Cotswold District Council Strategic Risk Register Reviewed November 2024 Next Review: December 2024

								Initial	Risk		Previous Resi Risk Score		nt Residual k Score	al risk						
ID	Risk Title	Description of risk / opportunity	Corporate Priority	Risk Owner	Responsible Officer	Date reviewed	Impact category	Impact score	category Likelihood score	Existing Control, Mitigation or Contingency	Impact category Likelihood category	Score Impact category Likelihood	category	Change in residu	Follow on Action (if required)	Action Owners	Target delivery date	Risk Acceptance Level	Status: Open, Hold, or Closed	
Inter	al Risks (IR)					<u>'</u>		,								'	'	<u>'</u>		
CDC IR 1	Financial Sustainability	Government Funding declines putting financial sustainability at risk. Council cannot deliver services within current cost configuration or financial envelope. Members and Officers are not cogniscant of the financial challenge or do not engage adequately. CTWG does not deliver cost reduction or savings required to close the budget gap identified in the MTFS. Pay Award/Inflation assumptions in the MTFS are below actual impact MTFS already assumes Council Tax increases. Peer Challenge and subsequent review. Poor decision making on Council services or priorities. Decisions taken in isolation and do not form part of a wider strategy. Council does not have adequate reserves to mitigate financial risks. Unanticipated demand on services increasing financial pressure. Impact of cost of living crisis. Savings targets.	delivering good services	\$151	\$151	1/2/2024	Major	4 Probable	4	General Fund Reserves are adequate. 2024/25 Budget updated to include known cost pressures. Budget monitoring in place throughout the year. Budget settling for 52/56 to identify additional opportunities and pressures. CTWG identify and agree scope of additional cost reductions/efficiencies. Local Government pay award for 2024/25 agreed at £1,290 or 2.50% (whichever is the greater).	Modera	77 Moderate	Probable	o	Quarterly Financial Reports to Cabinet and Overview & Scrutiny Committee. 2025/26 Budget Strategy and MTFS Update (November 2024) set out approach to achieving a balanced budget taking into account Publica Review Phase 1 additional costs (£416k). Identification review and challenge of 2025/26 budget pressures through 0.3. Review of balances and reserves stratgy in Q3. Further consideration of options particularly in areas of Waste, Leisure, Homelessness and Asset Management with a view to bridging the financial gap identifies within the MTFS. In addition, more member training to be considered to increase profile of budgetary challenges. Engagement with Cabinet and individual portfolio holders on options/straegic choices to close the budget gap identified in the MTFS final Budget presented to Cabinet and Council in February 2025. Publica Review Phase 2 - Financial modeling of service options commenced Q3 and likely to exert significant influence on ability to balance budget in 2025/26.	S151	Ongoing	Risk Reduction	Open	
CDC IR 2	GDPR / Information Management	If the council is not compliant with the General Data Protection and does not have robust processes in place for Information Management then there is a risk of financial penalties, reputational damage and impact on resources	delivering good services	Director of Governance	Business Manager - ICT	1/2/2024	Major	4 Probable	4	Policies and procedures in place for Data Protection Compliance Data Protection Officer and team in place. ICT systems compliant with Data Protection with PSN accreditation / cyber essentials Mandatory training for all staffloata Protection Privacy notices in place. Data sharing agreements in place Data breach processes in place	Major Possible	JO POP TO STATE OF THE STATE OF	Possible 12	0	All emails received from at risk location are quarantined and inspected by ICT staff before being released. New cyber security software installed. See also risk P5 on cyber security. 98% of staff now trained in cyber awareness and final 2% being reviewed. PSN renewal underway, and paperwork to be submitted this month. New data protection training is currently being rolled out to all staff. This is a mandatory course. We are in the process of interviewing for a new Governance Officer.	Business Manager - ICT	Ongoing March 2025	Risk Reduction	Open	
CDC IR 3	Health & Safety	If the council and its contractors / partners are not compliant with the Health & Safety at Work Act, it is at risk of a serious Health & Safety incident / accident leading to financial penalties, reputational damage and risk to services.	delivering good services		Ass Director, Business Services	1/2/2024	Major	Probable	4	Health & Safety business partner in place to monitor compliance for Publica, with H&S Board and audit / inspection process. New H&S policy in place for Publica. Ublico have specialist H&S Officers and hold ISO45001, the highest level of H&S compliance. Services delivered by Council and Publica are low risk, highest risk is services contracted to Ublico where H&S is paramount.	Major Remote	Major	Remote	o	Health & Safety Board in place to monitor compliance and report back to the Council. Schedule of H&S internal compliance audits by service area completed by Business Lead for H&S, this is resulting in increased focus and compliance	Publica AD	Ongoing	Risk Sharing	Open	
