Corporate Risk Register - Strategic Risks Quarterly Update

Report Author: Helen Belenger **Generated on:** 17 March 2017



	Risk Status							
	Alert							
	High Risk							
	Warning							
0	ОК							
?	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	JW	9	6	4	3	31-Mar- 2018	Good
	CRR 08	Skills / Capability / Capacity	PEO	3	6	3	2	31-Mar- 2018	Good
	CRR 09	Business Continuity	JW	9	6	6	3	31-Mar- 2018	Good
	CRR 68	Health and Safety	JW	9	4	4	4	31-Mar- 2018	Good
	CRR 97	Cyber Risk Attack Across ICT Estate	PEO	6	6	6	6	31-Mar- 2018	Good
	CRR 145	Data Protection Act Breach - Loss of Data	PEO	4	-	4	4	31-Mar- 2018	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	BR	6	6	6	3	01-Jan- 2020	Improving
	CRR 98	Devolution of Public Services	DS	9	9	3	3	31-Mar- 2018	Improving

	Management	Controlled
CRR 01 Financial Resilience	Corporate links	Corporate Plan Priority - Use Resources Effectively and Efficiently.

Risk Description:

- 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.
- 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.

Risk Assessment

- Failure to maximise income streams.
- Unpredictable Government policy (e.g. Brexit and localisation of business rates.)

SLT Risk Owner: Diane Shepherd **Responsible Officer**: John Ward.

				KISK ASSESSIFICIT				
po Po	Assessment Date	31-Dec-2016	po	Date Reviewed	06-Mar-2017	poo	Target Date	31-Mar-2018
Likelihood	Previous Quarterly Score	6	lmpact	Current Score	4	Impact	Target Score	3
Internal Contro	ols							Current Status
Five Year Financial Model and Deficit Reduction Plan 1. Monitor and update the 5 year financial model as required and review with CMT. 2. Assess against progress on Deficit Reduction Plan and savings targets. 3. Monitor income volatility in relation to use of NHB (Policy approved) and localisation of both CTS & NNDR.						Good		
Income Streams						Good		
Reconciliation of In	1. Monthly reconciliations by services. 2. Non compliant services are identified by Internal Audit when service is reviewed as part of the Audit Plan. 3. Support given by Accountancy Services when setting up new income streams and reconciliation processes.							
Control of Expendit	xpenditure 1. Approval limits and routes for additional funding are detailed in the Council's Constitution and Financial Regulations.						Good	

	2. Quarterly monitoring of major variances by CMT.	
Financial Strategy Principles	 All key decisions of the Council should relate back to the Corporate Plan. Ensure the revenue and capital programme remain balanced and sustainable over a rolling 5 year period. Over the next 5 years maintain a position of non-dependency on reserves. 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. Review costs in response to changes in service demand. 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. Continue to review the Council's costs in order to find further savings. Match Council Tax increases to a realistic and affordable base budget. Budgets should be pooled with other service providers to achieve more effective and cost efficient outcomes for the community. 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. 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. 	Good
Revenue and Capital Programme Principle	 Capital receipts, reserves and interest on investment will primarily be available for new investment of a non-recurring nature, thereby minimising the overall financial risk. 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. 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. 	Good
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

Latest Position Statement

Deficit reduction plan approved, and accepted by DCLG as evidence to secure 4 year funding agreement. Financial targets to be monitored through the programme boards.

The council continues to set balanced budgets, non-reliance on NHB and other temporary funding, and has a forward funded 25 year asset replacement fund.

Controls for income reconciliation have improved at CCS using the BARTEC system. Currently car parks are been given extra support by accountancy to aid their income reconciliation this year.

	Management	Controlled
CRR 08 Skills / Capability / Capacity	Corporate links	Corporate Plan Priority - Use Resources Effectively and Efficiently.

Risk Description:
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.

