

Report to Audit committee
 23 July 2013
Report of Head of internal audit and risk management, LGSS
Subject Review of corporate risk register

Item

11

Purpose

To update members on the results of the review by the council's corporate leadership team of key corporate risks and associated mitigation actions.

Recommendation

To note the changes to the register as a result of the review by the corporate leadership team.

Corporate and service priorities

The report helps to meet the corporate priority Value for money services

Financial implications

None directly

Ward/s: All wards

Cabinet member: Councillor Waters – Deputy leader and resources

Contact officers

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LGSS

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Background documents

None

Report

Background

1. The previous version of the corporate risk register was presented to audit committee in January 2013.
2. In accordance with the council's framework for managing risk, the corporate leadership team (CLT) has reviewed the key risks to achieving the council's priorities and has updated the register.
3. The updated corporate risk register is attached at **annex 1**. Reasons for the main changes from the previous version are summarised in the following section.
4. The small number of changes resulting from the latest review reflects the fundamental review of corporate risks in 2012 to take account of certain policy changes and the financial situation, as previously reported to audit committee.

Changes to the corporate risk register

5. The following shows a brief summary of where changes have been made (all other risks unchanged):
 - CR05 delivery of the corporate plan and other key policies – minor wording change which now refers to the welfare reform act
 - CR17 relationship management with key service delivery partners and the management of contracts – mitigation updated
 - CR23 community right to challenge – likelihood reduced as nationally the number of challenges to date has been lower than anticipated
 - CR24 information security – mitigation updated
 - CR26 – cash receipting system – wording updated and likelihood reduced as the project to replace the current system is progressing well and is on target for a successful completion.
6. The second page of the register, key corporate risks summary, has been updated to reflect the above changes.
7. Risks are shown in 'risk score' order, highest score first.
8. At its meeting on 19 June 2013, CLT asked for the council's risk management processes and corporate risk register to be reviewed as a whole. It was suggested that the LGSS risk model, in place at Cambridgeshire and Northamptonshire county councils, may also be appropriate at Norwich. This will be explored with LGSS and reported back to CLT and members.

Summary

9. Members can take assurance from the fact that the current corporate risk register is the result of continued review by managers and CLT of the key risks that may have an impact on achieving the council's priorities.

Norwich City Council

Key corporate risks

Reviewed by audit committee July 2012

Updated by corporate leadership team October 2012

Reviewed by audit committee November 2012

Approved by cabinet December 2012

Reviewed by audit committee January 2013

Reviewed by corporate leadership team June 2013

Key Corporate Risks Summary (next 2 – 3 years)

18 risks ranked, 4 red risks

		Impact / Consequences				
		Insignificant	Minor	Moderate	Major	Catastrophic
		1	2	3	5	7
Likelihood / Probability	5 Very High				1, 27	
	4 Likely			17a	8, 10	
	3 Possible			19, 25	5, 12, 17, 20, 21, 22, 24	
	2 Unlikely				4, 11, 23, 26	
	1 Rare					

No.	Top Corporate Risks
Very High Likelihood – Major impact	
CR01	Public sector funding
CR27	Income generation
Likely – Major impact	
CR08	Customer demand
CR10	Emergency planning and business continuity

Council Priorities 2012-15**City Council Priorities****1. To make Norwich a safe and clean city****2. To make Norwich a prosperous city****3. To make Norwich a city with decent housing for all****4. To make Norwich a city of character and culture****5. To provide value for money services**


Key Corporate Risks

Likelihood scored on a scale: 1 rare; 2 unlikely; 3 possible; 4 likely; 5 very high

Impact scored on a scale: 1 insignificant; 2 minor; 3 moderate; 5 major; 7 catastrophic

