

Committee name: Audit

Committee date: 19/03/2024

Report title: 2023/24 Quarter 3 Corporate Risk Register

Portfolio: Councillor Kendrick, cabinet member for resources

Report from: Interim Chief Finance Officer

Wards: All wards

OPEN PUBLIC ITEM

Purpose

This report provides an update to the council's corporate risk register based on the position for quarter three (December 2023)

Recommendation:

It is recommended that the Audit Committee notes the identified risks and the direction of travel.

Policy framework

The council has five corporate priorities, which are:

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

This report meets the Norwich City Council is in good shape to serve the city corporate aim.

Introduction and background

- 1. Heads of Service and other risk owners were asked to update their directorate and corporate registers to reflect the position at the end of quarter three (December 2023) Directorate level risks continue to be reviewed by the relevant management team and are escalated to the Corporate Risk Register, for consideration by the Executive Leadership Team (ELT) where the residual risk exposure supports that action.
- 2. The Corporate Risk Register is shown at Appendix A with a report included on the exempt agenda detailing a further three risks. The position at the end of quarter 2 (up to 30 September) was reported to Cabinet in November. The quarter 3 position was reported to Cabinet at their meeting on 7 February 2024.
- 3. Significantly the risk associated with health and safety compliance in council homes and buildings has been removed from the Corporate Risk Register, moving to be managed at a Directorate level, following the formal notification from the Social Housing Regulator that they were satisfied with the progress made in addressing the issues which led to the council self-referring itself for breaches.
- 4. The environment in which the council operates remains relatively high risk as the financial environment is challenging both in terms of the economic and the funding position. In quarter 3 the council considered the provisional finance settlement provided in December and progressed its main budget and council tax setting reports for full council approval in February. The council was able to approve a balanced budget for 2024/25 without recourse to the use of reserves, reflecting the work done previously to identify future savings and with a high level of saving delivery in 2023/24 (93%).
- 5. Inflation has recently fallen from double digit levels but still remains significantly above the government's long term target rate placing demands on the council, its partners and residents. The absence of any spending review totals beyond the budget for 2024/25 makes longer term financial planning all but impossible. Further uncertainties also are apparent in relation to the timing and outcome of the general election.
- 6. Previous reports have highlighted the situation over nutrient neutrality. It was initially understood that the government would be seeking to amend the Levelling Up and Regeneration Bill to resolve the nutrient neutrality challenge. This amendment was defeated, and so was not included in the final Levelling Up and Regeneration Act. The risk related to nutrient neutrality therefore remains unchanged at this stage, although the council continues to consider the development of the Norfolk joint venture company.
- 7. Additional funding has been provided to Broadland District Council as lead authority for the Nutrient Mitigation Fund (NMF) following their bid for expression of interest, which was submitted in May 2023. The NMF seeks to help address nutrient neutrality across all the affected Norfolk local planning authorities and the council is engaged with the lead authority about establishing processes for the fund to be accessed by providers with appropriate governance and financial requirements met.
- 8. The relevant service leads have identified that progress is being made with corporate risks 3 and 6 and they are confident that there will be movement on

the risk scoring in the next quarter. The council continues to keep a watching brief on all key risk areas. In that same vein, the Council is also in the process of updating its approach to risk management to ensure that risks are properly managed and that there is adequate guidance. Initial work is being undertaken with the council's insurance and risk advisors (Gallagher).

9. Since the Quarter 3 report was finalised and considered by Cabinet further developments have taken place in relation to Anglia Square and in particular CORP 15 the risk that the HIF resource from Homes England might be lost if the scheme did not proceed as planned. This risk has materialised into an issue with the developer publicly withdrawing from the scheme. The audit committee should note that this risk will therefore be removed from the next risk report but remains here as it was a relevant Q3 risk.

Consultation

10. There has been no specific consultation on these proposals.

Implications

Financial and resources

- 11. 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 and budget.
- 12. There are no proposals in this report that would reduce or increase resources.

Legal

13. Identification and consideration of its corporate risks is an important governance function to ensure that appropriate action is being taken to ensure the Council takes lawful decisions and mitigates exposure to risk. The audit committee exercises oversight and collectively this is designed to ensure that the council understands and is in a position to respond to risks as they arise.

Statutory considerations

Consideration	Details of any implications and proposed measures to address:
Equality and Diversity	N/A
Health, Social and Economic	N/A
Impact	
Crime and Disorder	N/A
Children and Adults Safeguarding	N/A
Environmental Impact	N/A

Risk management

Risk	Consequence	Controls required
The council is exposed to risks which need to be identified recorded and managed appropriately	Not managing risks appropriately exposes the council to a range of potential negative outcomes ranging from financial loss to impacts on its reputation.	The risk register provides a focus to consider risk management and in particular mitigations. Other broader mitigations such as insurances also support the council's management of risk.

Other options considered

14. As the report is primarily for information no other options have been included.

Reasons for the decision/recommendation

15. It is important for the committee to understand the risks that the council is exposed to and the mitigations in place to minimise those risks to acceptable levels.

Background papers: None

Appendices:

Appendix A Summary risk register Appendix B Risk mitigations

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Appendix A

	Q2 20	023/24 Q3 202		2023/24		
Risk (inc reference)	Residual risk score	Target risk score	Residual risk score	Target risk score	Current direction	Last Review Date
CORP01 Council Funding Medium - Long Term	12	8	12	8	Static	25/01/2024
CORP03 Health & safety in the workplace	12	8	12	8	Static	09/01/2024
CORP06 Failure to respond to a critical, business continuity or emergency planning event	12	6	12	6	Static	09/01/2024
CORP07 Cyber security	15	15	15	15	Static	08/11/2023
CORP09 Failure to fulfil statutory or legislative responsibilities - safeguarding	15	12	15	12	Static	20/01/2024
CORP12 Contract management - governance	9	4	6	4	Improving	08/01/2024
CORP15 Failure to draw down £15m of Housing Infrastructure Fund (HIF) money previously secured from Homes England (HE) to assist with the delivery of Anglia Square.	12	8	12	8	Static	09/01/2024
CORP17 Failure to deliver acceptable levels of performance in regulatory services	12	8	12	8	Static	09/01/2024
CORP18 Failure to address Natural England advice on Nutrient Neutrality (NN)	15	10	15	10	Static	09/01/2024
CORP20 Cost of living (COL) crisis has a negative impact on the city and the council	16	12	16	12	Static	13/12/2023
CORP21 Climate Change risk to Council and its residents	16	12	16	12	Static	22/01/2024
CORP23 Impact of economic downturn on key council suppliers	12	8	12	8	Static	01/01/2024
CORP24 Temporary and Supported Accommodation - Reducing the Housing Benefit Subsidy gap	15	12	15	12	Static	12/01/2024

