

**Committee Name: Audit**

**Committee Date: 21/09/2021**

**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 three corporate priorities, which are:

- People living well
- Great neighbourhoods, housing and environment
- Inclusive economy

This report meets all the corporate priorities

This report addresses healthy organisation strategic action in the Corporate Plan

## **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 Q1 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.
3. The council identified a need to reconstitute its arrangements for managing risk as a priority action included in the 2020 Annual Governance Statement. In 2020/21 a full refresh of the corporate risk register was undertaken, with internal audit working with directors and the Corporate Leadership Team through a mix of discussion and workshops to reset risk registers from scratch.
4. 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 Q1 Corporate Risk Register.

### **Actions Taken**

5. Several actions have been since the last report to further enhance and embed the risk management process. These include:
  - Ensuring the corporate risk register is fully populated with clear risk owners and actions identified.
  - Re-aligning the corporate risk register to the new senior management structure.
  - Incorporating the review of the corporate risk register into the quarterly corporate performance review process and timetable.
  - Reviewing the risk management strategy and policy. The updated draft of the document is a separate item on the committee agenda.
6. Whilst significant progress has been made, further work needed to embed the risk management approach across directorates and service planning. This should ensure a systematic and fluid process exists to feed risks up to the corporate risk register where warranted.
7. Directorate-level risk registers are in place which mirror the format of the corporate risk register, but further work is needed to fully populate and review these risks with teams. This requirement was captured as part of the 2020/21 Annual Governance Statement action plan and is being monitored through the corporate leadership team.
8. The internal audit plan for 2021/22 includes a review of the risk management arrangements. The outcome will be reported through the Committee as part of the normal reporting arrangements.

## Q1 Corporate Risk Register

9. 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**. It continues to reflect the considerable challenges and risks associated with Covid-19 and its impacts on the financial resilience of the council and its ability to support the community through continuing times of uncertainty.
10. No risks have been adjusted upward regarding their current risk score and no directorate risks have been highlighted for possible escalation.
11. One new risk has been developed regarding the council's approach to waste and recycling and included in the Corporate Risk Register (Risk 16). No risks have been adjusted upward regarding their current risk score and no directorate risks have been highlighted for possible escalation.

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

	Current residual risk			Risk Direction
	Impact	Likelihood	Combined	
R1: Council Funding Short Term	4	2	8	↔
R2: Council Funding Medium-Long Term	5	3	15	↔
R3: Commercialisation	4	2	8	↔
R4: Health & safety in the workplace	4	2	8	↔
R5: Further Waves of Covid-19	5	4	20	↔
R6: Impact of Brexit	3	5	15	↔
R7: Business Continuity/Emergency Event	4	3	12	↔
R8: Sustained increase in homelessness and temporary accommodation	3	3	9	↓
R9: Cyber Security & GDPR compliance	4	3	12	↔
R10: Joint Venture contracts	3	4	12	↔
R11: Failure to fulfil statutory or legislative responsibilities - safeguarding	5	3	15	↔
R12:	Removed due to confidentiality			
R13: Occurrence of a significant event	Merged with R7			
R14: Antisocial behaviour	4	4	16	↔
R15: Contract Management – Governance	4	3	12	↓
Risk 16: Waste & Recycling	4	3	12	New

## Role of Audit Committee

12. 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

13. The Corporate Risk Register has been reviewed by the Corporate Leadership Team. The full risk register will be considered at Cabinet on 8 September 2021.
14. 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

15. 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.

