

**Committee Name: Audit**

**Committee Date: 08/03/2022**

**Report Title: Risk Management Update**

<b>Portfolio:</b>	Councillor Kendrick
<b>Report from:</b>	Executive director of corporate and commercial services (S151 officer)
<b>Wards:</b>	All wards
<b>OPEN PUBLIC ITEM</b>	

### **Purpose**

To provide an update on progress in relation to risk management.

### **Recommendation:**

To note the risk management report.

### **Policy Framework**

The Council has five corporate aims, which are:

- Aim 1 - People live independently and well in a diverse and safe city.
- Aim 2 – Norwich is a sustainable and healthy city.
- Aim 3 – Norwich has the infrastructure and housing it needs to be a successful city.
- Aim 4 – The city has an inclusive economy in which residents have equal opportunity to flourish.
- Aim 5 – Norwich City Council is in good shape to serve the city.

This report is relevant for all five corporate aims.

## **Report Details**

### **Background**

1. Risk management enhances strategic planning and prioritisation, assists in achieving objectives and strengthens the ability to be agile to respond to the challenges faced.
2. The purpose of this report is to provide an update on the progress made in embedding the council's risk management process and present the Q3 Corporate Risk Register. The report forms part of the twice-yearly updates to the audit committee on risk management, enabling the committee to fulfil its oversight function. At the request of the committee, performance in relation to information security incidents is also covered.
3. The purpose of this report is to provide an update on the progress made in embedding the council's risk management process and present the Q3 Corporate Risk Register.

### **Actions Taken**

4. Several actions have been taken since the last report to further enhance and embed the risk management process. These include:
  - Approval of the risk management strategy and policy by Cabinet in October 2021.
  - Developing Directorate risk registers which are fully populated with clear risk owners and actions identified.
  - Continued review by the corporate leadership team of the corporate risk register as part of the quarterly corporate performance review process and timetable.
  - Internal Audit conducted a Risk Management Maturity Assessment. The assessment has indicated that the council's current level of risk maturity is 'risk defined'. The council can demonstrate that a policy is in place and is communicated and that its risk appetite is defined. The review contained a number of recommendations including: a risk management training programme for relevant staff; review of risk registers against the updated risk management policy; and ensuring projects use the standard corporate risk management template.
  - Training on the council's risk management strategy and policy for the senior leadership team in January 2022, including guidance on risk identification, documentation and scoring.
  - Review and assessment of climate change risk (see paragraphs 6 to 11).
5. Whilst significant progress has been made, further work is needed to review all directorate risk registers to ensure documentation and scoring aligns to the updated policy and strategy. The internal audit recommendations are being taken forward and options for wider training on risk management for the organisation is being explored with the council's learning and development team.

## Focus on Climate Change Risk

6. Work is ongoing across the council to identify risks associated with climate change. This quarter each directorate has specifically considered the need to identify any risks associated with climate change.
7. Forecasts for Norwich's climate (for the 2020's, 2050's and 2080's) were updated based on the latest Met Office data, identifying wetter warmer winters and warmer drier summers. This is coupled with a predicted increase in population which will put increased pressure on services regardless of climate risks.
8. Based on these forecasts, initial analysis by the environment strategy team identified likely risk areas for the council's services and for the city. The key risks arise mainly from increased precipitation and storminess, and an increase in mean temperature and frequency and intensity of heatwaves. This presents a number of risks, from flooding of properties in the city to community health risks during periods of increased heat, the effects of which will not be felt evenly across the city, as those already disadvantaged will likely be disproportionately affected by climate change.
9. This initial analysis was followed up by detailed discussions with directorates, to ensure that risks were identified with enough specificity to enable good quality mitigation and decision making around response.
10. The risks identified are:
  - Community Services
    - Disruption to events
    - Risks to community health, with a particular focus on inequality as those affected by inequality are more likely to suffer disproportionately more from the adverse effects of climate change
  - Corporate and Commercial Services
    - Potential disruption to election delivery
    - Loss of staff productivity to heat
    - Risk in failure to properly resource climate change mitigation
  - Development and City Services
    - Increased maintenance of open spaces
    - Increase in emergency situations
    - Increase in demand for regulatory services
  - Cross-cutting risk (across Community Services and Development and City Services)
    - Structural risks to buildings (from increased heat, subsidence, potential flooding and storm damage) and consequent risk to delivery of services delivered via those buildings.
11. Work is currently underway to finalise risk scoring and action plans. Risks will be escalated where necessary to the level of management best placed to manage them effectively, i.e. those with higher scores, or those of a cross-cutting nature, may sit at the corporate level, whilst others will remain on directorate risk registers or sit at service level for ongoing management. It is also the case that for a number of identified risks, such as climate change impact on existing housing stock (e.g. thermal comfort) mitigation is already

in place (for example our strategic asset management plan commits to meeting MEES (minimum energy efficiency) standards, which requires all domestic rented properties to be at least a EPC E, guaranteeing a basic level of energy efficiency and thermal comfort.

### Q3 Corporate Risk Register

12. The corporate register has been updated to reflect feedback received from the action owners and reviewed by the Corporate Leadership Team. This is shown in full in **Appendix 1** and summarised in **Table 1**.
13. Two new risks have been escalated to the corporate risk register in relation to the delivery of the 2022 elections and delivery of acceptable levels of performance in regulatory services. The risk scores relating to Brexit has been reduced and the risk relating to cyber security and data protection compliance have been increased.