Appendix B

REF CORP01

Council Funding Medium - Long Term



Current risk description

Continued reductions in the Council's sources of funding over the medium term

Date raised	01/06/2020
Last review date	25/01/2024

Residual Risk									
	Impact Likelihood Score								
Q4	4	3	12						
Q1 Q2	4	3	12						
Q2	4	3	12						
Q3	4	3	12						
Q4			0						

Target Risk					
Impact	Likelihood	Score			
4	2	8			
4	2	8			
4	2	8			
4	2	8			
		0			

Primary (Corporate	Priority

5 - Norwich City Council is in good shape to serve the city

Risk owner			
Exec Dir - Corporate & Commercial Services			
Service area			
Finance, Audit & Risk			

Current risk direction		
Static		

Progress	Publication Exempt?
ON TRACK	N

Background to this risk

Following a period of austerity in excess of a decade, economic conditions are now increasing demand and costs and the level of governemnt funding is uncertain

Triggers

Council fails to identify and plan for enough savings over the medium term

Non-delivery of identified savings

New national funding arrangements reduce government funding (Fairer Funding, Business Rates Retention, New Homes Bonus)

Economic uncertainty increase volatility on business rates and council tax

Risk of inflation on costs and pension deficit increases

Lack of capital resources to fund the council's asset base

National finances deteriorate adding to saving pressures to be met from government departments including for Local Government

Main impacts

Council's financial position goes into deficit, reducing confidence in financial strength and governance

Unplanned use of reserves reducing capacity and flexibility and compromising stability

Section 114 notice

Non-compliance with Payment Card Industry (PCI) standards which results in financial fines

Failure to deliver Council Plan

Adverse comments by poorer perception of Council by stakeholders

Overspends arising from activity not in service plans

Council Funding Medium - Long Term



Control / mitigation (action required)	Control update frequency	Control status (RAG)	Date of next update	Update on progress of control / mitigation	Contol / Mitigation Owner
Financial performance and all budget proposals are monitored on a monthly basis; management action agreed by CLT in response to projected position	MONTHLY	G	Feb-24	Budget monitoring position reviewed by CLT with management action implemented to address variances	Exec Dir - Corporate & Commercial Services
Future Shape Norwich established as transformation vehicle for longer term budget proposals with initial reporting to Cabinet on high value projects	QUARTERLY	G	Complete	Programme of work agreed and being taken forward suppoted by Design Authority Actions complete	Exec Dir - Community Services
SLT budget sessions scheduled for June 2022 to identify additional proposals for savings	MONTHLY	G	Complete	Budget sessions held and information provided to inform 2023/24 budget setting and MTFS processes. Actions complete	Chief Executive
A cabinet report will be prepared identifying the impact of higher inflationary pressures to the Council's budget		G	Complete	Report prepared and considered in July 2022 as part of budget development. Action complete	Exec Dir - Corporate & Commercial Services
A wide-ranging asset review taking into account operational need, investment properties and disposals has commenced. Changes to the treasury, borrowing and Minimum Revenue Provision regulations will need to be considered				JLL commissioned to support this area of work. Report with recommendations received. Implementation phase to commence Feb 2024.	HoS - Property & Economic Development
Recruitment panel implemented to review all requests for new posts and extensions	MONTHLY	G		Panel met fortnightly. Panel ceased January 2023. Action closed by CEO	HoS - HR & Organisational Development
Identification of proposals to close any budget gaps	ANNUALLY	G	Complete	Saving proposals and/ or additional income proposals have been identified and agreed for consultation that, if all agreed and implemented will enable a balanced budget to be set for 2023/24 and the MTFS period to 2027. Budget agreed by Full council Feb. 2023. Action closed	HoS - Finance, Audit & Risk
Analysis of provisional/ Final LGFS and Autumn budget papers	ANNUALLY	G		Balanced budget and MTFS agreed in Feb. 2023. Significant uncertainty exists from April 2024. Action Closed	HoS - Finance, Audit & Risk

Council Funding Medium - Long Term



Control / mitigation (action required)	Control update frequency	Control status (RAG)	Date of next update	Update on progress of control / mitigation	Contol / Mitigation Owner
Analysis of provisional/ Final LGFS and Autumn budget papers	ANNUALLY	G	May-24	Balanced budget proposed for Feb. 2024. Significant uncertainty exists from April 2024 as it coincides with a possible general election. No extant spending review figures in place after 2024/25. 2024/25 budget proposals indicate balanced postion	HoS - Finance, Audit & Risk

Health & safety in the workplace



Current risk description

Poor H&S management leads to risks to our employees, general public, buildings and spaces.

Date raised	01/05/2020
Last review date	09/01/2024

	Residual Risk				
	Impact	Likelihood	Score		
Q4	4	3	12		
Q1 Q2	4	3	12		
Q2	4	3	12		
Q3	4	3	12		
Q4			0		

Target Risk				
Impact	Score			
4	2	8		
4	2	8		
4	2	8		
4	2	8		
		0		

Primary Corporate Priority				
5 - Norwich (City Council is in	good shane to see		

Risk owner
Exec Dir - Development & City Services
Service area
Multiple Service Areas

Current risk direction		
Static	\$	

Progress	Publication Exempt?
ON TRACK	N

Background to this risk

The Council has a statutory to protect the H+S of its employees and the public in the discharge of its function. Poor H+S practice poses a considerable reputation and financial risk and can also ncrease risks to the staff and public (note risks in relation to Council buildings are covered separately in the risk registered)

Triggers	
A health & safety breach occurs in respect of an employee, contractor or member of the public using a City Council owned asset	

∕lain impacts	
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Serious injury or death to the person/people involved in the breach

Significant cost to the Council

HSE or other regulator investigation and potentially serious outcomes, e.g. corporate manslaughter

Non-compliance with Payment Card Industry (PCI) standards which results in financial fines