Risk No	Council Priority	Likelihood	Impact	Change	Risk Score	Description	Vulnerability	Trigger	Consequence	Ownership
CR01	All	5	5	↔	25	Public sector funding	<p>A major reduction in public sector funding, including consequences of changes in funding arrangements for other bodies.</p> <p>Impact on balancing the budget – significant change and financial savings required.</p> <p>New policies and regulations place a major financial burden on the Council e.g. RSG and HRA restructuring.</p> <p>Change in direction of government policy.</p>	<p>Further economic decline.</p> <p>Change in national government policy as a result of the economic position.</p> <p>Unable to make saving within the required timescales</p>	<ul style="list-style-type: none"> Erosion of reserves Major financial problems Reputation damage Possible industrial action Changes become “knee jerk” Govt intervention Further savings required Council loses critical mass in key areas Service failures Potential disproportionate impact on the poorest and most vulnerable members of society 	S151 officer
Action/controls and other mitigation							Responsibility for Action		Review Frequency	
Medium Term Financial Strategy incl. reserves policy, financial reporting to CLT & Cabinet, transformation projects regularly monitored, MTFS is regularly reviewed and updated. HRA business plan. Weekly review by CLT of government announcements to assess implications and response required.							CLT and S151 officer		Monthly or more frequently if needed	
CR27	All	5	5	↔	25	Income generation	<p>Impact on balancing the budget – significant change and financial savings required.</p> <p>Under-utilisation of assets.</p> <p>Failure to agree with GNDP partners CIL funding arrangements for investment in core infrastructure required to deliver homes and jobs.</p>	<p>Further economic decline.</p> <p>Unable to make saving within the required timescales.</p> <p>Other triggers: Bethel St Police Station – market value payment. Triennial pensions review.</p>	<ul style="list-style-type: none"> Inability to raise capital receipts Decline in income streams (eg rents from investment properties) – insufficient funds to maintain current service levels Erosion of reserves Major financial problems Reputation damage Govt intervention 	S151 officer

Risk No	Council Priority	Likelihood	Impact	Change	Risk Score	Description	Vulnerability	Trigger	Consequence	Ownership
							CIL (community infrastructure levy) income is below expectations. Collapse in world markets leading to loss of income Low economic growth or recession reduces income	VAT partial exemption. Variable energy prices. Increasing voids due to market and economy factors. Loss of major tenant. GNDP board decision or cabinet decision on CIL investment arrangements.	<ul style="list-style-type: none">• Further savings required• Council loses critical mass in key areas• Service failures• Potential disproportionate impact on the poorest and most vulnerable members of society• Damage/costs across void portfolio• Essential infrastructure to deliver growth in the GNDP area is delayed.	
Action/controls and other mitigation							Responsibility for Action		Review Frequency	
Medium Term Financial Strategy incl. reserves policy, financial reporting to CLT & Cabinet, transformation projects regularly monitored, MTFS is regularly reviewed and updated. HRA business plan. GNDP have an agreed investment plan for the Greater Norwich area and have appointed consultants to advise on the use of CIL to help deliver this programme. Public examination on the soundness of the CIL tariff has been completed and inspectors report due in November 2012.							CLT and S151 officer		Monthly or more frequently if needed	
CR08	All	4	5	↔	20	Customer demand	Customer demand exceeds our capacity to deliver services as they are currently configured. Transfer of demand arising from service delivery changes or budget cuts by other public agencies	Excessive customer demand in key areas, particularly in relation to the need to cut services, or changes to policies eg council tax benefits	<ul style="list-style-type: none">• Unable to cope with demand• Complaints• Reputation damage	Deputy chief executive
Action/controls and other mitigation							Responsibility for Action		Review Frequency	
Proactive research on customer profile, forward planning, eg anticipating future events that will generate higher demand and use of data held to map and channel shift. Data capture, consultation, survey and service planning. Being robust about the role and responsibilities of Norwich City Council							Head of service where relevant and customer contact		Continuous	