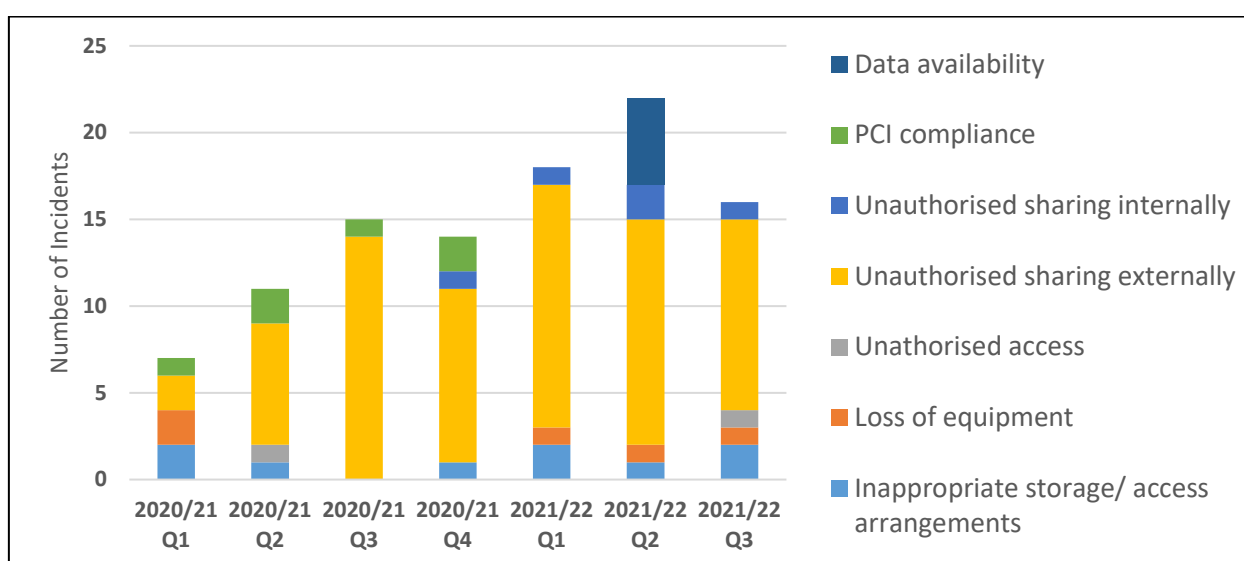
**Table 1:** Summary of Corporate Risk Register

	Q2 2021/22		Q3 2021/22		
	Current residual	Target	Current residual	Target	Movement from Q2
R1: Council Funding Medium-Long Term	15	10	15	10	↔
R2: Commercialisation	8	8	8	8	↔
R3: Health & safety in the workplace	12	8	12	8	↔
R4: Further Waves of Covid-19	12	12	12	12	↔
R5: Impact of Brexit	15	15	12	8	↓
R6: Business Continuity/Emergency Event	12	12	12	6	↔
R7: Cyber Security	12	12	20	15	↑
R8: Data Protection Compliance	9	9	12	8	↑
R9: Failure to fulfil statutory or legislative responsibilities - safeguarding	15	12	15	12	↔
<i>R10: Removed due to commercial confidentiality – see exempt appendix.</i>					
R11: Antisocial behaviour	16	6	16	6	↔
R12: Contract Management – Governance	12	9	12	9	↔
R13: Waste & Recycling	12	4	12	4	↔
R14: Health, Safety and Compliance in council homes and buildings	20	8	20	8	↔
R15: Anglia Square	16	8	16	8	↔
R16: Elections	New (escalated)		9	6	
R17: Failure to deliver acceptable levels of performance in regulatory services	New (escalated)		16	8	

## Information Security Risk Management

14. Information Security Incidents are logged when an employee, member, supplier or customer raises concerns about potential 'data breaches' as defined by the UK GDPR.
15. Incidents are logged and investigated by the Data Protection Officer (DPO) in line with the Corporate Information Incident Response Procedure. Decisions about the notification of both data subjects and the Information Commission's Office (ICO) are done on case-by-case basis taking a risk-based approach.
16. This report does not cover unsuccessful cyber-attacks on the organization. These would not count as a personal data breach, nor would this information be released into the public domain or to those without a business need to access it.
17. This quarter the Council has logged 16 incidents with the DPO. Of these:
- 0 reported to the data subject(s)
  - 1 reported to the Senior Information Risk Owner
  - 0 reported to the ICO
18. The Council has been in receipt of:
- 0 cases being investigated by the ICO
  - 1 case in which compensation has been requested and denied
  - 0 cases in in which compensation has been requested and agreed
  - 0 cases of a formal pre-action disclosure seeking compensation
19. There are no significant incidents that Audit Committee should be aware of for the previous quarter. Chart 1 shows the quarterly incidents by type.

**Chart 1: Data incidents by type**



20. The overall figure for Quarter 3 is six lower than last quarter and comparable to the same quarter last year.
21. The main type of incident the Council experiences continues to be unauthorised external sharing – usually this is multiple letters in a single envelope or an email to an incorrect recipient. Training needs identified have been addressed within teams to ensure control mechanisms are operating effectively.

### **Role of Audit Committee**

22. CIPFA's Position Statement on Audit Committees in Local Authorities and Police identifies the following core functions in relation to oversight of risk management arrangements:
- ensuring there is assurance over the governance of risk and top-level ownership and accountability
  - keeping up to date with the organisation's risk profile and the effectiveness of risk management actions
  - monitoring the effectiveness of risk management arrangements and supporting the development of good risk management practice.

### **Consultation**

23. The Corporate Risk Register has been reviewed by the Corporate Leadership Team. The full risk register reported to Cabinet on 23<sup>rd</sup> February.
24. This report forms part of the twice-yearly updates to the Audit Committee on risk management, enabling the committee to fulfil its oversight function.

### **Implications**

### **Financial and Resources**

25. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2019-22 and Budget. There are no proposals in this report that would reduce or increase resources and all risk management activities are currently carried out within approved and available budget provision.

### **Legal**

26. There are no specific legal implications arising from this report.

## Statutory Considerations

Consideration:	Details of any implications and proposed measures to address:
Equality and Diversity	No direct implications.
Health, Social and Economic Impact	No direct implications.
Crime and Disorder	No direct implications.
Children and Adults Safeguarding	No direct implications.
Environmental Impact	No direct implications.

## Risk Management

Risk	Consequence	Controls Required
The full corporate risk register is provided as an appendix to the report. The report itself does not pose an operational, financial, compliance, security, legal, political or reputational risk to the council.		

## Other Options Considered

27. There are no alternative options to this report.

## Reasons for the decision/recommendation

28. This report forms part of the twice-yearly updates to the audit committee on risk management, enabling the committee to fulfil its oversight function.