Health & safety in the workplace



Control / mitigation (action required)	Control update frequency	Control status (RAG)	Date of next update	Update on progress of control / mitigation	Contol / Mitigation Owner
Implementation of H&S Compliance Check Recommendations	QUARTERLY	G	Apr-24	1 0 0	Environmental Health & Public Protection Manager

Failure to respond to a critical, business continuity or emergency planning event



Current risk description

Ability for services to get back up and running in the event of an emergency situation

Date raised	01/04/2020
Last review date	09/01/2024

Residual Risk				
	Impact	Likelihood	Score	
Q4	4	3	12	
Q1	4	3	12	
Q1 Q2	4	3	12	
Q3	4	3	12	
Q4			0	

Target Risk				
Impact	Likelihood	Score		
2	3	6		
2	3	6		
2	3	6		
2	3	6		
		0		

Main impacts

Primary Corporate Priority

Risk owner
Chief Executive
Service area
Planning & Regulatory Services

Current risk direction		
Static		

Progress	Publication Exempt?
SLIPPED	N

Background to this risk

Norwich City Council is a member of Norfolk Resilience Forum and has a statutory to respond in the evnt of civil emergency

Triggers

Occurrence of a significant event:

- Loss City Hall - Denial of access to City Hall

ICT failure temporary - Cyber attack

Contractor collapse - Supply chain failure

Severe weather events - Loss of power

Sea level rise - Fuel shortages

Communications failure - Pandemic

Insufficient staff representation across strategic, tactical and operational levels to ensure resilience, effective response and enable full engagement within Norfolk Resiliance Forum (NRF) structures

Loss of service delivery across the Council		





Control / mitigation (action required)	Control update frequency	Control status (RAG)	Non- compliance with Payment		Contol / Mitigation Owner
Review of all Emergency planning documentation and Business Continuity Planning to be undertaken by new Emergency Planning manager and action plan for improvement drawn up.	QUARTERLY	G	Amu 24	1	HoS - Planning & Regulatory Services

Cyber security



Current risk description

Cyber risk is the likelihood of suffering negative disruptions to sensitive data, finances, or council operations. Common cyber risks are ransomware, phishing, malware, data leak, insider threat, supply chain and nation state cyber attack and all are associated with

Date raised	01/06/2020
Last review date	08/11/2023

Residual Risk				
	Impact	Likelihood	Score	
Q4	5	3	15	
Q1	5	3	15	
Q2	5	3	15	
Q3	5	3	15	
Q4			0	

Target Risk				
Impact	Likelihood	Score		
5	3	15		
5	3	15		
5	3	15		
5	3	15		
		0		

Primary Corporate Priority	Risk owner
5 - Norwich City Council is in good shape to serve the	Exec Dir - Community Services
city	Service area
	Customers, IT & Digital

Current risk direction		
Static	\$	

Progress	Publication Exempt?
ON TRACK	N

Background to this risk

With the rise in cyber attacks on the public sector and the substantial fallout from successful attacks (loss of services for months, ICO penalties, reputational damage, loss of residents information) this risk has been raised to become visible on the corporate register

Triggers

Email containing ransomware

A website delivers malware or redirects to an infected website

A weakness (vulnerability) in the IT environment is exploited by an attacker e.g. user credentials have been obtained, remote access to the network, malicious software installed, unpatched software in operation, misconfigured IT assets

The supply chain service connecting to the council is poorly managed/configured and becomes the weak spot allowing the attack

A disgruntled employee

Lack of staff awareness and training in relation to cyber security

Physical access gained to the network switches, devices (USB / bluetooth)

Failure to address the recommendations of IT Health assessments in a timely fashion

Procurement of a hosted solution that doesn't protect the council's information or systems or introduces vulnerabilities.

Main impacts

The cyber attack on a local authority in NE of England is estimated to have cost £10m

Customer services severly disrupted

Loss of IT systems (such as web services, email, payments, public access, corporate information etc) for several days, weeks, months or for ever

Non-compliance with Payment Card Industry (PCI) standards which results in financial fines

Political & reputational risk

ICO fines

Financial impact of prolonged IT shutdown

Non-compliance with Public Sector Network (PSN) which results in possible loss of DWP information affecting the Benefits Service

May lead to loss of data, corruption of data, loss of service, ICO fines, reputational risk

Cyber security



Control / mitigation (action required)	Control update frequency	Control status (RAG)	Date of next update	Update on progress of control / mitigation	Contol / Mitigation Owner
Review the need to insure against cyber security attacks	QUARTERLY	G	Complete	To engage with Cyber Assist for a risk review of the Council's IT/Cyber integrity and preparation of a report that provides the Council with a baseline and recommendations for improvements to its cyber security. Once the report has been completed the brokers will then, subject to the output of the review being positive, prepare a marketing prospectus to enable the cyber risk to be marketed and insurance terms to be obtained. Action complete - Insuracne tender completed	
Address the vulnerabilities identified from the IT Health Assessment	QUARTERLY	Α	N/A	On-going activity	HoS - Customers, IT & Digital
Monitor the security products to ensure they are fit for purpose	ANNUALLY	G	N/A	On-going activity	HoS - Customers, IT & Digital
Technical solutions have been deployed. Firewalls, Web Application	ANNUALLY	G		On-going activity	HoS - Customers, IT & Digital
Independent assessment of IT environment	ANNUALLY	G	Complete	As part of the PSN assessment a third party will perform an IT Health Check. Remedial activities will take place to address weaknesses. Actions Complete	HoS - Customers, IT & Digital
Address any vulnerabilities identified from new IT Health Assessment	ANNUALLY	G	Jan-24	Working on the items that have been flagged in the ITHC assessment.	HoS - Customers, IT & Digital
Membership of NCSC, CiSP, Cyber Sharing platforms & tools deployed	ANNUALLY	G	N/A	Ongoing membership for early warnings	HoS - Customers, IT & Digital
Staff awareness and training	ANNUALLY	G	N/A	Mandatory training has been supplied. Ongoing awareness campaigns periodically	HoS - Customers, IT & Digital
Ensure before procurements are made for hosted solutions that suppliers provide suitable responses to the NCSC 14 Cloud Principles.	ANNUALLY	G	N/A	NCSC Cloud Principle responses obtained at the earliest point of tenders.	HoS - Customers, IT & Digital

Failure to fulfil statutory or legislative responsibilities - safeguarding



Current risk description

Norwich City Council has a duty to promote the welfare of and to safeguard all children and vulnerable adults from harm

