

## Cotswold District Council - Corporate Risk Register 2020-21 Q3

## Overarching strategic risks

Risk Code	Description	Risk Factors	Internal Controls	Current Impact	Current Likelihood	Current Rating	Last Review Date	Latest note	Assigned To
CRR-D01-014	If the Government imposes legislative changes that are not expected then it could have an impact on the Council's finances and other resources	Financial Community	Horizon scanning Professional publications Four year funding settlement	3	5	15	10-12-20	10-Dec-2020 The Council is responding to the Government's requirements of local authorities to implement initiatives related to Covid-19. The Government has provided some funding for additional costs and lost income. Council approved a revised budget in September 2020 to reflect this impact. The impact has been reduced in recognition of the revised budget.  The Council has responded to the consultation on Defra's Waste and Resources strategy. The Strategy suggested that garden waste collection should be free which if imposed would have a significant financial impact on the Council. Defra has now published its consultations response which acknowledges the strong opposition from LAs and accepts that this proposal needs to be reconsidered. Any financial implications will be considered as part of the update to the Council's MTFS	Chief Finance Officer
CRR-D01-019	If there are insufficient resources to deliver the objectives of the new Corporate Strategy and Plan then the expectations of our communities may not be met resulting in lower satisfaction and reputational damage	Financial Community Reputational	Medium Term Financial Strategy	3	3	9	10-Dec-20	10-Dec-2020 No change in rating. The financial implications of the Council's new Corporate Strategy have been included in the refresh of the Medium Term Financial Strategy. The latest MTFS was approved by Council in February 2020 and included funding for resources to support the Council's new priorities. The MTFS has been updated to reflect the impact of Covid 19 on the Council's finances, decisions taken post February 2020 and to reflect delays to the implementation of the Fairer Funding Review and Business Rates Retention. The Council has also approved a Recovery Investment Strategy which allocates capital funding for investment in Council Priorities and to provide a revenue stream to the Council.  This risk links to risk CRR-D02-028 regarding the Local Government Funding Settlement over the Medium Term. This is the biggest risk to the deliverability of the objectives in the new Corporate Strategy.	Chief Finance Officer
CRR-D01-018	If the Government does not provide adequate funding to the Council to enable the Council to fulfil new expectations of the Council's role in preparations for the UK exit from the EU, there could be negative implications on the Council's reputation or the Council's finances	Financial Community	Public Executive Director undertaking role of Brexit Lead Officer as per requirement from MHCLG  Local Resilience Forum  Government funding	3	2	6	18-Dec-20	The Brexit Risk Register is being maintained and any change to this assessment will be reflected accordingly. Funding has been provided by the government to CDC to fund its Brexit preparations.	Executive Director - Commissioning; Interim Chief Executive
CRR-D01-017	If the UK leaves the European Union with no deal then there could be a disruption to the delivery of Council services which would impact on residents/communities	Community Financial Performance	Support from the LGA  Local Resilience Forum  Government funding to support Councils  Business Continuity Plans  Service specific planning - Publica ERS, Ubico and GLL  Publica Executive Director undertaking role of Brexit Lead Officer as per requirement from MHCLG	3	1	3	4-Jan-21	The Brexit Planning Group is continuing to meet at the present time and is currently undertaking a fundamental review of the risk register to take account of any changed circumstances.	Executive Director - Commissioning; Interim Chief Executive

CRR-D01-016	If the government does not provide timely and adequate guidance on the proposed changes to the planning system then the Council will be unable to identify the type of local plan update that is required. Delays to preparing an updated local plan may result in an increase of speculative planning applications on the fifth anniversary of the local plan's adoption (2023).	Financial Reputational	Local Plan Adopted in Aug 2018.  Local Plan Programme Board reconvened with updated Terms of Reference and membership	3	1	3	14-Dec-20	14-Dec-20 Risk updated from being a local plan not yet adopted, to being the proposed changes to the planning system in the Government's White Paper.  The Local Plan has been adopted for some time now. Key risk now is the government's planning reform white paper (WP) and how this will affect the recent decision to partially update the adopted local plan. The WP seeks to partially dipense with the extant discretionary planning system and move partially to zonal planning system. The expectation is that a new style local plan should be adopted by 2024. The government is simultaneously seeking to make specific changes to the national 'standard method for calculating housing need', the outcome is to raise Cotswold's housing need from c.480 to 1,209 dwellings per year for the next 10 years. However, this must be seen in the context of another WP proposals that proposes to create a national 'standard method for calculating the housing requirement', which will use the housing need figure together with local constraints such as the AONB to create a local plan housing target. This may reduce to eventual housing target for the district - but the WP does not offer any details at this stage and there maybe an interim period where speculative developers seek to apply the unconstrained 'housing need' figure to undermine the up-to-dateness of the adopted local plan and therefore the soundness of the council's five year housing land supply. In November 2020, Cabinet agreed to a short term pause in formal plan making activities and will review this position once nationally prescribed housing need figures have been updated.	Group Manager - Strategic Support
-------------	---	------------------------	---	---	---	---	-----------	--	-----------------------------------