## Background papers:

None

## Appendices:

Appendix 1: Corporate Risk Register

Exempt Appendix 1: Corporate Risk Register Risk 10 (commercially sensitive)  
(see green papers of agenda pack)

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## Appendix 1: Corporate Risk Register Q3 2021/22

Risk: 1. Council Funding Medium- Long Term			Owner: Executive director of corporate and commercial services				Category: Finance & Resources		Risk Direction:	
			Target Risk				Current Residual Risk			
Description/Triggers	Impact	Mitigation	Date Raised	Impact	Likelihood	Score	Risk Strategy	Impact	Likelihood	Score
<ul style="list-style-type: none"> <li>Council fails to identify and plan for enough savings over the medium term.</li> <li>Non-delivery of identified savings</li> <li>New national funding arrangements reduce government funding (Fairer Funding, Business Rates Retention, New Homes Bonus)</li> <li>Economic uncertainty increase volatility on business rates and council tax</li> <li>Risk of inflation on costs and pension deficit increases.</li> <li>Lack of capital resources to fund the council's asset base – implications</li> </ul>	<ul style="list-style-type: none"> <li>Councils financial position goes into deficit, reducing confidence in financial strength and governance</li> <li>Unplanned use of reserves reducing capacity and flexibility and compromising stability.</li> <li>Section 114 notice</li> <li>Government intervention</li> <li>Failure to deliver Council Plan</li> <li>Adverse comments by poorer perception of Council by stakeholders.</li> <li>Overspends arising from activity not in service plans.</li> </ul>	<ul style="list-style-type: none"> <li>Reviewed all the assumptions within the MTFS and updated.</li> <li>Corporate budget planning guidance issued</li> <li>CLT review of budget options and MTFS refresh</li> <li>Cabinet give due consideration to latest forecasts and options to close any gap identified during the review of MTFS assumptions.</li> <li>Consultation will be completed where required for all proposals approved in Feb 2022 budget.</li> <li>Restructure senior management team to improve service delivery and drive forward transformation programme.</li> <li>Started process of service reviews to generate efficiencies</li> <li>Utilising invest to save reserve to deliver transformation programme</li> <li>Refresh cabinet briefing on the MTFS and approve revised MTFS</li> </ul>	Jun 20	5	2	10	Manage	5	3	15
			Risk Control Action							
			Action		Owner		Target Date		Update	
			All budget proposals are monitored on a monthly basis		Executive director of corporate and commercial services		Monthly		Financial reporting continues to CLT on a monthly basis with a dedicated session established at CLT as part of its assurance workplan on a quarterly basis.	
			<b>Comments:</b> The Council is working towards a sustainable budget that does not utilise reserves. Current plans incorporate the use of reserves to bring the general fund reserve back to the risk assessed minimum requirement. Once the detail of the spending review 2021 is available to the council in December 2021, further consideration will be given to how the council can address the medium-term financial challenges as funding for the next three years should be clarified.							




Risk: 2. Commercialisation (investment property, NRL, other commercial income sources)			Owner: Executive director of corporate and commercial services				Category: Finance & Resources		Risk Direction:		
			Target Risk				Current Residual Risk				
Description/Triggers	Impact	Mitigation	Date Raised	Impact	Likelihood	Score	Risk Strategy	Impact	Likelihood	Score	
<ul style="list-style-type: none"><li>Lack of depth of skills and knowledge to manage commercial activities (reliance on several key staff)</li></ul>	<ul style="list-style-type: none"><li>NRL – losses in the company result in additional revenue costs to the General Fund</li><li>Non-delivery of budgeted income levels to support general fund</li><li>Ineffective management of the property portfolio leads to reducing income and poor use of assets</li></ul>	<ul style="list-style-type: none"><li>Asset Management Strategy</li><li>Addressed recommendations from the internal audit review of NRL governance.</li><li>Completed a thorough review of the Council's approach to housing commissioning and structure.</li><li>Independent assurance sought on NRL business plan for 21/22 prior to approval of business cases for development proposed in to.</li><li>NRL Board have commissioned independent advice to aid development of the 2022/23 business plan.</li><li>Shareholder panels for NRL and NCSL are established and have participated in the development of the business plans and will approve the final business plan for onward approval by cabinet.</li></ul>	Jun 20	4	2	8	Manage	4	2	8	
			Risk Control Action								
			Action		Owner	Target Date	Update				
			Following Cabinet approval, new and revised structures will be put in place for the management of all non HRA properties.		Executive director of development and city services	Dec 21	New and revised structures – Recruitment of delivery director completed. Recruitment of rest of team ongoing and should be completed by December				
			Produce a new asset management strategy.		Executive director of development and city services	Feb 22	Production underway. Timetable has slipped due to be complete during the autumn.				
<b>Comments:</b> The council stopped its programme of commercial property acquisitions in March 2020 following changes to the Public Works Loan board lending terms. Emerging guidance in this area will continue to be monitored.											

Risk: 3. Health & safety in the workplace			Owner: Executive director of development and city services				Category: Finance & Resources		Risk Direction:		
			Target Risk					Current Residual Risk			
Description/Triggers	Impact	Mitigation	Date Raised	Impact	Likelihood	Score	Risk Strategy	Impact	Likelihood	Score	
<ul style="list-style-type: none"><li>A health &amp; safety breach occurs in respect of an employee, contractor or member of the public using a City Council owned asset.</li></ul>	<ul style="list-style-type: none"><li>Serious injury or death to the person/people involved in the breach</li><li>Significant cost to the Council</li><li>HSE or other regulator investigation and potentially serious outcomes, e.g., corporate manslaughter</li><li>Reputational Damage</li><li></li></ul>	<ul style="list-style-type: none"><li>Corporate Health &amp; Safety Policy and all Performance standards in place</li><li>H&amp;S training for staff and managers mandatory with updates for managers every 3 years</li><li>Service Area Risk Assessments in place (accepting these need review – see actions)</li><li>Provision of PPE as required to all staff</li><li></li></ul>	May 20	4	2	8	Manage	4	3	12	
			Risk Control Action								
			Action		Owner	Target Date	Update				
			Peer review of CH&S functions to be undertaken <ul style="list-style-type: none"><li>Head of planning and regulatory and EH&amp;PP Manager to write scope and seek tenders</li><li>Review completed</li><li>Improvement plan to be drafted</li><li>Implementation of Improvement plan</li></ul>		Head of Planning and Regulatory services & EH&PPM	March 22 April 22 June 22 To be defined once above completed					
			Review of CH&S Policy and Performance Standards		EH&PPM	April 22					
			Completion of Internal Audit of CH&S (Employees related only)		Internal Audit	March 22					
Comments:											