Date raised	01/04/2020
Last review date	20/01/2024

	Residual Risk				
	Impact	Score			
Q4	5	3	15		
Q1	5	3	15		
Q2	5	3	15		
Q3	5	3	15		
Q4			0		

Target Risk					
Impact	Impact Likelihood Score				
4	3	12			
4	3	12			
4	3	12			
4	3	12			
		0			

Primary Corporate Priority		
5 - Norwich City Council is in good shape to serve the city		

Risk owner	
Exec Dir - Community Services	
Service area	
Housing & Community Safety	

Current risk direction		
Static	\$	

Progress	Publication Exempt?
ON TRACK	N

Background to this risk

Norwich City Council considers that all children and adults, whatever their age, culture, gender, origin, sexual orientation, skills, ability and beliefs have the right to protection from abuse. We have a duty to promote the welfare of all and safeguard them from harm as far as reasonably possible. It is the council's responsibility to do this by raising awareness to all employees and providing training to relevant officers across the organisation and council members on safeguarding children and vulnerable adults so they understand their safeguarding responsibilities

Triggers

Lack of understanding the statutory and legislative responsibilities

Lack of awareness of legislative changes and new legislation

Failure to implement statutory duties and responsibilities

Lack of required skills knowledge and experience of key officers tasked to fulfil statutory or legislative responsibilities

Insufficient organisational capacity

Ineffective procedures and processes

Lack of clarity of roles and ownership of legislative responsibilities (H&S, safeguarding, equality etc)

Delegation of responsibilities where services are with a contractor

Main impacts

Financial costs in compensation & fines

Intervention if complete failure

Acting illegally

Non-compliance with Payment Card Industry (PCI) standards which results in financial fines

Wrong decision being made

Negative impact on the council's reputation

Being held to account by overseeing organisations (eg children safeguarding) maybe included in reputation

Failure to fulfil statutory or legislative responsibilities - safeguarding



Control / mitigation (action required)	Control update frequency	Control status (RAG)	Date of next update	Update on progress of control / mitigation	Contol / Mitigation Owner
Undertake Safeguarding Audit	ANNUALLY	G	Complete	Complete - two main findings were DBS policy review and assurance that checks are carried out. Safeguarding training to be completed by all relevant staff and evidenced on Learning Room.	Early Intervention and Community Safety Manager
Embed learning across council teams	ANNUALLY	G	ı ıvıar-24	Safeguarding training to be completed by all relevant staff and evidenced on Learning Room.	Early Intervention and Community Safety Manager
Review corporate processes and role requirements regarding organisational DBS checks	ANNUALLY	G	Mar-24	January 2024 – corporate policy re: DBS checks and roles requiring them, to be shared with SLT and internal safeguarding group asap. Data re: compliance with policy (ie numbers of roles requiring DBS that have successfully obtained them) to also be shared with SLT and internal safeguarding group on a 6 monthly basis.	HoS - HR and Organisational Development

Contract management - governance



Current risk description

Ineffective management of contracts leads to poor service delivery

Date raised	01/08/2020
Last review date	08/01/2024

	Resi	dual Risk	
	Impact	Likelihood	Score
Q4	3	3	9
Q4 Q1	3	3	9
Q2 Q3	3	3	9
Q3	3	2	6
Q4			0

Target Risk		
Impact	Likelihood	Score
2	3	6
2	3	6
2	2	4
2	2	4
		0

Primary	Corporate	Priority

1 - People live well and independently in a diverse and safe city

Risk owner
Exec Dir - Corporate & Commercial Services
Service area
Legal & Procurement

Current risk direction	
Improving	Û

Progress	Publication Exempt?
ON TRACK	N

Background to this risk

This risk grew in prominence during 2021 following the identification of concerns relating to the management of specific contracts. Additional mitigating actions have been undertaken to reduce the risk scoring, with further actions identified. Following the outcomes of the Local Partnerships governance work and a recent internal audit report we are reducing the likelihood of this risk.

Triggers

Resourcing of contract management and training inadequate

Clarity of service area accountability & roles and responsibilities poor

Contract managers not fully aware of the risks to service delivery in their contracts

Inadequate SLA / KPIs / MI identified in tender / contracts documents with lack of escalation of contract issues

Main impacts

Third party relationships and contracts not managed appropriately causing:

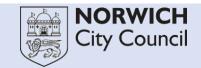
- contract value not realised / obligations not carried out
- poor performance
- financial loss / poor value for money
- legislative requirements not met / regulatory / legal fine or censure
- reputational impact
- lack of visibility of supplier performance

Contract management - governance



Control / mitigation (action required)	Control update frequency	Control status (RAG)	Date of next update	Update on progress of control / mitigation	Contol / Mitigation Owner
Implementation of the contract accounting module of the new ERP system to help improve management of contract spend	QUARTERLY	Α	Sep-24	This has been delayed whilst the ERP system gp live is the focus. We will need to consider this carefully alongside the emerging new procurement regulations.	HoS - Legal & Procurement
Implement outcomes of local partnerships report	QUARTERLY	G	Mar-24	The final report has been produced and an action plan agreed by the shareholder panel.	HoS - Legal & Procurement
Evaluate outcome of internal audit review of procurement and contract management	QUARTERLY	G	Mar-24	The draft internal audit outcomes have been received and do not raise any significant concerns in respect of contract management	HoS - Legal & Procurement
Establishment of contract management practitioner group to support dissemination of best practice within the organisation	QUARTERLY	G	Complete	Completed	HoS - Legal & Procurement





Current risk description

Loss of public subsidy to enable the development of this signficant regeneration site

Date raised	Q4 21/22
Last review date	09/01/2024

	Resi	dual Risk	
	Impact	Likelihood	Score
Q4	4	3	12
Q1 Q2	4	3	12
Q2	4	3	12
Q3	4	3	12
Q4			0

	Target Risk			
Impact	Likelihood	Score		
4	2	8		
4	2	8		
4	2	8		
4	2	8		
		0		

Primary Corporate Priority
3 - Norwich has the infrastructure and housing it needs to be a successful city

Main impacts

Risk owner
Exec Dir - Development & City Services
Service area
Planning & Regulatory Services

Current risk direction	
Static	\$

Progress	Publication Exempt?
ON TRACK	N

Background to this risk

Norwich City Council secured £15m on Housing Infrastructure Funding to assist with delivery of the Anglia Square regeneration. Following the Secretary of State's decision to call-in the application for his own determination, and his subsequent decision to refuse it contrary to his inspector's recommendation, the scheme cannot be built in accordance with the timetable agreed in the HIF contract. There is therefore a risk that the

Triggers

Failure to be able to draw down £15m of funding previously secured from HE in order to assist delivery of Anglia Square redevelopment

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

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

Failure to report on HIF milestones, submit claims and complete all HE reporting and recording required may lead to HIF being withdawn. Advice from HE is to recruit a specific role to carry out the monioring.