Risk No	Council Priority	Likelihood	Impact	Change	Risk Score	Description	Vulnerability	Trigger	Consequence	Ownership
CR10	All	4	5		20	Emergency planning and business continuity	The council delivers a range of complex services to vulnerable elements of the community. Organisations generally are experiencing significant continuity events once every five years on average. The council, businesses and members of the public in the city may also be at risk from the local effects of climate change in the medium to long term.	Occurrence of a significant event: <ul style="list-style-type: none"> • ICT failure • Contractor collapse • Severe weather events – storms, heatwaves, strong winds • Flooding • Sea level rise • Fuel shortages • Communications failure • Pandemic 	<ul style="list-style-type: none"> • Service disruption and inability to deliver services • Disruption of the delivery of goods and services to the council • Increased requests for council resources and services • Health and safety impact on staff and vulnerable residents • Damage to council property and impact on tenants • Reputation damage • Years to recover 	Deputy chief executive and executive head of business relationship management
Action/controls and other mitigation							Responsibility for Action		Review Frequency	
<p>The council is a member of the Norfolk Resilience Forum, which has produced a Norfolk Community Risk Register</p> <p>Business continuity team with access to resources; action plans have been used to deal with actual total City Hall IT failure; alternative site for customer contact team; disaster recovery plan and the use of Blackberries for communications.</p> <p>The council has a major emergency management strategy and emergency planning room established at City Hall. Approach has also been used to test business continuity in the event of the main works contractor changing.</p> <p>Flu pandemic plan.</p> <p>The Norfolk Climate Change Partnership has produced a climate change risk assessment for Norfolk local authorities.</p> <p>Adaptations to protect the council from the local effects of climate change and address the causes are covered by corporate strategies such as the environmental strategy and sustainable community strategy, together with service plans.</p>							<p>Public protection manager co-ordinates general business and the council's role in emergency planning. Service improvement manager co-ordinates the IT list of key officers. Heads of service responsible for works contracts and ensuring resilience is built into service plans.</p>		<p>All documents have review dates after valuable lessons learned. Business continuity plans for works contracts reviewed as necessary.</p>	

Risk No	Council Priority	Likelihood	Impact	Change	Risk Score	Description	Vulnerability	Trigger	Consequence	Ownership
CR05	All	3	5	↔	15	Delivery of the corporate plan and key supporting policies and strategies within the council's strategic framework, including environmental strategy and financial inclusion strategy.	The council has a clear set of corporate priorities within its corporate plan. Within the council's wider strategic framework, there are a number of key corporate strategies and policies which must be delivered across the organisation to realise the council's priorities e.g. environmental strategy, financial inclusion strategy etc The welfare reform act and other key pieces of legislation are changing the framework for local government and put new requirements on the council that must be met in a number of different areas. When this is combined with the significant savings the council will need to make to meet the government funding reductions, there is a risk that these changes will reduce the capacity of the council to deliver on its key corporate priorities.	Corporate priorities are not on target to be delivered.	<ul style="list-style-type: none"> • Key priorities for the City are not delivered • Projects halted or delayed • Adverse public opinion • Projects / work completed to a lower quality • Negative impact on outcomes for customers • Negative performance ratings for the council • Continual over-stretching of capacity • Inconsistent approach taken across council • Full benefits not realised • Benefits of cross working not gained • Lack of corporate working • Staff confusion over policies and process • Failure to take the opportunity to make the lives of Norwich citizens better 	Executive head of strategy, people and democracy
Action/controls and other mitigation							Responsibility for Action		Review Frequency	
Regular review of corporate plan, medium term financial strategy and other key policies and strategies, effective performance and programme management, corporate planning and service planning aligned with budget setting to ensure resources are in place to deliver priorities. Effective preparation for changes in legislation.							CLT and heads of service		Continuous process	
CR12	All	3	5	↔	15	ICT strategy	The council has transferred its ICT service to LGSS and it will rely on LGSS to develop an ICT strategy for the council.	ICT strategy fails to support the organisation moving forward and the lean blueprint for a new council.	<ul style="list-style-type: none"> • Incoherent approach to ICT systems • Systems not customer friendly • Systems are not integrated with one and other 	Executive head of business relationship management