Risk: 4. Further waves of Covid-19:			Owner: Chief Executive				Category: Customer		Risk Direction:	
Description/Triggers	Impact	Mitigation	Date Raised	Target Risk			Risk Strategy	Current Residual Risk		
				Impact	Likelihood	Score		Impact	Likelihood	Score
<ul style="list-style-type: none"><li>Adverse impacts associated with further restrictions and pressures associated with Covid-19 that will have on the city, council and local services</li></ul>	<ul style="list-style-type: none"><li>Lack of government funding to support local businesses resulting in local business failures</li><li>Economic uncertainty increase volatility on business rates and council tax</li><li>Insufficient government funding to local authorities to support the delivery of additional Covid -19 related activities</li><li>Financial pressure due to down turn in income leading to financial instability</li><li>Increase in unemployment</li><li>Increase in claims for benefits and consequential impact on staff workloads</li><li>Impact of staff absences on essential services including the council</li><li>Longer term health inequality increases for deprived neighbourhoods</li></ul>	<ul style="list-style-type: none"><li>Delivery of business support grants and self isolation support payments</li><li>Ongoing work with the Norwich BID and Norfolk Chambers of Commerce to support local businesses</li><li>TCG has been stood back up as of Dec 21. Health Protection Board, attended by Chief Executive, providing oversight, with relevant NRF cells still operating</li><li>Local Coordinating Group continues to oversee partnership response and internal Covid Facilities Group re-established for internal matters,</li><li>C-19 Support Officer provided in the city to give and advice and support to businesses and the public</li><li>Central Covid team established to provide coordinated oversight of marshalling, testing, vaccinations, contact tracing and self -isolation.</li><li>Reinstatement of some covid business support officers (Dec 21) to ensure mask wearing in relevant shops and SIA contract established to review late night economy use of covid passports</li></ul>	Jun 20	4	3	12	Manage	4	3	12
			Risk Control Action							
			Action		Owner		Target Date	Update		
			Work with the Norwich BID, Norfolk Chambers of Commerce, police and Norfolk County Council to review and implement physical measures and signage in the city centre to support social distancing.		Executive director of development and city services		Completed	New posters, signage and toolkits sent to businesses based on new comms messaging and sector specific guidance changes. This has been updated with all taking part in Local Coordination Groups (LCGs) which meet fortnightly and review all possible actions needed and work together to take action. New posters based on the Dec 21 mask legislation changes are being distributed around the city.		
			Implementation of lessons from scenario planning via Public Health		Executive Director of Community Services		Ongoing	Covid team is now one single team with funding secured until at least Mar 22 with a funding request in with PH for extension until June 22 to mitigate for staff deciding to move on to other jobs.. Escalation route in place for events to LCG for any concerns and Public Health attendance at SAGs if needed. Coordination of additional resource requirements in the event of surge planned and ready for implementation.. LCG continue to monitor good practice regarding outbreak management. Debrief from tabletop scenario complete and learnings used in surge planning.		
Working via Safety Advisory Group to ensure careful scrutiny of public realm events		Executive Director of Community Services		Ongoing	New guidance produced via NRF social distancing cell and escalation routes confirmed. Public Health have an open invitation to invite them to SAGs where needed and all events in scope are discussed at LCGs fortnightly. Nothing upcoming except Love Light Festival in Feb which is being kept under review.					

		<ul style="list-style-type: none"> <li>Continued funding of Financial Inclusion Consortium and successful bids to Community Renewal Fund as mitigation to economic and deprivation risks. Continued work with HIOG (health inequality oversight group) led by CCG to review health equality issues.</li> <li>Close management of COMF budgets and exploration of re-charging opportunities</li> <li>Working with Local Outbreak Management plan colleagues to scenario plan and ensure response is fit for purpose. Reviewed as needed but current wave is being more directed by central NHS teams with limited need to implement Op Eagle planning.</li> <li>Use its licensing powers to support businesses – particularly those in the hospitality sector – where appropriate to vary the use of outside space, whilst ensuring that people with disabilities can move around the city safely</li> </ul>	Communications	Executive Director of Community Services	Ongoing	Communications NRF cell continues with targeted comms and outreach to vulnerable groups. Winter planning in train with Norwich BID and local businesses targeting the night time economy and how to continue to go out over the festive period but safely.
			Continue to deliver grants and wider support to businesses.	Executive director of corporate and commercial services	Ongoing	BAU – new business support grant announced for hospitality sector on 21 December. Awaiting details from government to take forward and open for applications.
			To work effectively with partners through effective networks to minimise spread of virus, provide clarity of local message and for us to provide an effective local track and trace service	Chief Executive	Ongoing	LCG convened fortnightly with key stakeholders including County Council Director of Public Health, East Anglia University. Action plan in place including deployment of Covid officers, more visible communications e.g. regular press conferences, continued review of data to identify hotspots and continued local contact tracing system. Dedicated covid team and management in place within budget and continued shifting of resource as needed depending on current circumstances. Utilising Household Support Fund (HSF) via the covid team to mitigate any financial issues caused by covid and ensure residents aren't leaving isolation to work where possible.
			Working with health colleagues in PH and CCG to review the longer term ambitions to reduce health inequality in deprived neighbourhoods	Executive Director of Community Services	Ongoing	Working with HIOG to ensure partnership working across the city which focused on those most impacted by the pandemic and previous deprivation. Funding secured from vaccine funds, CCG and Norwich Opportunity area to pilot new ways of working in this realm to be evaluated by UEA.
			<b>Comments:</b> While the response is now more embedded and tested with clear plans in place for future waves, the impact is no less than before as the risks themselves are shifting with the changing variants and understanding of the longer-term impacts.			