Lack of monitoring data to enable release of credits to mitigate NN to enable commencement

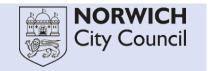
Threat to the redevelopment of Anglia Square – continued blight on northern city centre
New housing and commercial development not delivered – needs remain unmet
Loss of future council tax and business rates income to council
Non-compliance with Payment Card Industry (PCI) standards which results in financial fines



Failure to draw down £15m of Housing Infrastructure Fund (HIF) money previously secured from Homes England (HE) to assist with the delivery of Anglia Square.

Control / mitigation (action required)	Control update frequency	Control status (RAG)	Date of next update	Update on progress of control / mitigation	Contol / Mitigation Owner
Discussions being held between housing and P&RS re monitoring data to enable release of NN mitigation credits	QUARTERLY	R	A 24	Mitigation measures not being fitted into our stock by NCSL, Gasway and CSC. Mitigation delivery behind target. Potential to impact on ability to release scheme to start.	HoS - Planning & Regulatory Services
CIL ECR Application expected October 2023. Determination dates to be confirmed once received	QUARTERLY	G		• • • • • • • • • • • • • • • • • • • •	HoS - Planning & Regulatory Services
Contract drafting	QUARTERLY	G			HoS - Planning & Regulatory Services

Failure to deliver acceptable levels of performance in regulatory services



Current risk description

Failure to provide statutory services to an adequate standard resulting in harm to residents/visitors and businesses in Norwich

Date raised	26/01/2022
Last review date	09/01/2024

	Residual Risk				
	Impact	Likelihood	Score		
Q4	4	3	12		
Q1	4	3	12		
Q2	4	3	12		
Q3	4	3	12		
Q4			0		

Current risk direction

Static

	Target Risk	
Impact	Likelihood	Score
4	2	8
4	2	8
4	2	8
4	2	8
		0

Target Risk			
Impact	Likelihood	Score	
4	2	8	
4	2	8	
4	2	8	
4	2	8	
		_	

ihood	Score
2	8
2	8
2	8
2	8
	0

Progress	Publication Exempt?
ON TRACK	N

Drimary	Corporate	Driority
	COLDOL SILE	

3 - Norwich has the infrastructure and housing it needs to be a successful city

Risk owner
Exec Dir - Development & City Services
Service area
Planning & Regulatory Services

Background to this risk

There are a number of backlogs and outdated processes in regulatory services that are in need of addressing. Following a peer review the head of service is working to deliver an improvement plan

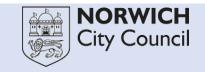
Triggers
Large backlogs of applications needing to be addressed
Failure to avert avoidable harm to public
Increased challenge/complaint re: decisions made
Failure to comply with Private Hire vehicle compliance standards

Main impacts Reputational harm - restricted ability to charge Reputational harm - potential legal risks

Failure to maximise income

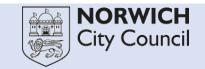
Non-compliance with Payment Card Industry (PCI) standards which results in financial fines

Failure to deliver acceptable levels of performance in regulatory services



Control / mitigation (action required)	Control update frequency	Control status (RAG)	Date of next update	Update on progress of control / mitigation	Contol / Mitigation Owner
Backlogs being monitored for improvement	QUARTERLY	Α	Jan-24	FOOD: The team has achieved the Food Standards Agency (FSA) targets set out in the Covid Recovery Plan. An estimated 1356 inspections are due for inspection in 2023-24 (made up of 283 higher risk premises; 645 lower risk premises and 430 newly registered premises). The food and safety team has now been restructured and 2 additional food competent inspectors will be employed shortly. The inspection backlogs in Norwich are consistent with the National picture.	HoS - Planning & Regulatory Services
Backlogs being monitored for improvement	QUARTERLY	Α	Jan-24	TAXI LICENSING: The dedicated officer to deal with the backlog has left the Council and other resources ahve been directed to HMO Licensing backlogs as these are more of a priority. After widening the permitted medical providers, there remain some 'hangover' drivers who, despite the changes, have not provided their medicals – some are also without DBS applications. There are 16 that can be revoked under delegated powers. That will leave 3 drivers that need to go to licensing sub-committee for a decision as they are for reasons that do not have delegated authority. These will be programmed for next month's meeting. This service is priority 2 for review of use of IT to streamline processes.	HoS - Planning & Regulatory Services

Failure to deliver acceptable levels of performance in regulatory services



Control / mitigation (action required)	Control update frequency	Control status (RAG)	Date of next update	Update on progress of control / mitigation	Contol / Mitigation Owner
Project delivery	QUARTERLY	G	Apr-24	HMO LICENSING: Draft licenses issued/Inspections booked - 2 x licensing officers working for 3 days on processing complete applications, issuing draft licenses, and booking in inspections visits. Due for completion by End of March 2024.PM recruited and full project plan to be drafted by 31/01/2024. Team in place. Delivery of process mapping underway. Contracts all signed. Regular reporting to DACs Board to ensure progress. Financial tracker developed. ON track.	HoS - Planning & Regulatory Services

Failure to address Natural England advice on Nutrient Neutrality (NN)



Current risk description

The determination of planning applications continues to be held up with resulting negative impacts on economy of Norwich and housing delivery.

Date raised	13/06/2022
Last review date	09/01/2024

	Residual Risk					
	Impact	Likelihood	Score			
Q4	5	3	15			
Q1	5	3	15			
Q1 Q2 Q3	5	3	15			
Q3	5	3	15			
Q4			0			

	Target Risk					
	Impact	Score				
	2	5	10			
	2	5	10			
	2	5	10			
Ĭ	2	5	10			
ĺ			0			

re	
)	3 - Norwich has the infrastructure and housing it needs
)	to be a successful city
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)	

Primary Corporate Priority

Risk owner
Exec Dir - Development & City Services
Service area
Planning & Regulatory Services

Current risk direction				
Static	\$			

Progress	Publication Exempt?
ON TRACK	N

Background to this risk

Natural England introduced new guidance in March 2022 which requires most development in Norwich to be able to demonstrate it is nutrient neutral in order for planning approval to be issued. The result of this has been the inability of the Council to grant and new planning permissions for homes and other forms of overnight accommodation since this date.