CDC IR 4	Legislative Compliance	If the Council and its contractors / partners is not compliant with relevant legislation, it is at risk of not meeting its statutory duty, reputational damage and financial impact	delivering good services	Director of Governance	Head of Legal Services	1/2/2024	Moderate	3 Possible	3	Individual ADs and BMs responsible for Legal compliance within their respective areas with an annual declaration in place to monitor compliance. Audit process in place to check compliance. Service areas receive updates on legislation for their service areas. Review of legal services being completed.	Minor Possible	Minor	Possible 9	o	Work ongoing to ensure we remain compliant with current legislation and future legislation. Annual Manager declaration completed with no concerns raised. Legislation which is changing this year, such as the procurement regs are captured in the AGS Action Plan. All formal reports include legal implications are completed by the Head of Legal Services. The Chief Executive Officer has been appointed as SIRO. Constitution regularly reviewed and updated. External assessments such as peer review, PAS are in place.	Head of Legal Services	Ongoing	Risk Acceptance & Retention	Open	
CDC IR 5	Shareholder Review of Publica	Phase 1 Transition of Services (will be removed once fully complete) Human Engine report (November 2023) and Local Partnership Report (March 2024) approved by all shareholder Council with the majority of services transferring from Publica to the Councils. Detailed Transition Plan (July 2024) approved which set out the services transferring under Phase 1 by November 2024 and the estimated additional cost to each Council. Phase 2 Transition of Service Shareholder Councils have committeed in principle to transfering services by mid-2025. If there is not the political appetite or options are unaffordable there is a risk to service delivery, retention and recruitment of staff. If detailed options are not developed, costed and risk assessed to enable informed decisions to be made, there is a risk that in-sourcing these service delivery, cuts to service, loss of key resources and reputational damage. If detailed costings are not undertaken, there is a risk that in-sourcing the services could increase the cost of delivery and not achieve savings / effciencies.	delivering good services	CEO	CEO	1/2/2024	Moderate	Possible	3	Phase 1 transition or Services (will be removed once fully complete) Human Engine report (November 2023) and Local Partnership Report (March 2024) approved by all shareholder Council with the majority of services transferring from Publica to the Councils. Detailed Transition Plan (July 2024) approved which set out the services transferring under Phase 1 by November 2024 and the estimated additional cost to each Council. Phase 2 Transition of Service Shareholder Councils have committeed in principle to transfering services by mid-2025. If there is not the political appetite or options are unaffordable there is a risk to service delivery, retention and recruitment of staff. If detailed costings are not undertaken, there is a risk that in	Moderate	72 Moderate	Probable	0	The phase 1 TUPE transfer of services has now been completed with employees successfully transferring over to CDC on 1/11/24. Work is ongoing on payroll and business world up to 20/11 and external recruitment to vacant roles in new CDC structures. Review of phase 1 is being undertaken and reported to O&S in January 2025. Work is now commencing on reviewing potential services for transfer under phase 2. The Council is committed to the transition of services under phase 2, however detailed work is being undertaken to understand options, costings and timelines to enable informed decision to be made. Separate Strategic Risk Register in place for the Transition.	CEO		Risk Reduction	Open	
CDC IR 6	Business Continuity Plans	Failure to have effective, robust and tested business continuity plans in place in the event of a significant event such as a cyber attack may result in service failure, impact on the community, reputaional risk and financial implications	delivering good services		Business Manager - Governance	1/2/2024	Major	Probable	4	BCPs in place for all service areas which are reviewed annually. BCP test completed in November 2022 and action plan completed.	Moderate Possible	Moderate	Possible	0	Schedule now in place for BCP review. ICT BCP test completed with internal audit to rebuild critical IT functionality outside of server. Member of Emergency Planning Team now completed formal BCP training. Currently reviewing BIA and BCP form to ensure it is robust. Testing to be completed by Service Managers. BCPs being reviewed following transfer of services Work being scheduled in 25/26 to develop BCPs and undertake deeper dive into each service area.	BM - Governance	Complete March 25	Risk Reduction	Open	
CDC IR 7	Procurement	Without clear and robust procurement procedures, Publica and the Council will not benefit from the most economically advantageous procurement opportunities and may not meets its obligations under the Public Sector Procurement Regulations.	delivering good services	S151	Business Partner Procurement	1/2/2024	Moderate	Possible	3	Revised (2023) Commissioning and Procurement Strategy in place and approved by Cabinet. Contract value reduced from £100k to £50k to be brought to the Commissioning & Procurement Board. Contracts register in place and monitored /managed by procurement team.		Moderate	Remote	0	Training has been rolled out to all Managers on the new Commissioning & Procurement Strategy. Briefing note circulated to all Business Managers and Assistant Directors. AGS includes requirement for compliance to new Procurement Regs.	BP - Procurement	Ongoing	Risk Acceptance & Retention	Open	