Risk: 5. Impact of Brexit			Owner: Chief Executive				Category: Customer	Risk Direction:		
				Target Risk				Current Residual Risk		
Description/Triggers	Impact	Mitigation	Date Raised	Impact	Likelihood	Score	Risk Strategy	Impact	Likelihood	Score
<ul style="list-style-type: none"><li>Continued uncertainty over the nature of the UK's exit from European Union.</li><li>Risks associated with potential no deal scenario</li></ul>	<ul style="list-style-type: none"><li>Public disorder events</li><li>Food availability (panic buying/ stockpiling) - Increased prices for food and fuel</li><li>Possible disruption to fuel supplies</li><li>Staffing issues (EU nationals)</li><li>Inclement weather may have increased impacts</li><li>Flood season September – April (impacts on Coastal Districts – provision of mutual aid)</li><li>Staffing resilience managing concurrent events (e.g. Covid, Brexit, severe weather)</li><li>Potential political developments (elections/referendums) – these would place increased pressure on some district councils.</li><li>Increases in environmental crimes i.e. fly tipping etc., as advised by the Environment Agency</li><li>Significant impact in cost of labour and resources</li></ul>	<ul style="list-style-type: none"><li>Membership &amp; participation in Norfolk Resilience Forum (NRF)</li><li>NRF multi-agency plans to deal with significant events</li><li>NRF Brexit Strategy</li><li>Business Continuity Plans</li><li>Brexit Communications Plan</li><li>National guidance/ toolkits</li><li>Strategic Brexit Lead Officer</li></ul>	Apr 20	2	4	8	Manage	3	4	12
			Risk Control Action							
			Action		Owner		Target Date	Update		
			Monitor the situation, awaiting further government guidance		Emergency Planning Manager/ Environmental Health & Protection Manager		Ongoing	EPM engaged with NRF EU transition working group. Continuing to monitor any impacts		
			Information sharing through NRF structures		Emergency Planning Manager		Ongoing	NRF EU Transition strategy reviewed and updated to reflect our current position.		
			Participation in NRF Brexit planning meetings		Emergency Planning Manager		Ongoing	Risk assessment reviewed and updated in the strategy. Government Reasonable Worst Case Scenarios used to inform our activities. Update from 22/4 meeting: quiet in terms of immediate impact; supply chain issues seem to be calming down from a business perspective; deadlines ahead which may present challenges (30/6). Group agreed to stand down, can be reinstated quickly if there is a need to. Issues of concern can be escalated through MAFG. 5/7 – Meetings still on pause, no intel to cause concern at present. Not directly Brexit related, media <a href="#">article</a> has highlighted concerns around food supply chain due to acute shortage of HGV drivers		
			Promotion of EU Settlement Scheme		Emergency Planning Manager		complete	Working with comms and service areas to proactively promote the EU Settlement Scheme. Leaflet included in council tax bills; scripts and posters shared with service areas; leaflets and		

						posters sent to businesses; text burst sent to residents. We will continue to promote. TC – 5/7: EU Settlement Scheme closed on 30 June. The scheme has introduced a criteria set for late applications if there are reasonable grounds for missing the deadline. Cllr Walters sent letter to government asking for the deadline to be extended.
			<p><b>Comments:</b> Impacts from NRF Brexit Strategy</p> <p>Trade deal between the UK and EU finalised late December 2020.</p> <p>Proactive promotion and targeted comms to encourage EU nationals to register for EU Settlement Scheme. If individuals do not register they will become unlawfully resident, in breach of UK immigration laws and could be forcibly removed. They will not be entitled to benefits or support and classed as having No Recourse to Public Funds. Housing to consider if there are implications on housing stock and their service area. This could potentially result in greater numbers of rough sleepers.</p> <p>6/10: Nothing further to report. NRF meetings still on pause, no further intel.</p> <p>6/1/22 NRF meetings still on pause – no intel to cause concern at present. New customs procedures and 'rules of origin' declarations came into force 1/1/22, more complex paperwork to bring goods into Britain, which may cause issues with supply chain of some products.</p>			




		<p>due to Covid or issues with supply change due to Brexit.</p> <ul style="list-style-type: none"><li>• Completion of outstanding actions from previous EP and BC exercises</li><li>• Emergency planning duty officer rota and procedures in place</li><li>• Emergency planning arrangements reviewed and updated</li><li>• Business continuity plans reviewed</li><li>• New emergency planning strategy</li><li>• Gold/Silver rota in place to support EPDO.</li></ul>	
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Risk: 7. Cyber Security			Owner: Executive director of community services				Category: Processes & Systems	Risk Direction:		
				Target Risk				Current Residual Risk		
Description/Triggers	Impact	Mitigation	Date Raised	Impact	Likelihood	Score	Risk Strategy	Impact	Likelihood	Score
<ul style="list-style-type: none"><li>lack of staff awareness and training in relation to cyber security.</li><li>An IT vulnerability allows a Cyber-attack on the corporate data network</li><li>Failure to address the IT recommendations of IT Health assessments in a timely fashion.</li><li>Non-compliance with the Data Integrity Principle (GDPR).</li></ul>	<ul style="list-style-type: none"><li>The Cyber-attack on the local authority in NE England is estimated to have cost £10m.</li><li>Loss of IT systems (such as Web services, Email, Payments, Public Access, Corporate information etc) for several days, weeks or even months)</li><li>IT systems don't meet service transformational expectations.</li><li>Customer services disrupted</li><li>Financial impact of prolonged IT shutdown</li><li>Political &amp; reputational risk</li><li>Non-compliance with Payment Card Industry standards which results in financial fines.</li><li>Non-compliance with Public Sector Network which results in possible loss of DWP information affecting the Benefits' Service.</li></ul>	<ul style="list-style-type: none"><li>Corporate Information Group – monitor information assurance related issues.</li><li>Independent annual Cyber health assessments provides for a friendly warning of vulnerabilities</li><li>Firewalls &amp; Security Products</li><li>Internal audit of cyber security</li><li>Refresh the Staff Awareness Programme</li><li>Attendance at CyberShare East</li><li>Member of Security Information Sharing Partnership (CiSP)</li><li>Member of NCSC Early Warning system (a service designed to inform the organisation of potential cyber attacks)</li></ul>	Jun 20	5	3	15	Manage	5	4	20
			Risk Control Action							
			Action		Owner		Target Date	Update		
			Review the need to insure against cybersecurity attacks.		Head of Customers, IT & Digital		Feb 22	Brokers have been identified that will provide insurance against cyber attacks. They have requested information about our existing security protection levels. Aim to have this returned to brokers by end of February 2022. A new action will follow this.		
			Address the vulnerabilities identified from the IT Health Assessment		Head of Customers, IT & Digital		Feb 22	The council has achieved PSN compliance status.  Further information about planned actions can be obtained from the Head of IT, customers and digital <sup>1</sup>		
			Review of IT Process/Policy Documentation		Head of Customers, IT & Digital		Complete	review is complete.		
			Training session in November 21 to include cyber-attacks and their potential impact		Emergency Planning Manager		Complete	6/1/22: Exercise Mean Arrows delivered to SLT on 22/11/21. The table-top discussion exercise was to evaluate the council's response to a cyber-attack. Exercise report drafted with a number of recommendations, to be presented to CLT		
			Comments:							