Triggers

Sustained period when planning decisions cannot be issued due to lack of identified mitigation

Large backlogs of applications needing to be determined once mitigation strategy identified

Loss of staff due to uncertainty over decision making ability

Failure to join JV

Main impacts

Impact on deliverability of large strategic schemes: Anglia Square / East Norwich

Failure to maximise income. Planning income and CIL income now down. Should be recoverabe in time.

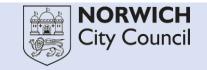
Staff morale drops

Non-compliance with Payment Card Industry (PCI) standards which results in financial fines

Potential impact on Government performance indicators if developers do not agree Extension Of Time (EOT) – special measures

Failure to deliver housing growth if we don't join the JV as insufficient mitigation headroom in City Council own scheme.

Failure to address Natural England advice on Nutrient Neutrality (NN)



Control / mitigation (action required)	Control update frequency	Control status (RAG)	Date of next update	Update on progress of control / mitigation	Contol / Mitigation Owner
Provision of our own mitigation scheme through retrofitting of housing stock.	QUARTERLY	R	Apr-24		HoS - Planning & Regulatory Services
Join Joint Venture or await Natural England Scheme.	QUARTERLY	R	A 24	Decision to join JV refused in March 2023. Awaiting report from PWC on risks and mitigations before further Cabinet report can be taken. Report expected 18 Jan 24. Expected March cabinet decision. Decision on housing applications remain delayed.	HoS - Planning & Regulatory Services

Cost of living (COL) crisis has a negative impact on the city and the council



Current risk description

The cost of living crisis: increases financial, social and health inequalities for Norwich residents; reduces the effectiveness of council services as demand increases; and reduces council income, so further limiting our ability to deliver for the city

Date raised	18/07/2022
Last review date	13/12/2023

Residual Risk						
	Impact Likelihood Score					
Q4	4	4	16			
Q1	4	4	16			
Q2	4	4	16			
Q2 Q3 Q4	4	4	16			
Q4			0			

Target Risk					
Impact	Score				
3	4	12			
3	4	12			
3	4	12			
3	4	12			
		0			

Primary	Corporate	Priority

1 - People live well and independently in a diverse and safe city

Risk owner		
Exec Dir - Community Services		
Service area		
Strategy, Engagement & Culture		

Current risk direction		
Static	(

Progress	Publication Exempt?
ON TRACK	N

Background to this risk

The cost of living crisis will continue to affect Norwich residents, particularly those already struggling financially. We know inflation and energy costs will continue to be a problem, so the impact will become more widespread and more extreme over the winter. Although energy costs are begining to fall, inflation is still high and persistant hardship is a problem.

Triggers Rising cost of living Increasing rents and mortgage Inflation level PRS rental costs

Main impacts

Increased debt, hunger, health problems and homelessness for city residents

Increased demand on services (council and voluntary, community & social enterprise (VCSE) led), leading to reduced effectiveness/speed as teams have to deal with greater volumes

Reduced income to the council, as people are unable to pay what they owe

Non-compliance with Payment Card Industry (PCI) standards which results in financial fines

Increased pressure on council and VCSE staff, including emotional pressures where we cannot provide all the help that people need

Cost of living (COL) crisis has a negative impact on the city and the council



Control / mitigation (action required)	Control update frequency	Control status (RAG)	Date of next update	Update on progress of control / mitigation	Contol / Mitigation Owner
Cost of Living officer group developing joined-up response to COL crisis	QUARTERLY	Α	Mar-24		HoS - Strategy, Engagement and Culture
Grant-funding for Social Welfare Advice (SWA) service from Financial Inclusion Consortium (FIC). Quarterly FIC meetings with partners to discuss current issues relating to debt, welfare benefits and housing, sharing knowledge and working to maximise income / reduce debt	QUARTERLY	Α	Mar-24	,	HoS - Strategy, Engagement and Culture
Joined-up approach to debt including non-commercial debt policy, multi- service area debt meetings to review policies and identify opportunities; vulnerability meetings and debt-management flags; specialist money advice team in place; regular reporting on levels of debt; keeping debt collection practices under review	QUARTERLY	G	Mar-24	Regular meeting with CA debt team. Multi service area approach through regular debt meetings and concerns flagged at other key meetings meetings. NCAN referrals and budget and money advice support from internal teams. Finance will be leading a review of the noncommercial debt policy. Work continues with Salford university and other LAs to look at solutions for supporting deficit budgets.	HoS - Strategy, Engagement and Culture

Cost of living (COL) crisis has a negative impact on the city and the council



Control / mitigation (action required)	Control update frequency	Control status (RAG)	Date of next update	Update on progress of control / mitigation	Contol / Mitigation Owner
Sustainable warmth programme	QUARTERLY	G	Mar-24	The council is delivering a range of measures to make Norwich's least energy efficient households warmer including capital energy efficiency projects and access to government funding and advice. The Sustainable Warmth Strategy identifies the need for widescale retrofitting of housing across the city as the ultimate strategic solution to fuel poverty. We are expecting funding for HSF to stop at the end of March '24 and are working through the impact of this which will likely be felt most in the autumn / winter of 24/25.	HoS - Strategy, Engagement and Culture
Existing funding streams	QUARTERLY	Α	Mar-24		HoS - Strategy, Engagement and Culture

Climate Change risk to Council and its residents



Current risk description

Climate change means council buildings and commercial buildings will not meet health and safety requirements and maintenance costs may also increase. People affected by inequality are likely to suffer disproportionately from the adverse effects of climate change and inequality is likely to increase (similar to COVID 19) Flooding and other enviornmental impact risks will also increase.