## Legal

16. 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**

17. There are no alternative options to this report.

**Reasons for the decision/recommendation**

18. 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:****Contact Officer:**


Name: Hannah Simpson

Telephone number: 01603 989569

Email address: [hannahsimpson@norwich.gov.uk](mailto:hannahsimpson@norwich.gov.uk)




## Appendix 1: Corporate Risk Register Q1 2021/22


Risk: 1. Council Funding Short Term (covid-19 related)			Owner: Executive director of corporate and commercial services				Category: Finance & Resources		Risk Direction:	
Description/Triggers	Impact	Mitigation	Date Raised	Target Risk			Risk Strategy	Current Residual Risk		
			Consequence	Likelihood	Score	Consequence	Likelihood	Score		
<ul style="list-style-type: none"><li>• Council's financial position goes into significant deficit resulting in reserves falling below the prudent minimum level</li><li>• Insufficient general and earmarked reserves to address shortfall</li><li>• Or use of earmarked reserves impacts on ability to deliver other council projects (invest to save funded)</li><li>• Non-delivery of in-year saving to mitigate financial deficit</li></ul>	<ul style="list-style-type: none"><li>• Initial indications were that in 2020/21 the general fund will overspend by £7.2 million without further action.</li><li>• Relying solely on the general fund reserve to offset this would leave the reserve at an unsustainable level and below the £4.3m prudent minimum level.</li><li>• Without significant action and consideration of reserves the council will be at serious risk of being in a S114 position.</li><li>• Without a clear plan of action the council will have to begin engaging with CIPFA and the MHCLG.</li></ul>	<ul style="list-style-type: none"><li>• £3.9m unallocated reserves available to offset deficit whilst maintaining prudent level of reserve.</li><li>• As at the end of 31/3/21 the Council was awarded £2.8m of emergency Covid-19 funding from government. (£0.95m for 2021/22)</li><li>• Services have reviewed the capital programme and submitted opening briefs which were approved Feb 2021.</li><li>• Projects have been prioritised for review</li><li>• Corporate review of all 2020-21 revenue budgets to identified areas for immediately reducing in-year expenditure through additional controls on non-essential spend and recruitment.</li></ul>	Jun 20	4	2	8	Manage	4	2	8
			Risk Control Action							
			Action		Owner		Target Date	Update		
			Continue to lobby Government to fully compensate Norwich against the financial impacts of C19'		Chief Executive		Ongoing	<ul style="list-style-type: none"><li>• The Leader of the Council has written to the Prime Minister and Chancellor asking for the council to be fully compensated</li><li>• The Leader has also lobbied the local MPs</li><li>• Both the Leader and CEO are in regular discussion with other Norfolk Leaders and CEOs to lobby on this point, and are active members of the Key Cities network and are lobbying through that route</li><li>• The CEO has been in touch directly with the Chief Executive of the LGA to lobby for a fair settlement for Norwich and the wider sector.</li><li>• The CEO has also published articles in the MJ to lobby Government on this point</li><li>• The s151 officer ensures that all financial returns setting out the impact of covid on the council's budget are sent to MHCLG in a timely manner.</li></ul>		
			Comments:							