#### Financial management & control

Risk Code	Description	Risk Factors	Internal Controls	Current Impact	Current Likelihood	Current Rating	Last Review Date	Latest Note	Assigned To
CRR-D02-028	If the Local Government settlement over the medium term is unfavourable then the Council's savings target may need to increase	Financial	Medium Term Financial Strategy  Only legacy Payments of New Homes Bonus in MTFS  Publica Transformation Programme  Recovery Investment Strategy approved by Council Sept 20	3	3	9	10-Dec-20	10-Dec-20 No change to rating. The MTFS was approved in Feb 2020. New Homes Bonus awarded for 2020/21 will be for one year only (no legacy payments from 2021/22). The significant changes to LG Funding (75% Business Rate Retention, Business Rate Reset, Fairer Funding Review and new Spending Round) have been delayed until 2022/23 and is reflected in the update of the MTFS which will be considered by Council in Feb 21. MTFS includes savings targets to address changes to government funding.  Council approved a Recovery Investment Strategy in Sept 20 which aims to increase income to the Council to mitigate against reduced government funding.	Chief Finance Officer
CRR-D02-018	If unavoidable budget pressures exceed provision within the MTFS then the Council may need to: find additional income or savings, use its reserves, or there may be pressures on services or tax levels and agreed budget targets will not be achieved	Financial	Service Delivery Planning  Budgetary control system  Publica Strategic Directors/Group Managers and Business Managers engaged in updated of budget and MTFS  Key variances reported to Cabinet and Overview and Scrutiny Committee	3	3	9	10-Dec-20	No change to rating. The 2020/21 budget has been revised to reflect the impact of Covid 19. Key service providers (Publica, Ubico and SLM) have been engaged in the revised budget and have also fed in to the draft budget proposals for 2021/22 which will be subject to consultation before Council determines the final budget for 2021/22.  The Council has determined its Priorities and the financial resources required to enable the Council to deliver against its priorities had been included in the MTFS and associated 2020/21 budget.  Members and Officers are working on a plan to increase income to the Council to fund both new objectives from the new Corporate Strategy and to bridge the expected funding gap from 22/23 as a result of changes to local government funding.	Chief Finance Officer
CRR-D02-030	If Ubico is unable to deliver services to the required standard or to budget then it could damage the Council's reputation and result in additional costs for the Council	Financial Reputational	Service management  Performance monitoring  Service risk registers	4	5	20	10-Dec-20	Update 10-12-20 Ubico is experiencing demand for recycling services over and above expectations of the new service. This has resulted in additional vehicles being utilised and associated additional numbers of operatives to deliver services. Ubico has also required additional personal protective equipment to protect its staff from Covid 19. These additional costs have been incorporated within the revised budget for 2020/21 approved by Council on 23 September 2020. Provisions for some additional costs have been incorporated within the draft budget for 2021/22.	Business Manager - Commissioning strategy
CRR-D02-027	If Publica does not deliver the agreed objectives in accordance with its business plan then the planned savings for the Council would not be delivered and consequently there would be a risk that services could not be delivered in line with the budget	Financial Reputational	Programme Board  Local Political Support  National Political Support  Early Engagement with employees and Unions  Funding provided to develop detailed business case	3	2	6	17-Dec-20	Likelihood risk reduced from 3 (possible) to 2(remote). After a successful 2019/20 where the overall savings target of £0.93m was delivered together with additional one-off savings of £0.36m there were some concerns about the deliverability of the £0.5m additional target for savings in 20/21. At the half way stage of the year we appear to be on track to deliver these savings despite the impact of Covid 19. Indeed the major shift to home working has reduced the travel costs within the organisation which has assisted meeting the target for 20/21. We are now progressing actions to deliver against business case targets for 2021/22 with outline plans to include a further target of £0.5m in draft budgets.	Interim Chief Executive; Managing Director