<sup>1</sup> Revised wording published 12 April 2022

Risk: 8 Data Protection Compliance			Owner: Executive director of community services				Category: Processes & Systems	Risk Direction:		
				Target Risk				Current Residual Risk		
Description/Triggers	Impact	Mitigation	Date Raised	Impact	Likelihood	Score	Risk Strategy	Impact	Likelihood	Score
<ul style="list-style-type: none"><li>• Technical or procedural non-compliance with UK Data Protection legislation</li><li>• Unauthorised access to, loss or disclosure of personal data</li></ul>	<ul style="list-style-type: none"><li>• Regulatory / Financial penalties. The Information Commissioner’s Office (ICO) can impose fines of up to £17.5 million or 4% of the total annual worldwide turnover in the preceding financial year, whichever is higher.</li><li>• Legal action. Data subjects can bring compensation claims based on material or non-material damage including distress for non-compliance.</li><li>• Political &amp; reputational damage.</li></ul>	<ul style="list-style-type: none"><li>• Mandatory e-learning modules on Data Protection.</li><li>• Corporate Information Group – monitor information assurance related issues.</li></ul>	Jun 20	4	2	8	Manage	4	3	12
			Risk Control Action							
			Action		Owner		Target Date	Update		
			Review all IT systems to ensure they meet technical data protection requirements		Head of Customers, IT & Digital		Complete	IT roadmap now in place to refresh and replace systems as appropriate. New systems are scrutinised as part of the DPIA process.		
			Deliver staff awareness. Links to Cyber Security Risk actions.		Head of Customers, IT & Digital		Complete	Member Development Training delivered on 06/12/2021 to highlight their roles and responsibilities. Mandatory training for all staff and contactors launched 4 <sup>th</sup> October 2021.		
			Review Data Protection / Information Assurance Policies		Head of Customers, IT & Digital		Mar 2022	The ‘Appropriate Policy Document’ is published on Norwich.gov but further work required to identify areas where NCC processes criminal data as a ‘Competent Authority’. The IT User Security Policy is being redrafted after feedback from JCNC. This is scheduled for reconsideration at the next meeting on 19 Jan 2022. The Records Management Policy has been approved by JNCN. The User Security and RM Policies will be launched together in Feb 2022. All policies will be reviewed on an annual or bi-annual basis once published.		
			Review Data Protection / Information Assurance Processes and Documentation		Head of Customers, IT & Digital		Jun 22	The Information Security Incident procedure remains under review and is scheduled to be approved at Corporate Information Assurance Group on 21 Jan 2022. .		


						<p>It is recognised that the Retention Schedule requires a significant review to appropriately reflect our current processing activities. This is scheduled to commence in Q1 2022.</p> <p>It is recognised that the Records of Processing Activity register requires a review to better reflect our current processes. This is scheduled to commence in Q2 2022. Whilst a legal requirement this offers little useful application or risk assurance.</p>
			<b>Comments:</b>			


Risk: 9. Failure to fulfil statutory or legislative responsibilities - safeguarding.			Owner: Executive director of community services				Category: Customer		Risk Direction: 	
Description/Triggers	Impact	Mitigation	Target Risk				Current Residual Risk			
			Date Raised	Impact	Likelihood	Score	Risk Strategy	Impact	Likelihood	Score
<ul style="list-style-type: none"> <li>• Lack of understanding the statutory and legislative responsibilities.</li> <li>• Lack of awareness of legislative changes and new legislation.</li> <li>• Failure to implement statutory duties and responsibilities.</li> <li>• Lack of required skills knowledge and experience of key officers tasked to fulfil statutory or legislative responsibilities.</li> <li>• Insufficient organisational capacity.</li> <li>• Ineffective procedures and processes.</li> <li>• Lack of clarity of roles and ownership of legislative responsibilities (H&amp;S, safeguarding, equality etc.).</li> <li>• Delegation of responsibilities where services are with a contractor.</li> </ul>	<ul style="list-style-type: none"> <li>• Financial costs in compensation &amp; fines</li> <li>• Intervention if complete failure</li> <li>• Acting illegally</li> <li>• Negative impact on the Council's reputation</li> <li>• Wrong decision being made</li> <li>• Harm, abuse, accident or death linked to failure of the Council to act within safeguarding arrangements</li> <li>• Being held to account by overseeing organisations (e.g. children safeguarding) maybe included in reputation</li> </ul>	<ul style="list-style-type: none"> <li>• Communication Strategy to ensure implementation</li> <li>• Corporate Governance Group in place to oversee compliance</li> <li>• Legal Services in place to provide support</li> <li>• Positive approach to checking compliance with legislation</li> <li>• Professional leads identify legal requirements</li> <li>• Quality assurance processes in place for contracted services</li> <li>• Suitably trained and qualified staff and mandatory reading of key documents for all officers</li> </ul>	Apr 20	4	3	12	Manage	5	3	15
			Risk Control Action							
			Action		Owner		Target Date		Update	
			Review risks, impact, mitigations, ownership and actions		Housing Operations Director		Mar 22		Interim Head of Service appointed to undertake review.	
			Increase officer confidence in information sharing and understanding of when and how to do so appropriately		Early Intervention & Community Safety Manager		on-going		The Training audit is on-going as staff are recruited to key roles and inducted into the organisation.  A targeted programme of safeguarding training is planned. To be updated following review	
			Safeguarding policy and risk embedded into contractors' and sub contractors' policy and practice		Early Intervention & Community Safety Manager		on-going		Safeguarding champions from NPS attend meetings to create the link into their organisation and the contractors that we work with. To be updated following review	
			Maintain safeguarding champion knowledge, understanding, confidence		Early Intervention & Community Safety Manager		on-going		Safeguarding champions meet every two months and assess their knowledge requirements. To be updated following review	
			Embed learning across council teams		Early Intervention & Community Safety Manager		Ongoing		There are regular learning sessions for Neighbourhoods staff. Learning from Complex Case Strategy Meetings and Safeguarding Adult Reviews is shared at bi-monthly champions meetings for wider organisational dissemination.	
Comments: Populated from 2019-20 section 11 self-assessment action plan										

**Risk 10 – Removed due to commercial confidentiality.**


Risk: 11. Antisocial behaviour			Owner: Executive director of community services				Category:		Risk Direction:	
				Target Risk				Current Risk		
Description/Triggers	Impact	Mitigation	Date Raised	Impact	Likelihood	Score	Risk Strategy	Impact	Likelihood	Score
<ul style="list-style-type: none"><li>• Failure to adequately manage risk to residents affected by antisocial behaviour</li></ul>	<ul style="list-style-type: none"><li>• Death or serious injury to resident</li><li>• Mental well-of resident being impacted</li><li>• Escalation of issues leading to increased service demand and/or cost</li></ul>	<ul style="list-style-type: none"><li>• Ensure risk assessment process being followed throughout the antisocial behaviour process</li><li>• New ASB team fully staffed</li></ul>	Oct 20	2	3	6	Manage	4	4	16
			Risk Control Action							
			Action		Owner		Target Date	Update		
			Successful recruitment to new team so it is fully staffed		Early Intervention & Community Safety Manager		Mar 22	Temporary staff recruited. Recruitment for front-line staff underway		
			New ASB team trained on and conversant with ASB risk assessment procedures		Early Intervention & Community Safety Manager		Jun 22	Temporary trained on corporate and national service standards. Awaiting recruitment of new team		
			Residents know how to report ASB to the council		Early Intervention & Community Safety Manager		Complete	Complete. Online and telephone reporting in place.		
			Review of new ASB response arrangements to ensure effective		Early Intervention & Community Safety Manager		Complete	New process and standards agreed in addition to targets set to improve performance. Customer touch points increased 6 times in first six weeks. This includes a minimum of 1 in-person visit to the victim.		
<b>Comments:</b> CLT 24/2 agreed to add to corporate register As part of new structure ASB has moved to housing and community Safety Service within community services directorate. Full review of ASB service underway.										