Date raised	01/06/2022
Last review date	22/01/2024

Residual Risk				
	Impact	Likelihood	Score	
Q4	4	4	16	
Q1 Q2	4	4	16	
Q2	4	4	16	
Q3	4	4	16	
Q4			0	

Target Risk					
Impact	Impact Likelihood				
3	4	12			
3	4	12			
3	4	12			
3	4	12			
		0			

Primary (Corporate	Priority
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1 - People live well and independently in a diverse and safe city

Risk owner
Exec Dir - Community Services
Service area
Strategy, Engagement & Culture

Current risk direction		
Static	⇔	

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Progress	Publication Exempt?
ON TRACK	N

Background to this risk

The Council will need to spend significant amounts of resources to adapt operational buildings and commercial properties will need modernising to maximise rents. Equally, many services may see significant cost increases.

Disadvantaged groups are likely to have an increased exposure to the adverse effects of climate change, largely due to their lower fiscal resilience. The Council will also face associated costs due to health and wellbeing risks supporting vulnerable residents.

Extreme hot and cold weather, flooding, high winds and infestation leading to a range of events affecting our communities and council operations.

Main impacts

Financial impact on vulnerable residents - increased costs on already stretched finances due to increased use of energy and water (fans, showers, heating, dehumidifiers etc) and increased reliance on benefits and foodbanks if unable to work due to extreme weather

Financial Impact on council housing and temporary accommodation - property repair, decant costs, insurance costs.

Financial impact of commercial properties needing to meet new requirements to maintain lettings

Non-compliance with Payment Card Industry (PCI) standards which results in financial fines

Additional costs in tarmac melting, replacement of other council assets damaged by heat, flooding or other environmentally driven conditions.

Land has increased flooding risk, making development more challenging to deliver

Climate Change risk to Council and its residents



Control / mitigation (action required)	Control update frequency	Control status (RAG)	Date of next update	Update on progress of control / mitigation	Contol / Mitigation Owner
Policy/strategy - Develop and implement the new Equality diversity and inclusion (EDI) strategy, ensuring recognition of climate change	QUARTERLY	G	Mar-24	The EDI stratgey was agreed at Cabinet in January 2024. Work will now commence on the development of an action plan, which will be heavily informed by the consultation already undertaken and by information gathered via our corporate plan engagement exercise in and in discussion with other partners. Timlines for the work will be confirmed via the upcoming business planning process.	Head of Strategy, engagement & culture
Policy/strategy - Develop and implement the new affordable warmth strategy, ensuring recognition of inequalities	QUARTERLY	G	Mar-24	Since the adoption of the sustainable warmth strategy the council has been delivering a range of measures to make our least energy efficient households warmer. The Council continues to award emergency fuel payments to vulnerable residents to help with energy and fuel costs. The groundwork East 'green doctors' project will support the city's most vulnerable residents, with advice on paying bills and managing debt, signposting to energy efficiency funding, and improving their living conditions. The scheme will be integrated with other support offers so that support is targeted where it is most needed.	Head of Strategy, engagement & culture
Policy/strategy - Develop and implement the new environmental statement, ensuring recognition of inequalities	QUARTERLY	А	Mar-24	The Environmental Statement has been incorporated into a comprehensive Environmental Programme document which recognises inequalities and the necessity to integrate with other council strategies. The Programme document is a 'high level' and overarching document which sets out the context and need for a new citywide climate action strategy and plan, reitterates the need for a council climate action strategy and plan including housing and integrates the existing biodiversity strategy. The draft programme document will be consulted on internally	Head of Strategy, engagement & culture
Policy/strategy - Develop and implement the new biodiversity strategy ensuring recognition of inequalities	QUARTERLY	A	Mar-24	The Biodiversity Strategy was adopted by Cabinet in November 2022. With the implementation of Biodiversity Net Gain (BNG) (January 2024) there will be a significant opportunity to increase access to green space for and within vulnerable communities. The Council's BNG Steering Group is overseeing this work to ensure that maximum beneficial outcomes are achieved. The Council has supported the 7000+ project with the Greenhouse Trust to plant 7000 new trees in Norwich by 2030 are also supporting the newly formed Sustainable Food Norwich Partnership which is looking at sustainable and affordable food provision in and around Norwich.	Head of Strategy, engagement & culture

Climate Change risk to Council and its residents



Control / mitigation (action required)	Control update frequency	Control status (RAG)	Date of next update	Update on progress of control / mitigation	Contol / Mitigation Owner
Policy/strategy - Develop and implement a new retrofitting strategy for council owned assets ensuring recognition of inequalities	QUARTERLY	Α	Mar-24	A carbon reduction plan for housing has been produced, which sets out estimated carbon emissions and principles for improvements to council owned homes. Further work has identified specific opportunities and technologies to retrofit council-owned assets. A Scrunity Committee appointed Task and Finish focused on HRA retrofitting during 2023. The council is estimating emissions from non-housing council owned buildings, and these will be included in the Council's Climate Action Plan which will be further developed on during 2024.	Head of Asset Management
Financial - Grant funding secured to improve the energy efficiency of properties across the city etc Cosy City	QUARTERLY	A	Mar-24		
Awareness/Engagement - consider how we best educate people on how they can plan for climate change throughout the year, in partnership with Norwich Climate Commission	QUARTERLY	G	Mar-24		Head of Strategy, engagement & culture
Working practices - Cost of living crisis (COLC) group established	QUARTERLY	G	Mar-24		Head of Strategy, engagement & culture
Working practices Ensuring effective focus and join up across relevant teams working with those who are marginalised by socio economic and environmental issues	QUARTERLY	Α	Mar-24	Relevant teams are involved in the COLC, EDI officer working groups, and NHWP, and working together with external partners. Development of EDI policy and action plan A programme of environmental briefings is currently underway for officers of the council.	Head of Strategy, engagement & culture

Climate Change risk to Council and its residents



Control / mitigation (action required)	Control update frequency	Control status (RAG)	Date of next update	Update on progress of control / mitigation	Contol / Mitigation Owner
Working practices - Work with Norwich Climate Commission to address climate justice issues	QUARTERLY	G	Mar-24	The Council has requested the assitance of Norwich Climate Commission to develop a citywide Climate Action Strategy and Plan. Specific to this strategy is the need to ensure Norwich's transition to a net zero city is 'fair and just'.	Head of Strategy, engagement & culture
Working practices - Work with health and wellbeing partners to identify measures that can be put in place in cases of climate change events for those most affected, especially by extreme heat and cold weather conditions	QUARTERLY	G	Mar-24	Norwich Health and Wellbeing Partnership strategy being developed. Action groups are in place leading on the three themes: physical and mental health and wellbeing; social and economic wellbeing; and community resilience and voice. By aligning health and wellbeing work to the City Vision, the Council's Corporate Plan, and Environmental and Biodiversity work, we will seek to maximise opportunities to work with those most affected by climate change events.	

