

Cotswold District Council - Corporate Risk Register 2020-21 Q4
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	21-Apr-21	21-April-2021 The Council continues to respond 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 and the Council has profiled budgets accordingly based on financial risks associated with the pandemic, a revised budget was approved in September 2020 and the new budget agreed in February 2021.	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	21-Apr-21	21-April-2021 No change in rating. The financial implications of the Council's new Corporate Strategy have been included in the Medium Term Financial Strategy. The latest MTFS was approved by Council in February 2021 and includes additional funding for resources to support the Council's new priorities which were identified in 2020 within the revised MTFS (Sept 2020) and within the Recovery Investment Strategy which also 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	Publica Executive Director undertaking role of Brexit Lead Officer as per requirement from MHCLG Local Resilience Forum Government funding	3	2	6	21-Apr-21	21-April-2021 No change to rating. Brexit has completed and the Council continues to monitor any risks or issues as a result of the related legislative changes. 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	4	3	21-Apr-21	Risk now removed	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	21-Apr-21	21-Apr-2021 Risk of speculative applications has reduced in the short term. Forthcoming request will be made to Cabinet to reboot the partial update of the local plan project 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 dispense 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'. In February 2021 the government confirmed that the district's housing need will be 490 dwellings per year rather than the proposed 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. The risk of speculative developers seeking to apply the unconstrained 'housing need' figure has reduced significantly as a direct result of the now confirmed and smaller housing need figure. In May 2021, Cabinet will be asked to reboot the formal plan making activities and to proceed with preparing a partial update to the local plan.	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	21-Apr-21	21-April-2021 No change to rating. The MTFS was approved in Feb 2021. New Homes Bonus awarded for 2020/21 and 2021/22 is 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 was approved by Council in Feb 21. MTFS includes savings targets to address changes to government funding. The 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	21-Apr-21	21-April-2021 No change to rating. The 2020/21 budget was 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 budget for 2021/22 approved in February 2021. 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 2021/22 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	21-Apr-21	21-Apr-2021 Waste and recycling volumes have remained consistently the same as that seen during 2020 (approximately 20% increase) and so the additional vehicles and resources are still required and in place. The need for additional personal protective equipment is also still in place for Ubico to protect its staff from Covid-19. The Council has provided additional funding in 2020/21 and 2021/22 budgets accordingly. Ongoing budget implications will be included within the MTFS Update and budget for 2022/23.	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	2	2	4	21-Apr-21	21-Apr-2021 Impact risk reduced from 3 (moderate) to 2(minor). After a successful 2020/21 where the preliminary outturn suggests the overall savings target of £0.5m was delivered Publica has now largely delivered its business case targets. The target for 21/22 is a further £0.5m and steps are in place to deliver the bulk of this. Any risk of under delivery against the Cotswold share of the target is low and falls within the definition of minor in the policy (less than £100k).	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	21-Apr-21	21-April-2021 No change in rating. Impacts on income resulting from the Covid-19 which include leisure services management fee, rental and parking incomes have been considered and incorporated into the 2021/22 budget. 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	21-Apr-21	21-Apr-2021 No change in rating.	Group Manager - Commercial Growth
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	21-Apr-21	21-Apr-2021 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	21-Apr-21	21-Apr-2021 No change in rating. 2020/21 budget revised to reflect impact of Covid-19 on income budgets. Budget 2021/22 has been prepared in consultation with Publica officers and reflects reduced development control income and provides for reduced income in first quarter of the financial year offset by Government funding through Sales and Charges Compensasion Scheme.	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	21-Apr-21	21-Apr-2021 Budget 2021/22 includes provision for a pay award of 1%. Government has proposed a public sector pay freeze. This is subject to negotiation with unions.	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	21-Apr-21	21-Apr-2021 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-19 response from an emergency planning perspective and with Belwin in place for other events the financial risk remains the same as pre-Covid-19.	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	21-Apr-21	21-April-2021 No change in rating. The Council managed the concurrent pandemic and flooding emergencies in December 2020 which saw temporary accommodation provided to residents.	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.	3	2	6	21-Apr-21	21-Apr-2021 Reduced rating - The mandatory procurement training was rolled out January 2021. As of today, 380 people have completed it but a total of 451 people have accessed it. We have also updated the Contract Rules, and will be shortly scheduling in the training once it has been finalised with the legal team.	Executive Director: Commissioning