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CDC IR 9	Staff Resources Uninsurable Risk ernal Risks (ER)	If the Council and /or its delivery partners cannot recruit or retain good staff, it is at risk of not being able to deliver its statutory services to the residents of Cotswold District Council leading to service failure, reputational risk. If the Council and/or its delivery partners cannot recruit or retain good staff, there is an increased reliance on agency staff at a significantly higher cost than budgeted for and weakens the Council's ability to maintain a balanced budget/MTFS. There are a number of risks which are not insurable including, but not limited to reputation, regulatory, trade secret, political, pandemic and civil emergency. This is an unknown / unacceptable risk of loss or a situation.	delivering good services delivering good services		Ass Director, Organisational Effectiveness	1/2/2024	2	Possible Possible	3 3	Recruitment team in place. Benefits package Branding IIP Controls in place to manage business critical risks and unknown risks such as pandemic / civil emergencies to help manage impact should these occur. Contingent liabilities, where required, are accounted for and disclosed.	note	Major Moderate Analysis Moderate Demonstra	12	3	Monitoring impact on reruitment & retention throughout the transition of services. External recruitment is underway to minimise reliance on agency staff. Risk increased to reflect potential impact on capacity post transition of services around communications, planning and directors team. Consdieration of Insurance Risk earmarked reserve to mitigate any underlying uninsurable costs where appropriate.	CEO 5151	Ongoing	Risk Reduction Risk Acceptance & Retention	Open	1
CDC ER 1	Cyber Attack / Data Breach / Data Loss	If the ICT network is not adequately protected then it is susceptible to a Cyber - Security Attack leading to loss of systems and data, significant downtime, reputational damage and impact on service delivery and resources If staff are not trained in phishing, this could lead to a successful cyber attack, loss of income through financial payments being made.	delivering good services		Business Manager - ICT	1/2/2024	Extreme	Probable	annor 4	Blocking of USB and other devices. PSN compliance. Revised policies. Staff awareness training. Business Continuity Plan in place, reviewed and tested. Enhanced encryption software and other specialist cyber tools. Investment in cyber training for the ICT Team and specialist officer/s in post. Cyber Essentials re- accreditation submitted. Ongoing network internal & External Penetration checks. Continual Password Audits across our network to evaluate weak password. Detailed review of Business Continuity & Disaster Recovery Plans in light of recent cyber attack on neighbouring council.	Major Probable	Major Managar Managar	12	-4	98% of staff now trained in cyber awareness and final 2% being reviewed, this will be followed by Phishing emails to test understanding and awareness following the training. Ongoing investment in cyber team with dedicated team now in place. Regular review of User Privileges and Information Asset Register. Cyber updates being presented to Council Audit & Governance committees, Publica Audit & Risk Committee (ARAC) and Governance Meetings. Preparation underway to submit latest PSN submission. Risk was increased to reflect recent cyber attack at Tewkesbury Council. ICT team worked closely with Tewkesbury on the response and recovery and are taking any learning back to our systems. Risk has since been lowered.	BM - ICT	Ongoing	Risk Reduction	Open	
CDC ER 2	Global Pandemic	If there was another global pandemic, then there is a risk to the delivery of council services due to lack of resource availability, impacting on costs and reputation	delivering good services	CEO	CEO	1/2/2024	Moderate	9 Possible	appress .	New risk to replace Covid specific risks, as Covid is now BAU. Lessons learnt from previous pandemic, Council and partners 9 are now setup to work remotely and able to continue to 9 deliver services in the midst of a pandemic. There is an 9 effective framework in place with LRF partners.		Moderate Moderate	9	0	Watching brief should a further pandemic be predicted	CEO	Hold	Risk Acceptance & Retention	Hold	
CDC ER3	Fraud & Corruption Risk	If the Council does not have controls, checks and measures in place when commissioning and procuring goods, works and services, there is a risk of fraud and / or corruption which may impact on cost, reputation, and services.	delivering good services	5151	Head of CFEU	1/2/2024	Major	4 Probable	P00000	Counter Fraud and Enforcement Unit (CFEU) in place to manage Fraud and Corruption and ensure that the Council and its employees understand the risks and have controls, checks and measures in place to mitigate this activity. CFEU report to the Council's Audit and Governance Committee. Employees receive regular training. CFEU test controls to ensure fit for purpose	Moderate Possible	Moderate Moderate	9	0	CFEU currently developing service risk registers for fraud to further improve awareness and controls. Any changes to processes / controls will be monitored / managed for any services which may transition from Publica to direct Council delivery.	Head of CFEU	Ongoing	Risk Reduction	Open	