Risk 13: The Council’s approach to waste and recycling becomes financially, environmentally and contractually unsustainable			Owner: Executive Director Development & City Services				Category:	Risk Direction:		
				Target Risk				Current Residual Risk		
Description/Triggers	Impact	Mitigation	Date Raised	Impact	Likelihood	Score	Risk Strategy	Impact	Likelihood	Score
<ul style="list-style-type: none"><li>• The Council's Waste Management services operate in a highly regulated environment. This regime covers the type of collection services that must be provided to households and businesses, and how material can be processed. There are a number of policy and contractual challenges that the Council must address between now and 2024, including the review of the collection contract with Biffa, our recycling processing with NEWS, and our response to the proposals in the proposed Environment Bill</li></ul>	<ul style="list-style-type: none"><li>• Risk to service delivery as a result of appropriate contracts not being in place</li><li>• Service becomes financially unsustainable</li><li>• Services provided do not comply with new regulatory regime</li><li>• Council cannot deliver the objectives of the Environment Strategy as they relate to waste minimisation and recycling</li><li>• Significant reputational impact on the Council</li></ul>	<ul style="list-style-type: none"><li>• Comprehensive review of financial and contract strategies to identify and address potential barriers to new contracts being agreed with suppliers is about to commence with Biffa and Peopletoo</li><li>• Peopletoo evaluation will scope review and redesign of services to ensure that they meet current and future regulatory requirements</li><li>• Staff development programme focussing on procurement, waste strategy and contract management to be designed and delivered</li><li>• New “variable gate fee” contract with NEWS agreed at November Cabinet to address financial sustainability concerns of previous contract</li><li>• New Environment Act 2021 does not provide specific dates for implementation of Consistency and Extended Producer Responsibility requirements</li><li>• Council already provides range of services specified within the Act, although it is unclear on whether Garden Waste should be provided free of charge</li></ul>	May 2021	2	2	4	Manage	4	3	12
			Risk Control Action							
			Action		Owner		Target Date		Update	
			Contract strategy for Biffa to be developed and agreed by CLT		Head of Environment Services		Mar 22		HoES attended CLT in July and resources agreed to allow resources to be released to enable actions identified below to be delivered.	
			Contract strategy for NEWS to be developed and agreed by CLT		Head of Environment Services		Complete		Anticipated that report will be taken to Cabinet in Nov to agree way forward Complete	
			Waste Strategy to be reviewed to address financial, regulatory and climate challenges		Head of Environment Services		Mar 22			
Comments:										

Risk 14: Health, Safety and Compliance in council homes and buildings			Owner: Executive Director of Community Services					Risk Direction:		
				Target Risk				Current Residual Risk		
Description/Triggers	Impact	Mitigation	Date Raised	Impact	Likelihood	Score	Risk Strategy	Impact	Likelihood	Score
<ul style="list-style-type: none"><li>• The council fails to meet its statutory, legislative, and regulatory requirements in relation to Health, Safety and Compliance</li><li>• The council fails to return its homes and buildings to full compliance within an acceptable period and as expected by the Regulator of Social Housing</li></ul>	<ul style="list-style-type: none"><li>• Risk of serious detriment to tenants and leaseholders</li><li>• Regulator of Social Housing takes enforcement action against the council</li><li>• Planned programmes of work to council homes are delayed to ensure H &amp; S and compliance work is prioritised</li><li>• Cost increase in relation to contract works, insurance and management of homes</li><li>• Emergence of further Health, Safety and Compliance matters as data is validated and through transfer of JV.</li></ul>	<ul style="list-style-type: none"><li>• Capacity, skills and expertise to be recruited within NCC</li><li>• Insourcing of JV (NPSN) including health, safety and compliance function</li><li>• Compliance data validation for transfer to NEC</li><li>• Compliance Improvement Plan (CIP) to be developed to include a suite of supporting plans</li><li>• Remedial works trackers across all areas</li><li>• Housing Health Safety and Compliance Board</li><li>• Monthly reporting to RSH</li><li>• Quarterly reporting to Cabinet</li><li>• Sufficient capital and revenue budget provision</li><li>• Increased contractor capacity to deliver CIP</li></ul>	October 2021	4	2	8	Manage	5	4	20
			Risk Control Action							
			Action		Owner	Target Date	Update			
			CIP and suite of documents including: <ul style="list-style-type: none"><li>• Recovery Plan (what we are doing to support/achieve recovery to 100% compliance)</li><li>• Dashboard (the data that shows progress)</li><li>• Building Safety Bill Act requirements</li><li>• Risk assessment plus impact and mitigations</li></ul>		Housing Operations Director	Dec 21	Completed – ongoing as 'live documents'			
			Recruitment to be completed		Exec director of community services	Dec 21	Completed. Additional resource requirement identified to support other council buildings.			
			Budget provision to be recommended for approval November Council		Exec director of community services	Nov 21	Approved and budget provision in place for 2022/23			
			Remedial Works Trackers		Housing Operations Director	Dec 21	Completed – ongoing as 'live documents'.			
			Contractor Capacity		Housing Operations Director	Ongoing to Dec 22	In progress – procurement of additional capacity underway – to be in place by 01/04/2022			
			Data validation in preparation for transfer to NEC		Housing Operations Director	March 22	In progress in line with target date.			
			<b>Comments:</b> The Regulator of Social Housing has found NCC in breach of the Home Standard. The RSH served NCC with a Regulatory Notice on the 27 <sup>th</sup> of October 2021 setting out details of the breach.							