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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	21-Apr-21	21-Apr-2021 No change in rating.	Deputy 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	21-Apr-21	21-Apr-2021 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. A review of recruitment has recently been established and feedback from managers, staff (both Publica and Retained), clients and Councillors is being collated to help ensure the service meets users' needs and is both flexible and modern going forward. Work is also underway to develop career graded roles to assist with retention and development of staff in key areas.	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	21-Apr-21	21-Apr-2021 Despite the continued impact of Covid-19 on working arrangements and significant impact on workloads the resilience of staff has been remarkable. The last welfare surveys carried out in February showed that responses remained overall positive despite the impact of the 3rd lockdown.	Chief Executive; Managing Director
CRR-D04-011	If key Officers in the Council (such as the Chief Executive, Deputy Chief Executive 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	21-Apr-21	21-Apr-2021 No change to rating.	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	21-Apr-21	21-Apr-2021 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 have been 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	21-Apr-21	21-Apr-21 No change to rating Progress on the UK-GDPR Action Plan & GDPR Risk Register is being reported to the Council and Publica on a regular basis. Mandatory refresher Information Security / Data Protection on-going , target completion date Oct 2021. Increase internal communications on portal to raise staff awareness on data security Covid Information Sharing Protocols internal and externally with NHS and OCC continually updated Conducting a Data (applications) audit Implement new UK – GDPR changes to Council systems Introduction of new Data Security Portal	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	21-Apr-21	21-Apr-2021 No change in rating	Group Manager - Commercial Growth
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	21-Apr-21	21-Apr-2021 The new emergency management framework has been in place since late 2019, which includes two deputy DEPLOs for Cotswold District, as a well as an overall emergency planning lead for the Publica partnership. A review of the flood response in December 2020 has been conducted.	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	21-Apr-21	21-Apr-2021 No change in rating.	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	21-Apr-21	21-Apr-2021 No change in risk rating. Council achieved PSN accreditation in Oct 2021 Publica to achieve Cyber Essentials accreditation in Sept 2021 Ongoing network Internal & External Penetration checks Regular review of User Privileges Progress on the Cyber Security updates and Action Plan is being reported to the Council and Publica on a regular basis. Continual update Information Asset Register Additional Phishing awareness training to educates employees on how to spot and report suspected phishing attempts Continual Password Audits across our network to evaluate weak passwords Periodic reviews Business Continuity & Disaster Recovery Plans Continual review of staff development	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	21-Apr-21	21-Apr-21 No change to the risk rating - All partner Councils achieved PSN accreditation in Oct 2021 Publica to achieve Cyber Essentials accreditation in Sept 2021 Ongoing network Internal & External Penetration checks Regular review of application User Privileges Progress on the Cyber Security updates and Action Plan is being reported to the Council and Publica on a regular basis. Continual update Information Asset Register Additional Phishing awareness training to educates employees on how to spot and report suspected phishing attempts Continual Password Audits across our network to evaluate weak passwords Periodic reviews Business Continuity & Disaster Recovery Plans Continual reviews of staff development	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	21-Apr-21	21-Apr-2021 No change in rating. Move to Agile working strategy during the pandemic has proved majority of services can be delivered remotely.	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
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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	21-Apr-21	21-Apr-2021 No reportable incidents to the Health & Safety Executive in the quarter. Public Health & Safety Officers met with Unions on the 21st Jan and the 20th April where an update on the new H&S Plan, Audit Schedule and Accidents / Issues were presented.	Chief Executive; Managing Director
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