Risk No	Council Priority	Likelihood	Impact	Change	Risk Score	Description	Vulnerability	Trigger	Consequence	Ownership
									<ul style="list-style-type: none"> Drain on resources as staff work around the systems Lack of accuracy in key data Data are unreliable Key information not trusted Hinders management and service improvements Failure to deliver council priorities 	
Action/controls and other mitigation							Responsibility for Action		Review Frequency	
NCC has developed an ICT strategic direction document detailing the key areas where ICT is required to support business objectives and change. Management of the LGSS relationship will seek to ensure that NCC requirements are delivered.							Executive head of business relationship management for governance arrangements in the contract and chairing corporate information assurance group		Bi-annual review of overall governance arrangements	
CR17	5	3	5	↔	15	Relationship management with key service delivery partners and the management of contracts.	<p>The council has a number of key partnerships with LGSS, NPS Norwich, and NP Law. There is also a highways agency agreement with Norfolk County Council. This approach to service delivery requires a different managerial approach by the city council.</p> <p>The council also has a number of key contracts – eg with NORSE, BIFFA, and Anglia Windows Ltd, – which require strong, consistent procurement and client management.</p>	<p>Partnerships not managed effectively and key service outcomes not achieved.</p> <p>Contracts not managed effectively, and key service outcomes not achieved.</p>	<ul style="list-style-type: none"> The council doesn't get value for money Benefits of partner and contract arrangements not realised Constant negotiation around the service delivery agreement Specification not adhered to Services not provided at an acceptable level Customer and staff complaints 	Deputy chief executive and executive head of business relationship management

Risk No	Council Priority	Likelihood	Impact	Change	Risk Score	Description	Vulnerability	Trigger	Consequence	Ownership
	Action/controls and other mitigation						Responsibility for Action		Review Frequency	
	New governance structure is in place to manage the individual partnership agreements (eg NPS Norwich Board, LGSS liaison group, NP Law Board, all major contracts have strategic and operational governance arrangements with officer and member representation.						Business management group.		Monthly and quarterly reviews undertaken.	
	In response to the council operating model training requirements are being reviewed and staffing structures refreshed to reflect this change. Contract management training has been completed for staff delivering environmental works contracts.									
	A contract and business relationship management toolkit has been developed and has been deployed. This aims to create consistency of management of both financial and performance objectives and monitoring and management of all economic, social and environmental issues associated with the service.									
April 2013 Scrutiny meeting reviewed the LGSS service provision one year on after transfer.										
CR20	All	3	5	↔	15	Level of reserves	The council has a legal duty to ensure it has a prudent level of reserves to conduct its business. Government policy. Economic climate	Reserves fall below acceptable levels	<ul style="list-style-type: none">Inadequate levels of reserves publicly reported by external auditorsGovernment interventionImpact on reputation of the council	S151 officer
	Action/controls and other mitigation						Responsibility for Action		Review Frequency	
	Medium term financial strategy. HRA Business Plan. Planning and delivery of transformation (savings) programme. Contract and business relationship management to identify and respond to business delivery risks. Budget development, in-year monitoring and control						Chief finance officer, CLT and business management group		Quarterly	
CR21	1	3	5	↔	15	Safeguarding children, vulnerable adults and equalities duties.	Safeguarding and equalities duties and responsibilities not embedded throughout the council and its contractors/commissioned services/partners. Short term works contracts mean that there is an ongoing requirement to ensure contractors comply with the	Critical incident	<ul style="list-style-type: none">Vulnerable adults and children at greater risk of exclusion or harmIndividuals from a community of identity dealt with inappropriately and at risk of exclusionRisk of judicial review	Deputy chief executive
								Change in contractor/ commissioned service/partner.		