SIT Dick Owner: Daul Over

SLT Risk Owner: Responsible Offic	Paul Over. er : Jane Dodsworth	/ Tim Radcliffe.							
	Risk Assessment								
poo	Assessment Date	31-Dec-2016	po O	Date Reviewed	08-Feb-2017	poo	Target Date	31-Mar-2018	
Impact	Previous Quarterly Score	6	Impact	Current Score	3	Impact	Target Score	2	
Internal Contro	ls							Current Status	
Workforce Development Plan 1. Ensure commissioning and objectives remain relevance 2. Review personnel literature, marketing CDC as an expression of 3. CDC salaries - benchmarking exercise to be undertaken 4. New apprenticeship Levy.				rketing CDC as an en	nployer at recruitr			Good	
Appraisal Process		 Succession planning considered during appraisal process. Completion of appraisals on time. Strategic training needs identified using Belbin or equivalent. Possible use of 360 degree appraisals. 							
Training Plan and Bu	ıdget	2. Use diploma n	nanagement studi	to develop new mana es for senior manage new Directors and H	rs.			Good	
Recruitment Benefits	5	1. Use of benefits packages for relocation, assisted house purchase scheme to aid recruitment. 2. Guidance to be issued for how to use recruitment benefits.							
Staff Satisfaction Survey 1. Staff survey to be undertaken after NWOW project.					Improving				
Strategic Leadership Service	Team & Heads of		ng programme del an currently being	ivered to SLT & HoS put into place.	to address core co	ompetencies.		Good	

APPENDIX 1 (a)

Measuring Staff Turnover by Significant	1. SLT to review turnover statistics and the reasons.	Cood
Groups		Good

Latest Position Statement

Risk score reduced from 6 to 3 (probable likelihood (3) but impact reduced to contained within service area (1 Minor) as a number of initiatives now in place since risk identified to allow service areas more flexibility in addressing skills shortages.

Apprenticeship Levy to come into effect 1.4.17 to progress increase in apprenticeships.

Workforce development initiatives now live to provide mentoring, high potential achievers and appointment of interns and apprentices. Managers trained in mentoring skills.

Pay Policy report approved by Cabinet 6 Sept 2016 to undertake job redesign exercise to be implemented wef March 2018. Enhancements approved to staff benefits package approved by Cabinet. Interim issues will be addressed on a case by case basis.

Staff turnover is currently less than 10%.

	Management	Controlled
CRR 09 Business Continuity	Corporate links	Corporate Plan Priority - Use Resources Effectively and Efficiently.

Risk Description:

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.

SLT Risk Owner: Diane Shepherd. **Responsible Officer**: John Ward.

Risk Assessment								
po	Assessment Date	31-Dec-2016	poo	Date Reviewed	08-Feb-2017	poo	Target Date	31-Mar-2018
Impact	Previous Quarterly Score	6	Impact	Current Score	6	Geliho	Target Score	3
Internal Controls							Current Status	
Robust BC Plans		1. Refresh Busin	ess Impact Assess	ment (B.I.A).				

Internal Controls		Status
Robust BC Plans	 Refresh Business Impact Assessment (B.I.A). Critical services to prepare plans. Test Plans. Retrain where necessary, embed BC into culture of the council. Identify system to store BC plans. Non critical services to make appropriate arrangements. Audit of Plans in high risk service areas. Effective backup of data. 	Good
BC Management Strategy	 Annual BCM corporate meetings held. Bi-annual CMT review meetings held. Key managers identified for BC plans. Articles for team briefs or management forum to embed BC planning into organisation. 	Good
Disaster Recovery Team	 Training and repeated messaging to embed BC cultural into organisation. Annual appraisals targets for HoS and relevant staff. 	Good

Latest Position Statement

The risk score remain the same as HoS are currently in the process of reviewing their BC plans following a refresh of the Business Impact Assessments (BIA). They have been given until the end of March to complete the review and after that date the Corp. H&S team will be critically reviewing the plans to make sure they are robust and are capable/achievable within the timescales in the BIA's.

Management Controlled CRR 145 Data Protection Act Breach - Loss of Data Corporate Corporate Plan Priority - Use Resources Effectively and links Efficiently.

Risk Description:

Failures to keep all personal data secure leading to a breach of the Data Protection Act, resulting in fines and reputational risk.