Strategic Risks (SR)																			
CDC SR 1	Major Civil Emergency	District Councils are category 1 responders and have duties under the Civil Protection act, including providing rest centres for the Public during a Civil Emergency, providing response staff and any other dutiesand having plans in place to manage specific risks. If staff are unwilling to come forward and volunteer to respond to emergencies and with the running of a rest centre, there is a risk that the Council will be unable to fulfil its duty. If the Council is unable to provide a sustained response to a major civil emergency, the Council would be failing in fulfilling its statutory duty to assist and care for those affected.	delivering good services	CEO	CEO	1/2/2024	Major 4	Possible	3 1	Emergency planning team in place. Emergency Planning Process in place, with defined roles and responsibilities. Staff trained in their roles. 24/7 callout in place. Ongoing work with the Local Resilience Forum.		Major Possible	12	CDC Coordination Team and Rest Centres teams now in place, which is then supported by wider shared resource across Publica. Refresh Training setup for Coordination Team, Rest Centre Team and Duty Officers and Managers. All documentation being updated and transferred to 365. Plans tested during recent floods when Tactical Coordinating Group (TCG) and Strategic Coordinating Group (SCG) stood up. Following the transition of services, a proposal has been approved by Senior Management Team to move to a locality based arrangement for 365 on call, with remuneration from 1/04/25. Work is now commencing on recruiting to these teams and then training will be delivered. Currently there has been good interest from both CDC employees and Publica employees to be part of the CDC on call arrangements.	BM - Governance	March 2025	Risk Reduction	Open	-
CDC SR2	Climate Emergency	The Council has made a commitment to achieve countywide carbon neutrality as well a carbon neutrality for the Council's own services. Failure to achieve these targets could result in the Council not meetings its commitments, as well as risk in terms of cost of delivery if the Government does not provide funding for delivery of carbon targets	responding to the climate emergency		Assistant Director - Planning & Sustainability	1/2/2024	Moderate	s Probable	4 1	Desire of Council to become carbon neutral, however affordability and government funding to achieve this may not be in line with ambitions	moderate possible	moderate possible	ā	Focussed delivery of key projects will be embedded in refreshed Service Delivery Plans. To achieve the targets may require significant further investment. Deep dive into Climate Action undertaken at Project Portfolio Board.	Head Climate	Ongoing	Risk Reduction	Open	
CDC SR3	Local Plan /Housing	The council's adopted Local Plan (2011-31) identified a requirement for 8,400 additional homes over the 20-year plan. The relevant policy in the Local Plan (Policy DS1) was reviewed in Sept 2023 by Full Council with an expectation that circa 10,000 new homes would be delivered between 2011-31. Since then, the national government has consulted on a proposal to, amongst other things, increase the number of homes needed in the district from 50t to 979 homes a year. If this proposal is brought into force, there is a risk that applicants and agents will challenge the Council's position on housing requirements and housing land supply when applying for planning permission for new homes through an appeal to a refused planning application.	delivering housing		Assistant Director - Planning & Sustainability	1/2/2024	Moderate	Possible	3	Local Plan policy reviewed in Sept 2023. Local housing needs of the District have not significantly changed. A further review of the relevant Local Plan policy will need to be undertaken if the government's consultation proposals are brought into force.	derate	Moderate Possible	9	Further review of requirements once NPPF consultation response is published by the government.	Strategic Housing Manager	Ongoing	Risk Reduction	Open	-
Part	Partnership Risks (PR)																		
CDC PR 1	Partnership deliverables (Ubico waste provider)	If the 'Waste' contractor does not meet their obligations under key contracts then it could lead to a fall in service standards, reduced customer service, a failure to meet legal requirements or an increase in costs to the Council and reputational impact	delivering good services		Business Manager - Environmental Services	1/2/2024	Major 4	Possible	3 1	CDC is a shareholder of Ubico, with significant control and influence over the company ensuring ongoing financial viability and affordability for the Council. Contract Management in place to ensure Ubico deliver the service in-line with agreed specification and standards. Performance reports presented to Council. Engagement with Publica through operational and strategic meeetings (monitoring, CTWG)	Moderate	Moderate possible	9	O Council and Publica continue to monitor and manage Ubico Contract.	BM - Environmental Services	Ongoing	Risk Reduction	Open	-