Risk: 3. 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	Consequence	Likelihood	Score	Risk Strategy	Consequence	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> <li>Uncertainty over the future government direction on commercial activity (PWLB consultation ongoing)</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>Commercial 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>Shareholder panel for NRL and NCSL created</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.		Executive director of development and city services		Sept 21		New and revised structures – Recruitment of delivery director completed. Recruitment of rest of team ongoing.	
			Produce a new asset management strategy.		Executive director of development and city services		Aug 21		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: 4. Health & safety in the workplace			Owner: Executive director of development and city services				Category: Finance & Resources		Risk Direction:		
Description/Triggers	Impact	Mitigation	Date Raised	Target Risk			Risk Strategy	Current Residual Risk			
				Consequence	Likelihood	Score		Consequence	Likelihood	Score	
<ul style="list-style-type: none"><li>Covid-19 and risk of spreading infection across the workplace.</li></ul>	<ul style="list-style-type: none"><li>New way of working has the potential to change the council's culture and make it a more modern organisation which supports a flexible approach to work/life balance for staff.</li><li>Impact of Covid-19 and duties to ensure social distancing and requirements to ensure safety in the workplace are addressed</li></ul>	<ul style="list-style-type: none"><li>Improved IT capabilities to allow more staff to work from home were developed and rolled out quickly, which has enabled the majority of staff to work from home since March.</li><li>Virtual council meetings are being held in order to limit the risk of spreading the disease through close contact, although the organisation will revert to 'face to face' meetings in the council chamber and committee rooms when it is appropriate to do so.</li><li>Hand sanitiser dispensers introduced across workplace.</li><li>Desk policy to ensure limited capacity adhered to &amp; 2m social distancing observed.</li><li>Mandatory e-learning modules for staff.</li><li>Implemented changes to internal layout and other safety measures within city hall</li><li>Mental health working group in place to support staff wellbeing &amp; resilience</li><li>Covid Risk Assessment</li><li>Provision of PPE</li><li>Risk assessments written for F2F meetings in City Hall</li></ul>	May 20	4	2	8	Manage	4	2	8	
			Risk Control Action								
			Action		Owner		Target Date		Update		
			City Hall Recovery Group formed		Exec Director of Communities		Ongoing		Monthly meetings taking place being chaired by Exec Director		
			IT roll out to support agile working		Infrastructure support manager		Completed				
			Accommodation assessment		Facilities Team Leader		Ongoing		Assessment of room/ desk occupancy and city hall capacity ongoing		
			Production of simplified service area risk assessments		HoP+RS and other HOS		TBC		Ongoing		
			Comments:								
			<ul style="list-style-type: none"><li>City Hall Covid Recovery Group formed to look at workplace issues to ensure compliance with government guidance. Now meeting monthly.</li><li>Service area recovery plans completed, and summary report produced.</li><li>14 Mental Health First Aiders have been trained to provide a first point of contact across the organisation</li><li>Risk assessments written for face-to-face meetings in the council chamber and other meeting rooms</li></ul>								

Risk: 5. Further waves of Covid-19:			Owner: Chief Executive				Category: Customer		Risk Direction:	
				Target Risk				Current Residual Risk		
Description/Triggers	Impact	Mitigation	Date Raised	Consequence	Likelihood	Score	Risk Strategy	Consequence	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></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</li><li>TCG and SCG have been stood down: Health Protection Board, attended by Chief Executive, providing oversight, with relevant NRF cells still operating</li><li>Local Coordinating Group re-established 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>Continued funding of Financial Inclusion Consortium and bids to Community Renewal Fund as mitigation to economic and deprivation risks</li><li>Close management of COMF budgets and exploration of re-charging opportunities</li></ul>	Jun 20	4	3	12	Manage	5	4	20
			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 Community Services		Ongoing	New posters, signage and toolkits sent to businesses based on new comms messaging and sector specific guidance changes. Further updates will be provided based on 19 July unlocking. Awaiting data from Public Health on lack of compliance for scheduling visits		
			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		Executive director of development and city services		Ongoing	Business as usual delivery		
			Implementation of lessons from scenario planning via Public Health		Executive Director of Community Services		Mid July	Moving SIA work to new Covid single team Escalation route for events to LCG Coordination of additional resource requirements in the event of surge Agreed response to tourism risk is in place via transport and housing options.		
			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		
			Communications		Executive Director of Community Services		Ongoing	Communications NRF cell continues with targeted comms and outreach to vulnerable groups		
			Continue to deliver grants and wider support to businesses.		Executive director of corporate and commercial services		Ongoing			

		<ul style="list-style-type: none"> <li>Working with Local Outbreak Management plan colleagues to scenario plan and ensure response is fit for purpose</li> </ul>	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	Operational Group convened with key stakeholders including County Council Director of Public Health, East Anglia University. Action plan in place including deployment of Covid safe advisors, more visible communications e.g. regular press conferences, continued review of data to identify hotspots and continued local contact tracing system. Development of a dedicated Covid response team (NR).
<b>Comments:</b>						

Risk: 6. Impact of Brexit			Owner: Chief Executive				Category: Customer		Risk Direction:	
Description/Triggers	Impact	Mitigation	Date Raised	Target Risk			Risk Strategy	Current Residual Risk		
				Consequence	Likelihood	Score		Consequence	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></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	3	5	15	Manage	3	5	15
			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		Jun 21	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		