Risk No	Council Priority	Likelihood	Impact	Change	Risk Score	Description	Vulnerability	Trigger	Consequence	Ownership
							council's safeguarding children and adults duties and those relating to equalities. Change in council service delivery model with an increase in the number of partnership arrangements will require new arrangements for the delivery of safeguarding and equalities duties. Impact of cuts on care services and benefit funding.	Change in contractor/ commissioned service/partner Reduced service provision	on accessibility of services	
Action/controls and other mitigation							Responsibility for Action		Review Frequency	
Safeguarding children policy and procedures in place and reviewed annually through safeguarding group. Safeguarding compliance self assessment improvement plan being implemented Safeguarding vulnerable adult policy and procedures being prepared. Safeguarding duties included in new contracts and programme to ensure duties are embedded is in progress with new contractors, and joint training/ awareness sessions have been held. Equalities duties is overseen by corporate equalities group. A contract and business relationship management toolkit has been developed and is being deployed. This aims to create consistency of management of both financial and performance objectives and monitoring and management of all economic, social and environmental issues associated with the service and particularly in relation to safeguarding							Safeguarding children - Head of local neighbourhood services and all contract managers. Safeguarding vulnerable adults - Tenancy support manager and all contract managers. Equalities – Head of policy and programme management		Quarterly	
CR22	All	3	5	↔	15	Industrial action	Changes to pension regulations and pay restraint and changes to terms and conditions could lead to industrial action by employees	National negotiating framework - failure to agree. Ballot of union members. Implementation of changes to the LGPS. Implementation of government interventions on pay	<ul style="list-style-type: none">Loss of key servicesPublic safetyLoss of incomeReputation	Executive head of strategy, people and democracy

Risk No	Council Priority	Likelihood	Impact	Change	Risk Score	Description	Vulnerability	Trigger	Consequence	Ownership
	Action/controls and other mitigation						Responsibility for Action		Review Frequency	
	2 stages – managing the threat of industrial action and responding to industrial action Identify and agree with UNISON exemptions from strike action Identify and implement business continuity/contingency plans to maintain essential services and ensure statutory duties are met CLT agree and implement strategy for response to strike action ie assessing the scale of the action, communications, response depending on nature of the action, wider industrial relations implications, deductions from pay etc National and regional guidance Statutory immunities – Trade Union Labour Relations (Consolidation) Act						Head of HR and learning		Monitor and review in line with national consultation and negotiations	
CR24	5	3	5	↔	15	Information security	Sensitive and/or personal data is sent to the incorrect recipient or not kept securely, or is lost.	Data is emailed to insecure email addresses. Lap top or memory stick containing data is lost or stolen. Information is sent to incorrect addresses. Hard copy data is lost or stolen.	<ul style="list-style-type: none"> Fine up to £0.5 million Reputational risk 	Executive head of business relationship management
	Action/controls and other mitigation						Responsibility for Action		Review Frequency	
	Regularly remind all managers and employees of their responsibilities for the use of and security of data. Avoid using mobile devices to store or process sensitive or personal data. Encrypt lap tops and data sticks when they are used to store or process sensitive or personal data. Proper disposal of confidential waste. Updated IT User Security policy issued June 2013 to all staff and other people who access the council's systems (eg partners, contractors etc.).						Managers to remind all employees of their responsibilities All employees regularly required to read and sign up to the relevant policies All new starters required to read and sign up to the relevant policies CLT to consider mandatory data protection training before access to any systems is granted (recommendation from Civica audit)			
CR17 a	5	4	3	↔	12	Failure of major contractor & legal challenge following an unsuccessful	The council has a number of key contractors who may be vulnerable to market and economy factors. In addition the number of legal challenges (and	Key contractor goes into administration or an injunction is issued preventing	<ul style="list-style-type: none"> Customer and staff complaints Services not delivered Contingency plans have to be invoked 	Executive head of business relationship management