CDC PR2	Failure of Leisure provider and partership deliverables (Freedom Leisure)	If the Leisure Providers does not meet their obligations under the leisure contract or face financial difficulties in the future, there is a risk to the Council in the delivery of leisure services, resulting in increased costs, and reputational damage.	supporting communities		Business Manager - Leisure & Communities	1/2/2024	Major 4	Probable	4 1	Contract monitoring and management in place. 16 Monitoring of service offer to drive income	Moderate possible	Moderate possible	9	O Council and Publica continue to monitor and manage Leisure Contract.	CEO	Ongoing	Risk Reduction	Open	
CDC PR 3	Partnership Deliverables (Publica)	If Publica do not deliver the Future Publica Savings, this will add additional financial pressure on the Council, also if delivered as a cutting exercise, it could impact on service delivery. If Publica are unable to recruit/retain suitably qualified staff - impact on quality of services delivered, financial impact and reputation Services are not able to adequately discharge their (legal) obligations leading to failure - this may not be reported through the quarterly performance reports	delivering good services	CEO	Interim Managing Director	1/2/2024	Major 4	Possible	3 1	Financial incentives (market force supplement scheme) Review of pay and benefits package. Introduction of career grade structures in Planning and Project Management Recruitment improvement plan in place Investors in People HR programme in place Shareholder Forum in place to hold Publica to account.	Moderate Probable	Moderate Probable	12	The recommendation to in-source the majority of services from Publica back into the Council has been approved by Cabinet. All partner Councils have also had the recommendation approved. The Detailed Transition Plan has been approved by CO and following this formal consultation commenced with a successful transfer on 1/11. Work continues to ensure payroll is setup and employees are paid on 20/11. Council structure charts are now finalised and external recruitment is underway for critical senior vacant positions. Communications on the Publica structure will be undertaken ensuring those who remain within Publica are supported and receive the same levels of communication, as those who will be transferring back to councils under a TUPE transfer. Governance arrangements for the partnership will be reviewed as part of new model with work currently being undertaken by Local Partnerships. Publica has met its savings target for 23/24 and this will be reflected in the end of year accounts, plus additional in year savings achieved. Interim MD in place and new Board Chair. See RS for more detail.	CEO	Jan-24	Risk Reduction	Open	
CDC PR 4	Failure or non delivery of other key suppliers /providers / partners	CDC commissions a number of service providers to deliver services on behalf of the District Council (Bromford, Cottsway). If these providers fail and / or do not deliver services, this may have a financial, reputational and service delivery impact.	delivering good services	CEO	CEO	1/2/2024	Moderate	Possible	3	Contracts and Service agreements in place Meetings in place with service providers	Moderate	Moderate Possible	9	Contract Management forms part of Annual Manager assurance statement. Requirement for more formal updates on key suppliers /contracts	CEO	Ongoing	Risk Reduction	open	
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CDC MPR 1	Failure to deliver CDC programme of major projects	If the Council does not undertake adequate due diligence opn major projects prior to a decision/commencement, there is a risk of poor decision making, weak governance, affordability, and reputational risk. If the Council does deliver on it's major projects, this could result in non delivery of Council priorities, cost increases, financial pressures and reputational damage	delivering good services	CEO	Assistant Director - Property & Regeneration	1/2/2024	Major 4	Possible	3	All projects require a detailed business case and sign off before proceeding. Project Manager appointed to manage all major projects Project reporting in place, including risk reporting on a monthly basis.	Moderate	Moderate Possible	g	Due to inflation, project costs are increasing for major projects and the cost of borrowing is impacting, in some cases on the viability of businesses cases. This is being monitored on a case by case basis. Management Team have a monthly meeting to review all CDC projects, progress and risks.	AD - Property & Regeneration	Ongoing	Risk Reduction	Open	
CDC MPR 2	Rise in costs to the Council due to project funding being withdrawn	If the Council does not meet grant funding criteria it may be required to repay funding or may not receive retrospective funding, after it has already incurred expense	responding to the climate emergency	CEO	CDC Climate Lead	2/2/2024	Moderate	Possible	3	Relates currently to ORCs funding. If deadline for completion is missed due to external factors i.e. delays from DNO, would not be eligible for funding which the Council has already recieved. OCC cannot divest risk within contract with supplier. Cost risk circa £90K. Due diligece and proactive comms with EST (fund admin) reduces risk. SLT briefed and Cabinet being updated so they are aware of risk	Moderate	Moderate Remote	6	O Effective management of contract - PM in place.	Climate Lead	Ongoing	Risk acceptance	Open	New Risk