						<p>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>
			<p><b>Comments:</b> Impacts from NRF Brexit Strategy  Trade deal between the UK and EU finalised late December 2020.  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>			


Risk: 7. Failure to respond to a critical, business continuity or emergency planning event			Owner: Chief Executive				Category: Processes & Systems	Risk Direction:		
Description/Triggers	Impact	Mitigation	Date Raised	Target Risk			Risk Strategy	Current Residual Risk		
			Consequence	Likelihood	Score	Consequence		Likelihood	Score	
<ul style="list-style-type: none"><li>• Occurrence of a significant event:<ul style="list-style-type: none"><li>○ Loss city hall</li><li>○ Denial of access to City Hall</li><li>○ ICT failure</li><li>○ Contractor collapse</li><li>○ Supply chain failure</li><li>○ Severe weather events</li><li>○ Loss of power</li><li>○ Sea level rise</li><li>○ Fuel shortages</li><li>○ Communications failure</li><li>○ Pandemic</li></ul></li><li>• The Council, businesses and members of the public in the city will also be at risk from the local effects of climate change in the medium to long term.</li><li>• Insufficient staff representation across strategic, tactical and operational levels to ensure resilience, effective response and enable full engagement within NRF structures</li></ul>	<ul style="list-style-type: none"><li>• Council/service es unable to function.</li><li>• Increase in demand on Council services</li><li>• Vulnerable service users unable to access services</li><li>• Reputational damage</li></ul>	<ul style="list-style-type: none"><li>• Business continuity plans in place</li><li>• Service areas Business Impact Analysis and Business Continuity Plans</li><li>• Work Area Recovery location for Customer Contact</li><li>• ICT Disaster Recovery Plan</li><li>• Incident Management Team response to business continuity incidents.</li><li>• BMG TTX - Exercise Appleyard 1 (14/12/16)</li><li>• BMG TTX - Exercise Appleyard 2 (26/7/17)</li><li>• Service area business continuity exercises</li><li>• Insurance policies</li><li>• Asset register</li><li>• Emergency planning strategy in place and maintained</li><li>• Incident specific response plans</li><li>• Rest centre and community centre plans</li><li>• Full participation in Norfolk Resilience Forum meetings</li><li>• Review of NRF risk assessments and Norfolk Community Risk Register</li><li>• Norfolk Emergency Response Guidance NRF multi-agency plans for specific risks</li><li>• Participation in training and exercises</li><li>• Good contract governance</li><li>• Services areas to raise at supplier engagement meetings potential risk of contractor for early warning.</li><li>• Service areas to gain knowledge of alternative suppliers that could deliver key services.</li></ul>	Apr 20	4	3	12	Manage	4	3	12
			Risk Control Action							
			Action		Owner		Target Date	Update		
			Emergency planning arrangements reviewed and updated		Environmental Health & Protection Manager		Completed	Arrangements have been reviewed; new actions added below.		
			Business continuity plans reviewed annually, including other stakeholder BCPs where these link to council services		Emergency Planning Manager & Service Managers		Completed	Existing provisions have been reviewed; new actions added below.		
			Completion of audit review (20/2/18) actions		Executive director of development and city services		Completed	Actions completed as far as practicably possible. Outstanding queries absorbed into the action below.		
			Consider reinstating Business Continuity Steering Group for effective business continuity management to provide a mechanism for monitoring and implementing measures to enhance business resilience		Executive director of development and city services		End Dec 21	New Internal Governance Boards introduced as part of new management structure. Business continuity to be reported to Workforce Board once set up and asap with a review of all BIAs and BC Plans required Autumn of 2021.and thereafter adoption of Corporate Business Continuity Plan by December 2021.		
			Work with emergency planning team in respect to plans for elections in May 2021 and include in plans specific covid-19 planning		Democratic & Elections Manager		Completed	May 2021 elections successfully completed. Election Contingency Plan updated 6 May 2021. Sewell election 17 June to be discussed.		
			Emergency Management Strategy		Executive Director of development and city services		Sep 21	Strategy reviewed and circulated for comment. To be presented Cabinet on 8/9		
			Senior managers trained to gold, silver and bronze response levels		Emergency Planning Manager		Sep 21	New council structure will require review of existing provisions		