SLT Risk Owner: Paul Over. Responsible Officer: Jane Dodsworth									
Risk Assessment									
New Risk	Assessment Date	15-Mar-2017	po	Date Reviewed	16-Mar-2017	poo	Target Date	31-Mar-2018	
	Previous Quarterly Score	-	Impact	Current Score	4	po o limpact	Target Score	4	
Internal Controls							Current Status		
Data protection Of	ficer	Head of Business Improvement Services is 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.							
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.							
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.							
Data backed up		All electronic data is backed up daily and securely stored off-site.							
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.							
PSN Compliance		The authority is certified in accordance with the requirements of the Public Services Network requirements for provision of a secure network.							
Safe transfer of personal data		Personal and sensitive data shared with other government agencies is transferred via GCSX secure email accounts.							
Safe destruction of confidential documents		All hard copies of confidential papers are shredded prior to disposal.							

Latest Position Statement

Targeted training for key officers whose role requires them to process personal or sensitive data is to be provided by an external provider in 2017-18 to refresh individuals' knowledge and increase awareness.

In the future the Council needs to consider the significant new burdens from the General Data Protection Regulations (GDPR) need to be achieved by 2019. Non-compliance could result in fines of £500k to 20 million Euros. Fines can be imposed on the organisation AND its officers.

An officer recently attended a briefing to aid local authorities a detailed timeline, setting out the steps required over the next two years to ensure compliance of the burdens placed by the General Data Protection Regulation (GDPR).

- From 25 May 2018 Payment Card Industry (PCI) compliance will be contained in the GDPR (General Data Protection Regulation)
- GDPR replacing 1998 Data Protection Act
- From May 2018 non PCI compliance will mean total non GDPR compliance
- Current non PCI compliance fines are regulated by payment acquirers (start at £9 p.m. with some incremental increases over period of time)
- Future non PCI compliance fines will be applied by ICO (suggested could exceed £100'sk)
- Data breach fines will be applied under a 2 tier system (GDPR)
 - £2m or 4% of annual turnover for non reported data breaches
 - £10m or 2% of annual turnover providing reported within 72 hours

All staff and members need to ensure that they follow advice and guidance regarding data security. Due to their roles, members are potentially regarded as the main source of risk for inadvertent breaches in data protection.

APPENDIX 1 (a)

CRR 68 Health and Safety Management Controlled Corporate links Corporate Plan Priority - Use Resources Effectively and Efficiently.

Risk Description: Failure to adhere to H&S policies and procedures leading to death or 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

SLT Risk Owner: Diane Shepherd. Responsible Officer: John Ward.

Risk Assessment									
Impact	Assessment Date	31-Dec-2016	Impact	Date Reviewed	08-Feb-2017	Impact	Target Date	31-Mar-2018	
	Previous Quarterly Score	4		Current Score	4		Target Score	4	
Internal Controls								Current Status	
H&S policies & procedures		Clear policy, procedures and guidance statements on H&S 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. 5. Policies, procedures and guidance for specific H&S issues eg. control of contractors, COSHH assessments forms etc 6. Evidence compliance forms. 7. Specific risk assessments for site visits undertaken for staff and member visits. 8. Regular updates to Cabinet member for Business Improvement Services by H&S Manager.							
Training Programme & Competencies		 Specific training programmes for all aspects of H&S skills and competencies required with the Council's business. Staff names with relevant competencies available on staff intranet. Training records maintained to evidence training provided. Training for all new members as part of the Members' Induction Programme. 							
Legionella Testing		 Written policy available. Regular testing and monitoring to demonstrate compliance. 							
Quarterly service meetings for high risk service areas		1. CCS - Quarterly insurance & H&S meetings with Director & Head of Contract Services with insurance, H&S Corporate & CCS H&S. To assess accident trends and claims and agree any actions required to staff duties,							