CRR-D02-024	If the Council is unable to meet the savings required to balance the budget then it may need to make unplanned use of revenue reserves, raise council tax, find further savings and/or cut services	Financial Performance Community	Regular meetings with Members and Cabinet MTFS and budget process Publica Group Managers/Business Managers and Strategic Directors involved in budget process Publica Transformation Programme Recovery Investment Strategy	3	3	9	10-Dec-20	10-Dec-2020 No change in rating. Savings from the leisure contract of £35,000 will not materialise in 2020/21 and have been removed from the revised budget for 2020/21.  The level of savings required as a result of changes to local government funding which will now come into effect in 2022/23 remains unclear. The Council has approved a Recovery Investment Strategy to deliver the savings, or generate additional income, required from changes to local government funding.	Chief Finance Officer
CRR-D02-029	If contractors do not meet their obligations under key contracts then it could lead to a fall in service standards, reduced customer service or a failure to meet legal requirements	Financial Reputational	Robust and effective contract management to ensure standards and requirements in contracts are met and any failings are identified and addressed quickly and effectively  Regular meetings to review performance/standards	3	3	9	18-Dec-20	No change in rating. An internal audit report has identified improvement in procurement and contract management to be implemented.	Business Manager - Commissioning strategy
CRR-D02-005	If there is a legal challenge to any of the Council's decisions or actions then there may be financial or policy implications	Financial Legal Reputational	Managerial advice and supervision  Legal advice and effective role of monitoring officer  Robust internal procedures  200k in MTFS for planning appeals	3	2	6	18-Dec-20	No change in rating	Head of Legal
CRR-D02-002	If the Council fails to meet income targets then it may need to make unplanned use of revenue reserves, raise council tax, find further savings and/or cut services	Financial Performance Community	Systems of budgetary control  Appropriate marketing of services and consideration of effective charging levels  Project management arrangements	3	3	9	10-Dec-20	No change in rating, 2020/21 budget has been revised to reflect impact of Covid 19 on income budgets. Draft budget 2021/22 has been prepared in consultation with Publica officers and reflects reduced development control income.	Chief Finance Officer
CRR-D02-017	If the level of pay inflation exceeds provision in the MTFS then the Council may need to make unplanned use of revenue reserves, raise council tax, find further savings and/or cut services	Financial	National negotiations on pay award	3	3	9	10-Dec-20	Revised budget 2020/21 includes an increase in the final pay award of 0.75%	Chief Finance Officer
CRR-D02-023	If there was a civil emergency in the District then there could be a financial burden on the Council in responding to it	Financial	Mutual aid arrangements would enable support and reduce the resource burden on one individual council  The Belwin scheme enables costs incurred over a threshold (approx. £22K) to be reclaimed  Insurance of council's assets and some loss income  General Fund Working Balance  Flood engineering schemes in place to minimise the impact of severe weather and reduce the risk of property flooding	2	3	6	11-Dec-20	11-Dec-20 No change in rating. There are good internal controls in place to help mitigate this financial risk. The Covid-19 response has increased the risk to capacity if a concurrent event were to occur; but as section 31 grants have been forthcoming to support the Covid response from an emergency planning perspective and with Belwin in place for other events the financial risk remains the same as pre-Covid.	Group Manager - Strategic Support
CRR-D02-031	District Councils are required to provide rest centres for the Public during a Civil Emergency. If staff are unwilling to come forward and volunteer with the running of a rest centre, there is a risk that the Council will be unable to fulfil its duty in providing a safe rest centre.	Legal Reputational	Small team of volunteers established (although some have left Publica in recent months). Training and support provided by the County Civil Protection Team.  New staff have emergency planning incorporated in Job Roles  Mutual aid can be called upon  It is becoming more common place to use hotels as opposed to rest centres	3	2	6	11-Dec-20	11-Dec-20 Call out policy has been drafted which will give staff the assurance that they will be compensated with a flat rate of pay for an emergency response.  Rest centre manager and deputy in place  Recruitment drive to replace volunteers who have since left the Council/Publica.	Group Manager - Strategic Support

CRR-D02-032	Without clear and robust procurement procedures, Publica and Partner Councils will not benefit from the most economically advantageous procurement opportunities and may fail to comply with the law governing Public Procurement Rules.	Financial Legal Reputational	Procurement rules approved Council. Publica Procurement Team able to provide procurement advice and assistance on major procurements.	4	3	12	11-Dec-20	Draft Commissioning and Procurement User Guide for Officers involved in procurement has been produced and is currently out for comment Training on commissioning and procurement to be provide by end of financial year.	Executive Director: Commissioning
-------------	--	------------------------------------	---	---	---	----	-----------	---	--------------------------------------

