









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

|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|

CDC IR 8	Staff Resources	<p>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.</p> <p>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.</p>	delivering good services		Ass Director, Organisational Effectiveness	1/2/2024	Major	4	Possible	3	12	Recruitment team in place. Benefits package Branding IIP	Moderate	Possible	9	Moderate	Probable	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.	CEO	Ongoing	Risk Reduction	Open	
CDC IR 9	Uninsurable Risk	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		CEO	1/2/2024	Major	4	Possible	3	12	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.	Major	Remote	8	Major	Remote	8	0	Consderation of Insurance Risk earmarked reserve to mitigate any underlying uninsurable costs where appropriate.	S151		Risk Acceptance & Retention	Hold	
External Risks (ER)																									
CDC ER 1	Cyber Attack / Data Breach / Data Loss	<p>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</p> <p>If staff are not trained in phishing, this could lead to a successful cyber attack, loss of income through financial payments being made.</p>	delivering good services		Business Manager - ICT	1/2/2024	Extreme	5	Probable	4	20	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	16	Major	Possible	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	3	Possible	3	9	New risk to replace Covid specific risks, as Covid is now BAU. Lessons learnt from previous pandemic, Council and partners are now setup to work remotely and able to continue to deliver services in the midst of a pandemic. There is an effective framework in place with LRF partners.	Moderate	Possible	9	Moderate	Possible	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	S151	Head of CFEU	1/2/2024	Major	4	Probable	4	16	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	9	Moderate	Possible	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	12	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	Major	Possible	12	0	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  LRF	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	3	Probable	4	12	Desire of Council to become carbon neutral, however affordability and government funding to achieve this may not be in line with ambitions	moderate	possible	9	moderate	possible	9	0	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 D51) 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 504 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	3	Possible	3	9	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.	Moderate	Possible	9	Moderate	Possible	9	0	Further review of requirements once NPPF consultation response is published by the government.	Strategic Housing Manager	Ongoing	Risk Reduction	Open	
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	12	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 meetings (monitoring, CTWG)	Moderate	possible	9	Moderate	possible	9	0	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	16	Contract monitoring and management in place. Monitoring of service offer to drive income	Moderate	possible	9	Moderate	possible	9	0	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	12	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	12	Moderate	Probable	12	0	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 CDC 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 R5 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	3	Possible	3	9	Contracts and Service agreements in place Meetings in place with service providers	Moderate	Possible	9	Moderate	Possible	9	0	Contract Management forms part of Annual Manager assurance statement. Requirement for more formal updates on key suppliers /contracts	CEO	Ongoing	Risk Reduction	open	
Major Project Risks (MPR)																									
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	12	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	Possible	9	Moderate	Possible	9	0	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	3	Possible	3	9	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. CDC cannot divest risk within contract with supplier. Cost risk circa £90K. Due diligence and proactive comms with EST (fund admin) reduces risk. SLT briefed and Cabinet being updated so they are aware of risk	Moderate	Remote	6	Moderate	Remote	6	0	Effective management of contract - PM in place.	Climate Lead	Ongoing	Risk acceptance	Open	New Risk