, although the majority will transition across over a period of 12-18 months.</p> <p><b>SLT Risk Owner:</b> Louise Rudziak / Jane Dodsworth  <b>Responsible Officer:</b> Linda Grange / Diane Kirkham</p>				
<b>Original and Target Risk Assessment</b>				
<b>Original Risk Date</b>	02-Mar-2018		<b>Target Risk Date</b>	31-Mar-2019
<b>Original Risk Score</b>	9		<b>Target Risk Score</b>	3
<b>Current and Previous Quarter Risk Assessment</b>				
<b>Current Assessment</b>	19-Mar-2018			6
<b>Previous Quarter Assessment</b>				
<b>Internal Controls</b>				<b>Current Status</b>
UC Focus Group	<p>Initial meeting April 2017 identified the challenges our largest RP (Registered Provider) had experienced locally and nationally. Identified challenges that could reduce impact on claimants and prevent homelessness and agreed to:</p> <ul style="list-style-type: none"> <li>• support vulnerable claimants</li> <li>• prepare claimants for the transition</li> <li>• assist claimants with their online UC claims</li> <li>• hold multi agency events to raise awareness</li> <li>• deliver pre and post tenancy workshops on money management</li> <li>• identify suitable venue and volunteers to run the workshops</li> <li>• identify resource requirements to deliver</li> </ul>			Improving

## Appendix 2 (a)

	Some mitigation has been put into place, for example, by contracting to CAB for debt advice and recruitment of Tenancy Sustainment Officers and a Housing Welfare Officer.	
Nomination of a formal UC lead within the Housing Advice Team	In compliance with Homelessness Reduction Act s.179(2)(g) "The service must be designed to meet the needs of persons in the authority's district including, in particular, the needs of any other group that the authority identify as being at particular risk of homelessness in the authority's district." The Housing Advice Team have nominated a UC lead who will be responsible for coordinating advice to UC claimants that present seeking housing services assistance.	Improving
Register Provider eviction protocol	There is an intention to create a Register Provider eviction protocol so that the Council is warned in advance where there is a risk of homelessness, this will include tenants in receipt of UC, in arrears and where possession proceedings have been instigated. The lead officer conducting this piece of work has been briefed.	Improving
Increase number of units of Council owned temporary accommodation (TA).	On 31 October 2017 CDC purchased 22 Freelands Close. Three, 1 bed units were in use as TA (Temporary Accommodation) from December 2017 with a fourth unit due to be available in March 2018. The Council are considering options to redevelop the site and increase the number of units to a maximum of 12.	Good
Impact on services	<ul style="list-style-type: none"> <li>Benefit service will be impacted by transfer of WA claims to UC. Exceptions to UC, pensioner HB claims and CTR claims for WA and pensioners will continue to be administered. Revenues and Benefits Management team will continually review impact of rollout and resource requirements, as necessary</li> <li>Housing service may result in increased demand for services, as above, nominated UC lead officer to coordinate housing advice requirements</li> </ul>	Good
Claimant support	<ul style="list-style-type: none"> <li>Minimal funding received from DWP to assist claimants with submitting and managing their online UC claims</li> <li>6 kiosk style PC's located in main reception for claimants to use, any assistance to be provided by benefits staff</li> <li>Minimal funding also received to provide PBS (personal budgeting support) cases would be referred from DWP. Currently engaging with CAB to provide this service as the rollout takes effect</li> <li>Publicity for claimant engagement to be arranged as soon as confirmation of roll out date received</li> </ul>	Good
Staff awareness and training	<ul style="list-style-type: none"> <li>DWP training for staff postponed, new dates not yet arranged</li> <li>Internal staff training options being considered</li> </ul>	Improving
<b>Latest Position Statement</b>		
09 Mar 2018	Since the announcement to postpone the full roll out of Universal Credit in Chichester until July 2018, on 23 November the Chancellor of Exchequer, as part of the 2017 Autumn Budget, outlined some changes for Universal Credit. This was followed up on 24 November by a	

speech in the House of Commons from David Gauke MP, Secretary of State for DWP outlining some further changes. These included:

- confirmation that Westward House is considered to be 'temporary accommodation' and therefore will continue to be eligible for Housing Benefit.
- the removal of the 7 day waiting period for new claims.
- claimants who were previously receiving HB and are transitioning onto UC will receive a transitional payment of 2 weeks support
- claimants will be able to request that their housing costs are paid direct to their landlord regardless of tenure.

Despite the announced changes there have been no further notifications about the transition to full service in July 2018 from the DWP.

The CTR scheme is continually monitored to assess the impact of the welfare reform and the use of this scheme to support relevant claimants.

SLT will receive a report from officers in May setting out full details of the mitigations in place at the council.