		<ul style="list-style-type: none"> <li>• Links in-place to other stakeholder BCPs – e.g. Biffa and NCSL</li> <li>• Service areas to flag with contract managers risk of supplier collapse due to Covid or issues with supply change due to Brexit.</li> <li>• Completion of outstanding actions from previous EP and BC exercises</li> <li>• Emergency planning duty officer rota and procedures in place</li> </ul>	<p>Comments:</p> <p>TC - 5/7/21: Strategic emergency management training for all of CLT and Heads of Service undertaken 21 June. Gold/Silver response rota introduced to ensure resilience and cover. Elected Members role in emergency planning training undertaken on 25 June. Additional Emergency Planning Duty Officers identified and training is being delivered to further improve resilience of front-line response staff. Complete review of all rest centres is planned to ensure they are still appropriate and fit for purpose. Service Area Business Impact Analysis and Continuity Plans will be reviewed in the Autumn of 2021 to enable the wholesale review of the Corporate Business Continuity Plan. The service transformation will consider the role of a second Emergency Planning Officer (potential for a career grade post) to ensure continuity of service provision for the future.</p> <ul style="list-style-type: none"> <li>• Ebola 2014</li> <li>• Surface Water Flooding events - 2014, 2015 and 2016</li> <li>• Severe weather incidents: Gales - 23/2/17; 13/9/17; 18/1/18; Snow - 26/2–2/3/18; and 16/3/18</li> <li>• Coastal tidal surge mutual aid – 5/12/13; 23/11/15; 13/1/17</li> <li>• Demos/marches/protests impacting on council activities</li> <li>• Post Grenfell activities – MHCLG data collection 2017-18; Exercise Burleigh 24/4/18</li> <li>• Mile Cross Recycling Centre fire 26/7/18</li> <li>• Ashbourne Tower gas leak 14/11/18</li> <li>• Bluebell Road – suspected IED 23/11/18</li> <li>• Brexit planning 2018-19</li> <li>• COVID-19 response</li> </ul> <p>This risk has been combined with the previous risk 13 “Occurrence of a significant event”. Risk 13 to be deleted.</p>
--	--	--	---






Risk: 9. Cyber Security & GDPR 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>lack of staff awareness and training,</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 GDPR legislation</li> </ul>	<ul style="list-style-type: none"> <li>Data breaches and fines from the Information Commissioners Office (ICO) Mishandling sensitive information. The ICO can apply fines of the higher maximum amount, is £17.5 million or 4% of the total annual worldwide turnover in the preceding financial year, whichever is higher.</li> <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>Mandatory e-learning modules on systems security &amp; GDPR</li> <li>Corporate Information Group – monitor data breaches GDPR 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> </ul>	Jun 20	4	3	12	Manage	4	3	12
			Risk Control Action							
			Action		Owner		Target Date		Update	
			Address recommendations from the internal audit review of GDPR -. including Information asset register		Data Protection & Security Team Leader		Oct 21		Chasing final returns, 5 outstanding, 2 with Community Services, 3 with Development and City Services.	
			Programme to replace legacy IT systems		Head of Customers, IT & Digital		Sep 23		An extensive programme of work is in place to replace and refresh legacy systems.	
			Review the need to insure against cybersecurity attacks.		Head of Customers, IT & Digital		Sep 21		Once our compliance work for PSN has been completed (target date Sep 21) we can assess whether we have independent assurance of our estate which will play a factor on the risks/mitigation. We can then pick up this review and liaise with Business relationship & procurement manager.	
			Refresh the Staff Awareness Programme		Head of Customers, IT & Digital		Sep 21		New identified action, an update to follow on next report.	
			Address the vulnerabilities identified from the IT Health Assessment		Head of Customers, IT & Digital		Sep 21		The Executive Summary has been presented to CLT on 16th June. An action plan is active and Critical and High vulnerabilities are being worked on to be removed for September 2021	
			Review of IT Process/Policy Documentation		Head of Customers, IT & Digital		Oct 21		Ongoing. CIAG re-established with the new SIRO. Review underway to determine which policies to redraft first.	
			Comments:							