Customer focus

Risk Code	Description	Risk Factors	Internal Controls	Current Impact	Current Likelihood	Current Rating	Last Review Date	Latest Note	Assigned To
CRR-D03-007	If the Council does not consult properly, or Publica does not consult properly on the Council's behalf, then the Council's decisions could be challenged	Community Reputational Legal Financial	Communication team  Engagement strategy  Neighbourhood coordination meetings  Annual Town & Parish council meetings  Annual Budget consultation	3	2	6	10-12-20	No change in rating. Budget consultation proposals were approved by Cabinet in September 2020 for consultation.	Interim Chief Executive

Organisational learning, staffing & development

Risk Code	Description	Risk Factors	Internal Controls	Current Impact	Current Likelihood	Current Rating	Last Review Date	Latest Note	Assigned To
CRR-D04-003	If Publica or the Council is unable to recruit suitable staff and retain them, particularly in some key service areas then the level of service delivery may be reduced	Performance Financial Reputational Community	Financial incentives (market force supplement scheme)  Work with partners to address skill shortages	3	3	9	10-Dec-20	10-12-2020 No change in rating. Quarterly performance reports are shared with Joint Management Team so any necessary mitigation to maintain service delivery levels can be discussed. Some difficulty recruiting senior staff in certain professions, e.g. Planning. Monthly HR reports to Exec also highlight recruitment. Apprentice, intern and graduate schemes are in place. New pay and grading system in place and HR are now starting to work with managers to use this to provide more flexibility for recruitment and retention in services where recruitment remains challenging.	Interim Chief Executive; Managing Director
CRR-D04-009	If staff morale and motivation is low in Publica then the level of service delivered may be reduced in some services	Performance Community	Communication  Comprehensive consultation and engagement process  Change management training  Joint Liaison Forum  2020 Engagement Strategy	2	3	6	10-Dec-20	Despite the impact of Covid 19 on working arrangements and the very significant impact on workloads the resilience of staff has been remarkable. The welfare surveys being carried out on a regular basis point to broadly good levels of morale although some areas are struggling with the working arrangements. The launch of the broad based leadership programme should assist in the new year together with the Investors in People programme.	Interim Chief Executive; Managing Director
CRR-D04-011	If key Officers in the Council (such as the Interim Chief Executive, Chief Finance Officer or Monitoring Officer) are not available, the Council may not be able to respond effectively to urgent matters which could result in reputational or financial damage	Legal Financial Reputational	Deputy CFO and Monitoring Officers in place  Support from Shared Legal Services team- employed by the Publica Partner Councils  Support from professionals within Publica (e.g. Strategic Directors, Group Managers, Accountants, HR)  Support available from other Statutory Officers from across the Publica Partner Councils  Effective working relationships between Officers and Cabinet Members  Risk management processes	3	2	6	10-Dec-20	No change to rating.	Interim Chief Executive; Managing Director

Business processes

Risk Code	Description	Risk Factors	Internal Controls	Current Impact	Current Likelihood	Current Rating	Last Review Date	Latest Note	Assigned To
CRR-D05-001	If the Council's data is of poor quality or it does not make appropriate use of its data then the decisions it makes may be flawed	Reputational Financial Legal Performance Community	Internal processes and self assessments  Internal audit assurance and support  Dedicated staff resource on performance management and data quality  Performance Management Framework	3	3	9	18-Dec-20	No change in rating. Data quality and the use of information is being addressed as part of the organisational re-design. The Business Manager responsible for business analytics is working with the Lead officer for information on data quality. Two new data analysis posts are currently being recruited	Chief Finance Officer; Interim Chief Executive
CRR-D05-016	If the Council does not comply with relevant Information Management legislation including the new GDPR and Transparency Agenda then the government may intervene which could have a reputational impact on the Council	Financial Reputational Legal	Access to Information Policy  FOI process reviewed  LGA guidance and supporting documents & templates	3	3	9	18-Dec-20	18-12-2020 No change in rating.  Progress on the GDPR Action Plan is being reported to the Council and Publica on a regular basis.  Mandatory refresher data protection training rolled out in Sept 2020  Increase internal communications on portal to raise awareness on informational security  Introduced revised Covid Information Sharing Protocols internal and externally with NHS and OCC  Conducting a data audit  Preparing for data protection after the EU Exit Transition period	Data Protection Officer; Interim Chief Executive
CRR-D05-019	If contractors do not comply with health and safety requirements then there could be both financial and reputational implications for the Council	Financial Reputational	Contract management in place to ensure appropriate measures such as risk assessments, appropriate policies, and training is in place.  Health and Safety business partners provide advice and support  Concerns can be escalated to contractors' senior management	4	2	8	18-Dec-20	No change in rating	Group Manager - Commissioning
CRR-D05-013	If there is insufficient capacity to respond to an emergency then the Council may not be able to deal effectively during emergencies resulting in reputational damage	Reputational Legal Financial Community Performance	Contract terms with SLM (Everyone Active) e.g. use of leisure centre as a rest centre  Mutual aid arrangements  Good will of staff  Ward Members, Town & Parish Councillors on hand/training provided  Enhanced community resilience arrangements  Emergency management framework in place with duty officer arrangements	3	3	9	11-Dec-20	11-Dec-20 The new emergency management framework has been in place since late 2019, which includes two deputy DEPLOs for Cotswold District, as well as an overall emergency planning lead for the Publica partnership.  The flood response in early 2020 provided assurance that this arrangement provides capacity, as has the Covid-19 community support provided.  Given that we are heading in to the inclement weather period, the likelihood rating has been increased to a 3.	Interim Chief Executive; Managing Director
CRR-D05-010	If there is severe weather then the Council may be unable to deliver key services which could impact on residents	Performance Community Reputational	BCPs  Weather reports/national news  Remote working solution available to staff	3	2	6	11-Dec-20	11-Dec-20 No change in rating. All business continuity plans have been updated.	Interim Chief Executive; Managing Director