Risk No	Council Priority	Likelihood	Impact	Change	Risk Score	Description	Vulnerability	Trigger	Consequence	Ownership
						tender bid	therefore injunctions preventing a contract award) is increasing due to the financial pressures and reducing workload	the award of a new contract	<ul style="list-style-type: none">Cost and time to retender contractCost and time to defend legal challengeAdditional unforeseen costs impact delivery of balanced outturn and reserve levels	
Action/controls and other mitigation							Responsibility for Action		Review Frequency	
<p>Monitor major contractors for warning signs and make any necessary contingency plans. Recently put into practice and contingency plans tested.</p> <p>Ensure a robust procurement process is followed in accordance with the appropriate procurement regulations, NCC processes and best practice. NPS JV to be extended to include works division. This arrangement will enable the JV to carry outwork that was previously contracted to private sector. This approach is in line with the Councils operating model. This will provide enhanced security over the supplier and increased direct control by the council.</p> <p>Contingency budget and allowance for failures within the calculation of prudent minimum balance of reserves</p> <p>More use of shared services reduces size and scope of contracts with private sector providers (eg ICT)</p>							<p>Head of service and contract manager have responsibility for business continuity planning</p> <p>Procedural matters following a failure of a major contractor will be undertaken by Executive head of business relationship management.</p> <p>Head of service and executive head of business relationship management to ensure procurement processes followed</p>		Quarterly	
CR04	3	2	5	↔	10	Norwich and Homes & Communities Agency Strategic Partnership (NAHCASP) Three elements: 1)Development of land at Bowthorpe for mixed tenure (amber) 2) Other affordable housing and	Reputation Change of rules by the government – tighter deadline for bidding for affordable housing grant Bowthorpe - need for master plan and detailed plan for phase one. Outline application submitted April 2012. Need to establish a future investment programme using funds from Bowthorpe development	Material breach of contract Deadlines missed Funding for some projects may not be obtained Failure to obtain planning approval Failure to establish investment programme	<ul style="list-style-type: none">Projects halted or delayedAdverse public opinionIncrease in local unemploymentFunding may have to be returnedCore infrastructure and affordable homes may not be delivered	Deputy chief executive

Risk No	Council Priority	Likelihood	Impact	Change	Risk Score	Description	Vulnerability	Trigger	Consequence	Ownership
						regeneration schemes (amber) 3. South city centre masterplan work (green)	Need to establish deliverable development proposals and funding. Need to identify partner for delivery of affordable housing and care home provision.			
Action/controls and other mitigation							Responsibility for Action		Review Frequency	
Contract. Strategic Board includes Members and HCA. Officer Implementation Board. Annual Business Plan. Project managers for individual projects. Regular financial and budget reports. Two audit reports gave good assurance on controls. New outline planning application submitted in April 2012 to provide development framework for phased delivery of the site. Consultants appointed for south city centre masterplan work. Council to take on role of development partner for affordable housing in phase one and care home development partner has been agreed.							Head of city development		Monthly highlight reports	
CR11	3	2	5	↔	10	Delivery of Joint Core Strategy (JCS)	The council, through the Greater Norwich Development Partnership, is seeking to promote delivery of the JCS. If delivered, JCS will see more than 30,000 homes built in the greater Norwich area, and 35,000+ jobs created over next 15 years. There has been a successful Legal challenge to the JCS. This will require a review of the development strategy for Broadland. The city council can adopt the strategy and this will enable work to continue on the identification of potential development sites and development management policies.	Failure of the GNDP board to agree a revised development strategy for Broadland.	<ul style="list-style-type: none"> Reputation damage Significant likelihood that the overall development strategy for the Greater Norwich area will not be delivered. 	Deputy chief executive