Risk: 10. Joint Venture contracts			Owner: : Executive director of community services				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>Ending the joint venture contracts with Norse group for property management and general fund and housing repairs &amp; maintenance (April 2022) and avoiding significant impacts on services.</li> <li>Poor relationship management</li> <li>Joint ventures not managed effectively, and key service outcomes not achieved.</li> <li>Contracts not managed effectively.</li> <li>Joint venture arrangements do not run to term or budget</li> </ul>	<ul style="list-style-type: none"> <li>Key services not delivered</li> <li>The Council does not get VFM</li> <li>Benefits of partner and contract management not realised.</li> <li>Specification not adhered to.</li> <li>Services not provided at an acceptable level</li> <li>Customer and staff complaints</li> </ul>	<ul style="list-style-type: none"> <li>Place project – multi officer project team and board in place to implement insourcing projects</li> <li>Business as usual workstream to oversee delivery and performance</li> <li>Revised key performance indicators for property and building maintenance contracts agreed</li> <li>Regular review of performance</li> </ul>	Jun 20	3	3	9	Manage	3	4	12
			Risk Control Action							
			Action		Owner		Target Date	Update		
			Recommendations from the internal audit review of the housing repairs & maintenance contract reviewed and action plan agreed		Executive director of community services		Oct 21	Updates provided to audit for May 21 to completed actions. Outstanding actions to be completed Oct 21		
			Safe transfer of environmental services to Norwich City Services Limited by 1.4.21		Chief Executive		Completed			
			Safe transfer of property and building maintenance services to Norwich City Services Limited by 1.4.22		Chief Executive		Jun 21 - Apr 22	Interim specialist and experienced resources recruited to lead project. – May 21. Review of governance, resources, and budget requirements Phase 2 – June 21. Project Place Board – Phase 2 internal governance will meet monthly to monitor and support project delivery.		
			Comments:							

Risk: 11. Failure to fulfil statutory or legislative responsibilities - safeguarding.			Owner: Executive director of community services				Category: Customer		Risk Direction:		
Description/Triggers	Impact	Mitigation	Date Raised	Target Risk				Current Residual Risk			
			Apr 20	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		
			Increase officer confidence in information sharing and understanding of when and how to do so appropriately		Early Intervention & Community Safety Manager		Sep 21		Training audit to be completed by end of September. This will enable a targeted programme of safeguarding training.		
			Safeguarding policy and risk embedded into contractors' and sub contractors' policy and practice		Early Intervention & Community Safety Manager		Sep 21		This forms part of planned safeguarding training programme, awaiting delivery.		
			Maintain safeguarding champion knowledge, understanding, confidence		Early Intervention & Community Safety Manager		Sep 21		This action is ongoing, with safeguarding champions meeting every two months.		
			Embed learning across council teams		Early Intervention & Community Safety Manager		Sep 21		There is 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 12: This risk is confidential and not for the public domain.

Risk 13: Occurrence of a significant event – This has been merged with Risk 7.