Risk 15: Failure to be able to draw down £15m of HIF money previously secured from Homes England and under contract to assist with the delivery of Anglia Square leading to failure for successful redevelopment of this key city centre site.			Owner: Executive Director Development & City Services					Risk Direction:		
				Target Risk				Current Residual Risk		
Description/Triggers	Impact	Mitigation	Date Raised	Impact	Likelihood	Score	Risk Strategy	Impact	Likelihood	Score
<ul style="list-style-type: none"><li>Failure to be able to draw down £15m of funding previously secured from Homes England in order to assist delivery of Anglia Square redevelopment</li><li>HIF funding needs to be spent by March 2024 at latest. Current HE advice is this means not only being drawn down by the Council from HE but also being able to evidence delivery of eligible infrastructure before payments are drawn down</li><li>Following refusal of previous planning application for the site timetable is challenging insofar as a revised application is due to be submitted in March 2022. Earliest possible planning decision issued likely to be autumn 2022. Start on site prior to 2023 unlikely</li></ul>	<ul style="list-style-type: none"><li>Threat to the redevelopment of Anglia Square – continued blight on northern City Centre</li><li>New housing and commercial development not delivered – needs remain unmet</li><li>Loss of future Council tax and business rates income to Council</li><li>Reputational risk to council through failure to draw down allocated funding</li></ul>	<ul style="list-style-type: none"><li>Regular liaison with Weston Homes and Colombia Threadneedle to ensure that consultation and processing of application is handled promptly</li><li>Regular engagement with Historic England to minimise prospects of objections/request for call-in of application</li><li>Engagement with Homes England to understand parameters around HIF funding</li><li>Briefing of PAC and Cabinet on emerging proposals (programmed for January and March 2022)</li><li>Requested Homes England reconsider deadline for HIF spend (Director letter sent – awaiting response)</li></ul>	2/11/21	4	2	8		4	4	16
			Risk Control Action							
			Action		Owner		Target Date	Update		
			Commission detailed advice on state aid rules post Brexit and definition of eligible infrastructure for HIF funding		Executive Director Development & City Services		Mar 22	Meeting scheduled with HIF staff to explore additional capacity funding. Meeting with legal advisors planned for 11/01/22 to commission advice. Capacity Funding secured from HE.		
			Commissioning independent viability assessment and programme review. Funded through Homes England capacity Fund (secured £40k)		HofP&RS		Mar 22	Brief for tender written and with procurement for issue through Bloom framework.		
			HofP&RS meeting Outpost artists to consider relocation options		HofP&RS		Feb 22	Meeting arranged for 03.02.22		
			Community Review Panel		HofP&RS					
			Design review panel		HofP&RS					
			<b>Comments:</b> Response from Homes England on possible extension of time on HIF mvf deadline still awaited.							

Risk 16: Elections			Owner: Executive director of corporate and commercial services				Category: Processes & Systems		Risk Direction:		
				Target Risk				Current Residual Risk			
Description/Triggers	Impact	Mitigation	Date Raised	Impact	Likelihood	Score	Risk Strategy	Impact	Likelihood	Score	
<ul style="list-style-type: none"><li>• Delivery of a successful and compliant election on a new election system and through the ongoing uncertainty of the covid-19 situation</li></ul>	<ul style="list-style-type: none"><li>• Issues in deployment of the election system could present challenges in managing the electoral register and elections effectively</li><li>• The Covid-19 pandemic uncertainty could create additional burdens in the general management of the election and impact on voter behaviour (increases in postal and proxy voting)</li></ul>	<ul style="list-style-type: none"><li>• Delivery of the deployment programme for the election system with back-up plan in the event of unsuccessful implementation</li><li>• Election activities continue to be risk assessed in light of the ongoing pandemic</li></ul>	Aug 20	3	2	6	Manage	3	3	9	
			Risk Control Action								
			Action		Owner		Target Date	Update			
			Delivery of election system deployment programme		Application support manager / Democratic and elections manager		Feb 22	A project team is in place with an agreed deployment plan with our chosen provider, Democracy Counts. The deployment plan includes user testing and training. To mitigate any risks of unsuccessful deployment, the IDOX system currently used has been extended to cover the election period if it needs to be called upon.			
			Monitor covid-19 restrictions and evaluate impact on conduct of the elections		Chief Executive / Democratic and elections manager		May 22	A regular programme of elections team meetings has been scheduled. This has been identified as a key risk to election delivery and will continue to be monitored. A full project plan for the election is in development.			
<b>Comments:</b> This risk escalates to a corporate level for Q3 and Q4 of 2021-22. The risk will de-escalate at the end of Q1 and in Q2 to the directorate risk register.											

Risk: 17 Failure to deliver acceptable levels of performance in regulatory services			Owner: Executive Director Development & City Services				Category:		Risk Direction:		
			Target Risk				Current Residual Risk				
Description/Triggers	Impact	Mitigation	Date Raised	Impact	Likelihood	Score	Risk Strategy	Impact	Likelihood	Score	
<ul style="list-style-type: none"><li>• Large backlogs of applications needing to be addressed</li><li>• Failure to avert avoidable harm to public</li><li>• Increased challenge/complaint re decisions made</li><li>• Failure to comply with Private Hire vehicle compliance standards</li></ul>	<ul style="list-style-type: none"><li>• Reputational harm, restricted ability to charge</li><li>• Reputational harm, potential legal risks</li><li>• Failure to maximise income</li></ul>	Peer Review completed and areas for priority attention identified, resulting in programme of service improvements alongside temporary resource to address backlogs	26/01/2022	4	2	8		4	4	16	
			Risk Control Action								
			Action		Owner		Target Date	Update			
			Regulatory services improvement plan to be drafted, to include full business case for digitalisation of services, process review, and policy amends		Sarah Ashurst		Aug 22	Full improvement plan to be costed and presented to CLT for budget sign off through Opening Briefs process and approval of timescales. Once agreed, PID and Improvement plan will form actions to be completed here.			
			<b>Comments:</b> Peer review outcomes and restructure proposals taken through CLT and Portfolio holders briefed. Restructure consultation and temporary resources will be consulted on and implemented in the New year. Improvement plan for Peer review services and wider dept to be drawn together in New Year (see action 2 above).								

Risk scoring matrix

Impact	Very High	5	5	10	15	20	25
	High	4	4	8	12	16	20
	Medium	3	3	6	9	12	15
	Low	2	2	4	6	8	10
	Negligible	1	1	2	3	4	5
			1	2	3	4	5
			Very rare	Unlikely	Possible	Likely	Very Likely
			Likelihood				

Risk direction key