CRR-D05-011	If the Council's IT System / infrastructure failed due to cyber attacks and/or virus then system performance could be reduced leading to poor service delivery/financial impact	Performance Financial Legal Reputational	Preventative measures introduced such as blocking of USB and other devices  Undertaken and passed a central government ICT audit, meeting the very high standards set for network security  Introduction of new / revised joint policies  Periodic staff awareness training  BCP in place and reviewed & tested	3	2	6	18-Dec-20	18-Dec-2020 No change in rating.  All Councils have PSN accreditation in Oct 2020  Progress on the Cyber Security updates and Action Plan is being reported to the Council and Publica on a regular basis.  Introduction of an Information Asset Register  Undertake an improved phishing awareness campaign to improve user's awareness of the risks  Increased reviews on the ICT disaster recovery plans	Group Manager - Business Support Services
CRR-D05-012	If there is a loss of data (both on site and as a result of remote/mobile working) / security failure in our IT systems then it could lead to a reduced level of service and have a negative impact on the Council's reputation and finances	Performance Financial Legal Reputational	Preventative measures introduced such as blocking of USB and other devices  Undertaken and passed a central government ICT audit, meeting the very high standards set for network security  Introduction of new / revised joint policies  Periodic staff awareness training  BCP in place and reviewed & tested	3	2	6	18-Dec-20	18-Dec-2020 No change in rating.  All Councils have PSN accreditation in Oct 2020  Progress on the Cyber Security updates and Action Plan is being reported to the Council and Publica on a regular basis.  Introduction of an Information Asset Register  Undertake an improved phishing awareness campaign to improve user's awareness of the risks  Increased reviews on the ICT disaster recovery plans  Introduction of ICT Remote Working Policy / guidance	Group Manager - Business Support Services
CRR-D05-014	If the Council's buildings are destroyed then it would be unable to operate/deliver services which would impact on residents /communities	Reputational Financial Legal Performance Community	BCPs including ICT contingency plans  Remote access  Mutual aid through Shared working strategy  Insurance  Fail over protocol	2	2	4	11-Dec-20	11-Dec-20 Impact rating reduced to 2. All business continuity plans have been updated.  The ability to deliver services without a reliance on Council buildings has been demonstrated during the Covid-19 response, with approximately 80% of staff working from home and others conducting their work out in the community.	Group Manager - Strategic Support

#### Longer term risks

Risk Code	Description	Risk Factors	Internal Controls	Current Impact	Current Likelihood	Current Rating	Last Review Date	Latest Note	Assigned To
CRR-D06-002	If Health and Safety procedures and risk assessments are not in place /being followed then staff could be injured undertaking Council duties which would impact on their health and wellbeing, affect their ability to work and create liability issues for the Council	Legal Financial Reputational	Health and Safety procedures  Access to weather forecasts  Lone workers policy  Business Continuity Plans	4	2	8	11-Dec-20	11-Dec-20. No reportable incidents to the Health & Safety Executive in the quarter. Local H&S Committee has been established and first meeting was held on the 21.11.20 where the new H&S Plan and Audit Schedule were presented and signed off. A Q2 H&S update was provided to the Board in December.	Interim Chief Executive; Managing Director