	policies and procedures. 2. Leisure & Wellbeing - Quarterly insurance & H&S meetings with Head of Commercial Services and service managers for the museum, Westgate Leisure and car park service, to discuss claims & accidents to identify any necessary changes to procedures/policies etc. 3. All accidents, near misses and reports of ill health are investigated by the Corporate H&S team. Interventions made with the service where appropriate to improve systems of work to prevent reoccurrence.	
PAT testing	1. Annual testing of all electrical equipment carried out by qualified contractor.	Good
Safety Committee	1. A group of managers and employees meet 3 times a year to discuss health and safety issues and matters of interest. Westgate and Westhampnett also have local 'Safety Forums', meeting bi-monthly, that feed into this committee. The Safety Committee reports any issues of significance to the JECP.	Good
Caution Alert Register (CAR)	 Specific procedures and decision tree guidance in place for staff and members to follow on staff intranet. Nominated person CR Keeper who maintains register and advises staff. Procedures in place for appropriate staff and members to access CAR. Compliance with data protection legislation included in policies and procedures. Violence & aggression response team available to support staff and members at EPH if an incident occurs. Two levels of Violence & Aggression (V&A) resolution training provided to relevant staff. 	Good
Emergency arrangements for Council Premises	 Evacuation procedures in place for EPH on staff intranet. Known competent staff with allocated roles & responsibilities for evacuation procedures. Regular testing of evacuation procedures carried out. Policy advising the arrangements in place for safe evacuation of council owned buildings. 	Good
Corporate H&S Audits & Action Plans for Service H&S Improvement	1. Programme of H&S audits of service areas, improvements and observations which are fed back to Service H&S and management with any necessary improvement action plans. These are reviewed again after an agreed period.	Good
Contract Management	 Every major contract should have an identified contract manager who is responsible for ensuring the delivery of the contract in accordance with specification. The contractor manager must ensure that their contractor adheres to H&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. The H&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&S concerns. Members are involved in major decisions on procurement matters. 	Good

Latest Position Statement

This is under continual review and improvement. The H&S Manager has not changed the risk score; however due to staffing issues in the H&S and Insurance team there has been a more reactive service operating for the latter part of 2016. Those issues are now resolved and the proactive work is now back in progress.

APPENDIX 1 (a)

Management Control Pending CRR 88 Non Achievement of Recycling Target of 50% by 2020 Corporate links 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. **SLT Risk Owner:** Steve Carvell Responsible Officer: Rod Darton **Risk Assessment** Assessment 06-Mar-2017 **Target Date** 31-Dec-2016 **Date Reviewed** 01-Jan-2020 Date Likelihood Likelihood Likelihood Previous 6 **Current Score** 6 Target Score 3 **Quarterly Score** Impact Impact Impact Current **Internal Controls** Status 1. New initiatives to increase recycling rates are being implemented and further work to improve the quality of Initiatives to increase amount of the waste for recycling collected are under consideration. Improving recycling 2. A Waste & Recycling Panel has been established to drive forward initiatives and improvements.

No change to current risk score.

CRR 98 Devolution of Public Services Management Control Pending Corporate links

- . Failure to engage in the process could potentially lead to CDC being isolated and therefore unable to influence and shape the process
- . Lack of Member buy-in to the process could stop the bid progressing
- . Transfer of extra responsibilities without matching fiscal powers
- . Heads of Terms and Governance proposal not acceptable
- . Continuation of duplication and disjointed service delivery
- . Failure to influence others' infrastructure programmes

SLT Risk Owner: Diane Shepherd **Responsible Officer**: Diane Shepherd

KISK ASSESSITION								
p o	Assessment Date	31-Dec-2016	poo	Date Reviewed	08-Feb-2017	po	Target Date	31-Mar-2018
Impact	Previous Quarterly Score	9	Impact	Current Score	3	Impact	Target Score	3
Internal Controls								Current Status
Officer Engagement in the 3SC Devolution Deal CEO involved with V Housing work stream streams;				Improving				
Member Engagemen 3SC Devolution Deal	Member Engagement/Agreement to the assC Devolution Deal 1. Members' workshop to be held once further details are available; Leader to work with other WS Leaders to ensure best outcome for the area.			er WS Leaders to	Improving			
	_							

Rick Assessment

Latest Position Statement

Government policy is unclear in this area. Work on 3SC bid has been deferred at least until May by which time government policy may become clearer. No further work is currently being undertaking by CDC at this point in time. The situation of this risk will be reviewed again after a high level meeting due to take place in May.