Impact of economic downturn on key council suppliers



Current risk description

The current economic conditions increases the risk of a key supplier to the Council failing, or suppliers experiencing financial difficulties and therefore seeking to vary contracts to change their inherent risk profile

Date raised	18/10/2022
Last review date	01/01/2024

	Residual Risk					
	Impact	Likelihood	Score			
Q4	4	4	16			
Q1	4	3	12			
Q2	4	3	12			
Q3	4	3	12			
Q4			0			

Target Risk				
Impact	Impact Likelihood			
4	2	8		
4	2	8		
4	2	8		
4	2	8		
		0		

Primary	Corporate Priority
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5 - Norwich City Council is in good shape to serve the city

Risk owner
HoS - Legal & Procurement
Service area
Legal & Procurement

Current risk direction		
Static	\$	

Progress	Publication Exempt?
ON TRACK	N

Background to this risk

The economic environment remains challenging for suppliers, which will not be assisted by further increases in interest rates. This risk occurred in February 2023 where a supplier gave notice they were withdrawing from a market, albeit the Council was able to take swift action to rectify. We have also seen suppliers indicating moves that may be suggestive of changing risk profiles such as levels of insurance cover.

Triggers

Supplier failure - key supplier enters administration

Supplier seeks to exit market or amend terms of contract

Supplier experiences problems in their own supply chain delaying delivery of Council projects or deteriorating quality of service

Main impacts

Inadequate or poor service to residents as a result of problems with suppliers leading to dissatisfaction

Pressure on the organisation as a result of needing to focus on finding new suppliers or amending contract terms

Potential increased risks to organisation of suppliers wishing to change risk profile of contracts or look for up-front expenditure

Non-compliance with Payment Card Industry (PCI) standards which results in financial fines

Impact of economic downturn on key council suppliers



Control / mitigation (action required) Regular checks on key suppliers to identify their financial resilence and potential areas of risk to the Council	Control update frequency QUARTERLY	Control status (RAG)	Date of next update Mar-24	Update on progress of control / mitigation This process continues to be undertaken on an ongoing basis to highlight potential significant risks.	Contol / Mitigation Owner HoS - Legal & Procurement
Specific action taken with services where supplier is identified at risk	QUARTERLY	G	Mar-24	Following the quarterly checks, those areas where suppliers were identified as significant risk are having meetings to identify steps to be taken	HoS - Legal & Procurement
Awareness and identification with staff of steps that need to be taken to manage supplier risk	QUARTERLY	G	Mar-24	We continue to communicate information regarding suppliers at risk to key officers	HoS - Legal & Procurement
Contract managers to update business continuity plans with respect the risks of supplier failure	QUARTERLY	G	Mar-24	We have discussed this with the new Emergency Planning Manager to ensure they are aware. The emergency planning manager will be included on quarterly checks moving forwards.	HoS - Legal & Procurement
Monitoring of supplier behaviour and requests	QUARTERLY	G	Mar-24	We have established a process for any concerns related to supplier activity to be reported. No specific or significant concerns at the date of update	HoS - Legal & Procurement

Temporary and Supported Accommodation - Reducing the Housing Benefit Subsidy gap



Current risk description

The ability to claim 100% Housing Beneft subsidy is dependant on a number of relevant criteria depending on the type of housing and support provided. The gap between Housing Benefit we can claim back is growing due to the type of provision in the Temporary/Exempt Supported sector and also TA/Private Sector leasing, which is expensive.

Date raised	16/05/2023
Last review date	12/01/2024

Residual Risk						
Impact Likelihood Sco						
Q4	N/A	N/A	N/A			
Q1	5	3	15			
Q2	5	3	15			
Q3	5	3	15			
Q4			0			

Target Risk					
Impact	Score				
N/A	N/A	N/A			
4	3	12			
4	3	12			
4	3	12			
4	3	12			

Driman	, Corn	orate	Priority
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5 - Norwich City Council is in good shape to serve the city

Risk owner
Exec Dir - Housing & Community Safety
Service area
Multiple Service Areas

Current risk direction		
Static	(

Progress	Publication Exempt?
ON TRACK	z

Background to this risk

During 2022/23 it became very visible that the gap in Housing Benefit subsidy for temporary and exempt supported accommodation and TA/Private Sector leasing was growing. A Housing provider changed its operating method without informing the Council. This led to a large number of claims having to be amended and also a claw back of overepaid subsidy by the DWP. Housing and Benefits services are now working together on a project to develop a strategy for this type of accommodation, looking to bridge any gap in loss of subsidy by utilising other funding opportunities and working with providers to deliver services where maximum subsidy can be obtained, be it 100% or less.

Triggers

Monthly monitoring of the subsidy claim

New/Existing provision of this type of accommodation

Failure to consider the cost of any HB subsidy shortfall when commissioning provision

DWP review of provision- requirement to place an indicator on every claim by 31/3/24

Main impacts

Cost-budget

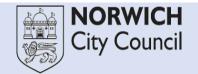
If not budgetted for this currently impacts on the Revs and Bens service budget

If not monitored monthly but treated as a risk until the end of the FY, the subsidy gap could be greater than expected

Non-compliance with Payment Card Industry (PCI) standards which results in financial fines

On hold pending new legislation and input into consultation

Temporary and Supported Accommodation - Reducing the Housing Benefit Subsidy gap



Control / mitigation (action required)	Control update frequency	Control status (RAG)	Date of next update	Update on progress of control / mitigation	Contol / Mitigation Owner
Steering group formed to work through the issues	MONTHLY	G	Completed		HoS - Housing & Community Safety
Action Plan developed	MONTHLY	G	Mar-24	In place and monitored at steering group	HoS - Revenues & Benefits
Housing strategy for this type of accommodation developed	QUARTERLY	G	Completed	· · · · · · · · · · · · · · · · · · ·	HoS - Housing & Community Safety
Benchmarking undertaken	QUARTERLY	G	Completed	First meeting 9th June 23. Widening to other cities	HoS - Revenues & Benefits
Draft strategy completed	QUARTERLY	G	Completed	On hold now pending new legislation	HoS - Revenues and Benefits