Risk No	Council Priority	Likelihood	Impact	Change	Risk Score	Description	Vulnerability	Trigger	Consequence	Ownership
	Action/controls and other mitigation						Responsibility for Action		Review Frequency	
	Ensuring that strategies being prepared with GNDP colleagues are as robust as possible and firmly grounded in reliable evidence. Inter-authority working based on consensus decision-making ensures all parties are in agreement with the proposed policy framework. All policy work is supported by comprehensive evidence in accordance with government guidelines.						Head of planning		Quarterly – business head of service group	
CR23	All	2 (was 3)	5	↓	10 (was 15)	Community right to challenge	The Localism Act includes the community right to challenge. This means that community organisations (along with private contractors if they choose) can challenge the council on the delivery of a service and in doing so trigger a procurement process. This could lead to a fragmentation of services and leave the council with fixed overheads that would need to be paid for by the remaining services.	A successful challenge or series of challenges leads to a fragmentation of services.	Services become fragmented and remaining overheads cannot be mitigated and overall service cost increases.	Executive head of business relationship management
	Action/controls and other mitigation						Responsibility for Action		Review Frequency	
	Keep services under review to ensure they are delivering value for money. If a challenge is successful ensure that the procurement process takes in to account all elements of the service including overheads. Ensure any contracts as a result of challenges are flexible and allow the council to manage budgets.						Heads of service			
CR26	All	2 (was 3)	5	↓	10 (was 15)	Cash receipting system	The council needs to change its existing cash receipting system to maintain compliance with Payment Card Industry standards. The existing supplier is currently finalising a hosted system but there was a risk that it would not be able to meet the deadline	The hosted system solution is not available on time or does not work and the council is unable to take card payments. The supplier is unable to move the council to the new system by	<ul style="list-style-type: none"> Cash flow if the council is unable to take card payments (currently nearly £300k per week) Cost of alternative solution Reputation Fines 	Executive head of business relationship management

Risk No	Council Priority	Likelihood	Impact	Change	Risk Score	Description	Vulnerability	Trigger	Consequence	Ownership
								the deadline		
	Action/controls and other mitigation						Responsibility for Action		Review Frequency	
	In view of the risk to the council, other solutions were explored in conjunction with LGSS. A new system has been procured and a project team with members from NCC, LGSS and the new supplier is working towards implementation by the beginning of August 2013.						CLT and executive head of business relationship management		Monthly	
CR19	5	3	3	↔	9	Fraud and corruption	Poor internal controls lead to fraudulent acts against the council, resulting in losses. Bribery Act 2010 came into force 1 July 2011 – lack of guidance or policies	Failure in internal control. Discovery of fraudulent acts. Allegations received. Member of staff or councillor breaks the law. Council fails to prevent bribery	<ul style="list-style-type: none"> • Loss of income or assets • Adverse public opinion • Effect on use of resources • Increased costs of external audit • Cost of investigation and rectifying weaknesses • Prison 	S151 officer
	Action/controls and other mitigation						Responsibility for Action		Review Frequency	
	Internal audit, fraud and corruption policy, Payment Card Industry security assessment to protect card payments, National Fraud Initiative, fraud team, whistleblowing policy and prosecution policy. Review and update as necessary policies and procedures. Assess risk of bribery, train staff and monitor and review procedures.						LGSS head of internal audit, risk and insurance		Quarterly	
CR25	3	3	3	↔	9	Housing Investment Strategy	As part of the reform of the HRA the council has taken on a substantial debt to replace the former negative housing subsidy system. This debt will be repaid over a period not exceeding 30 years. In addition to debt repayments the council has adopted a new standard for investment in the housing stock and a commitment to fund a new build programme. Should the cost of works increase and/or the level of income reduce, then it may be necessary to review the housing investment strategy.	<p>Reduction in rental income (arising from a high level of council house sales, increasing debt or other factors).</p> <p>Significant increase in the cost of delivering improvement works.</p>	<ul style="list-style-type: none"> • Failure to deliver the Norwich Standard within the expected timescale • Lack of resources to support a new build programme. • Increased tenant dissatisfaction • Reduced new build programme. 	Deputy chief executive and S151 officer.

Risk No	Council Priority	Likelihood	Impact	Change	Risk Score	Description	Vulnerability	Trigger	Consequence	Ownership
							In addition, below inflation/rpi increases in rents will impact on income.	Annual rent setting process		
Action/controls and other mitigation							Responsibility for Action		Review Frequency	
Regular review of HRA business plan and housing investment plan to reflect financial position of the HRA. The main control will be the timescale for delivering the Norwich standard to all properties together with the delivery of any agreed new build programme.							Cabinet and CLT		Quarterly review of HRA BP by CLT. Annually as part of the budget setting process	