Risk: 14 Antisocial behaviour			Owner: Executive director of community services				Category:		Risk Direction:		
Description/Triggers	Impact	Mitigation	Date Raised	Target Risk			Risk Strategy	Current Risk			
			Impact	Likelihood	Score	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	Sep 21	There are still some significant gaps in capacity within the service. Review of next steps underway with proposal by end Sept 21.				
			New ASB team trained on and conversant with ASB risk assessment procedures		Early Intervention & Community Safety Manager	Sep 21	This is now complete and will be on-going. Temporary and new officers trained on corporate and national service standards. All staff subject to above update have been trained in: <ul style="list-style-type: none"><li>Visiting officer Risk assessments</li><li>Assessment of needs</li></ul> ASB case managed processes				
			Residents know how to report ASB to the council		Early Intervention & Community Safety Manager	Sep 21	Updates to ASB web pages completed. ASB Matrix completed to aid CCT staff when dealing with incoming ASB complaints.				
			Review of new ASB response arrangements to ensure effective		Early Intervention & Community Safety Manager	Sep 21	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: 15. Contract Management – Governance			Owner: Executive director of corporate and commercial services				Category: Processes & Systems		Risk Direction:		
			Target Risk				Current Risk				
Description/Triggers	Impact	Mitigation	Date Raised	Consequence	Likelihood	Score	Risk Strategy	Consequence	Likelihood	Score	
<ul style="list-style-type: none"><li>Ownership of contract management strategy unclear</li><li>Resourcing of contract management and training inadequate</li><li>Clarity of service area accountability &amp; roles and responsibilities poor</li><li>Contract managers not fully aware of the risks if robust regular contract management with their suppliers and supply chain not undertake</li><li>Inadequate SLA/KPIs/MI identified in tender/contracts together with appropriate escalations /consequences</li><li>Due diligence pre award and ongoing poor</li></ul>	<ul style="list-style-type: none"><li>Third party relationships and contracts not managed appropriately causing:<ul style="list-style-type: none"><li>contract value not realised / obligations not carried out</li><li>Poor performance</li><li>Financial loss / poor value for money</li><li>Legislative requirements not met / regulatory / legal fine or censure</li><li>Reputational impact</li><li>Lack of visibility of supplier performance</li></ul></li></ul>	<ul style="list-style-type: none"><li>Use of framework agreements provides a level of due diligence</li><li>Revised contract management strategy</li><li>Robust guidance on obligations and roles and responsibilities for contract management</li><li>Training to be delivered to new contract managers and new officers in procurement team</li><li>‘Driving value through our supply chain’ corporate service review to be instigated</li><li>IA coverage in audit plans</li><li>Platinum contract performance review (annual checklist)</li></ul>	Aug 20	3	3	9	Assess	4	3	12	
			Risk Control Action								
			Action		Owner	Target Date	Update				
			<ul style="list-style-type: none"><li>Develop Contract Management training/Source training delivery</li></ul>		Business Relationship & Procurement Manager	Complete  Ongoing Sep 21	Training delivered to NCSL based on current guidance. Wider training needs to be reviewed – to be part of service review/strategy action plan development				
			<ul style="list-style-type: none"><li>Deliver training<ul style="list-style-type: none"><li>NCLS officers</li><li>NCC officers</li></ul></li></ul>		Business Relationship & Procurement Manager						
			<ul style="list-style-type: none"><li>Refresh procurement guidance documents<ul style="list-style-type: none"><li>Procurement Strategy</li><li>Contract Procedures</li><li>Other</li></ul></li></ul>		Business Relationship & Procurement Manager	Complete  Sep 21	Cabinet approved Procurement Strategy  CPs & Other docs to be comprehensively reviewed as part of service review/strategy action plan development				
			Driving value through our supply chain’ corporate service review to be instigated		Executive director of corporate and commercial services	Complete  Ongoing	Cross cutting working group established to deliver the approved review Review of key contracts and sharing of best practice				
<b>Comments:</b> Recent limited assurance audit opinions on both NNBL and waste services contract management. Priority resources have been assigned to review these contracts and improve the performance and outcomes achieved.											

Risk 16: The Council's approach to waste and recycling becomes financially, environmentally and contractually unsustainable			Owner: Executive Director Development & City Services				Category:		Risk Direction:	New
				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 become 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</li><li>• Review and redesign of service to ensure that it meets current and future regulatory requirements</li><li>• Staff development programme focussing on procurement, waste strategy and contract management to be designed and delivered</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		Jul 21	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		Nov 21	Anticipated that report will be taken to Cabinet in Nov to agree way forward		
			Waste Strategy to be reviewed to address financial, regulatory and climate challenges		Head of Environment Services		Feb 22			
Comments: Request from CLT in May 2021 for this risk to be added to register.										



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

