

Cotswold District Council - Corporate Risk Register

Deliver the highest standards of service													
Risk ID	Description of Risk/Opportunity	Initial Risk Assessment			Existing Control, Mitigation or Contingency	Previous Residual Risk Score			Residual Risk Assessment			Direction of Travel	Risk Response & Further Action
		Impact	likelihood	score		Impact	likelihood	score	Impact	likelihood	score		
CRR-016	<p>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).</p> <p>Risk Logged: April 2008</p> <p>Risk Owner: Chief Executive</p> <p>Responsible Officer: Publica Business Manager for Localities</p>	4	4	16	<ul style="list-style-type: none"> Local Plan Adopted in Aug 2018. Local Plan Programme Board reconvened with updated Terms of Reference and membership * Cabinet approved Local Development Scheme in 2021, which confirms LP update key milestones and estimated delivery date. 	3	4	12	4	4	16	↑	<p>06-July-2022. Government has published its Levelling Up and Regeneration Bill which seeks to significantly alter the planning system, technical details are deferred to secondary legislation and consultations on updated policy and guidance (expected within the next 12 months).</p> <p>08-June-2021 (remains relevant at Jan 2022) Partial update of Local Plan has restarted. However, the government announced in May 2021 (via the Queen's Speech) its intention to publish a Planning Bill in the autumn 2021 and carry forward many of the proposed changes suggested by its white paper. The exact details are unknown at this stage but suggested changes are not comparable (in terms of scale and fundamentals) with recent updates and it will have a notable impact on the town planning profession and the Council's statutory duties. The Council's approach to partially updating the Local Plan (rather than a full update) is finely balanced but it continues to offer the most expeditious route to deliver Corporate Strategy actions. This position will need to be reviewed in light of the eventual Planning Bill.</p>
CRR-019	<p>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.</p> <p>Risk logged: August 2014</p> <p>Risk Owner: S.151 Officer</p> <p>Responsible Officer: Publica Managing Director</p>	3	3	9	Medium Term Financial Strategy	3	3	9	3	3	9	→	<p>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 2022 and includes funding for resources to support the Council's priorities which were identified in 2020. 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.</p> <p>This risk links to risk CRR-028 regarding the Local Government Funding Settlement over the Medium Term.</p>

CRR-028	<p>If the Local Government settlement over the medium term is unfavourable then the Council's savings target may need to increase.</p> <p>Risk logged: July 2015</p> <p>Risk Owner: S.151 Officer Responsible Officer: S.151 Officer</p>	4	4	<p>16</p> <ul style="list-style-type: none"> • 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	3	3	9	→	<p>The updated MTFS was approved in Feb 2022. The LG Settlement for 2022/23 is essentially a roll over of funding for 2021/22. The significant changes to LG Funding from Business Rate Retention and the Fairer Funding Review were delayed. The Secretary of State has recently announced a two-year funding settlement for 2023/24 and 2024/25. The MTFS will be refreshed to reflect this announcement. The MTFS includes savings targets to address changes to government funding.</p> <p>The Council approved a Recovery Investment Strategy in Sept 20 which aims to increase income to the Council to mitigate against reduced government funding. A refresh of the Recovery Investment Strategy will be considered by Council in July 2022.</p> <p>An Environmental Services Improvement Programme has been established to develop options for reducing the cost of the waste and recycling services.</p>
CRR-018	<p>Budget Pressure: if unavoidable budget pressures exceed provision within the MTFS, such as not making expected savings or failing to meet income targets, the Council may have to consider unplanned use of revenue reserves, raise Council Tax, find further savings and/or cut services.</p> <p>Risk logged: May 2010</p> <p>Risk Owner: S.151 Officer Responsible Officer: S.151 Officer</p>	4	4	<p>16</p> <ul style="list-style-type: none"> • 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	3	3	9	→	<p>The 2022/23 budget has been set following engagement with key service providers (Publica and Ubico) and reflected expected service costs at that point in time.</p> <p>Inflation is now far higher than when the budget was set, making in-year budget monitoring and management vital. Should the Council not be able to take mitigating action to avoid the full impact of raising costs, there may be a requirement to use some of the General Fund balance to manage the in-year cost pressure.</p> <p>The MTFS refresh has commenced and will incorporate the impact of higher inflation.</p>
CRR-027	<p>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.</p> <p>Risk logged: August 2014</p> <p>Risk Owner: Chief Executive Responsible Officer: Publica Executive Director (Services)</p>	4	3	<p>12</p> <ul style="list-style-type: none"> • Programme Board • Local Political Support • National Political Support • Early Engagement with employees and Unions • Funding provided to develop detailed business case 	2	2	4	0	0	6	↑	<p>Publica is fully engaged with the Council's savings targets and the Group Managers and Business Managers took part in a workshop in June to generate ideas which will flow through to the Council's budget setting process.</p>
CRR-032	<p>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.</p> <p>Risk logged: January 2021</p> <p>Risk Owner: S.151 Officer Responsible Officer: Publica Executive Director for Commissioning</p>	4	3	<p>12</p> <ul style="list-style-type: none"> • Procurement rules approved by Council. • Publica Procurement Team able to provide procurement advice and assistance on major procurements. • Commissioning and Procurement User Guide produced. • Training on commissioning and procurement being rolled out to all staff. • Commissioning & Procurement Board meeting monthly, attended by Chief Finance Officer 	3	2	6	3	2	6	→	<p>A refresh of the Procurement and Contract Management Strategy is in development.</p>

CRR-003	<p>In light of an extremely tight labour market and increasing inflationary pressures 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 could be reduced which would impact on residents/communities.</p> <p>Risk logged: April 2022</p> <p>Risk Owner: Chief Executive Responsible Officer: Publica Executive Director</p>	3	4	12	<ul style="list-style-type: none"> • Financial incentives (market force supplement scheme) • Work with partners to address skill shortages - Review of pay and benefits package. - Introduction of career grade structures in Planning and Project Management 	3	3	9	3	3	9	→	<p>6 June 2022 No change in rating. Quarterly performance reports enable any necessary mitigation to maintain service delivery levels to be discussed. A review of recruitment is underway to help ensure the service meets users' needs and is both flexible and modern going forward. Career-graded posts have been introduced into a number of service areas to assist with retention and development of staff. A new training offer has been promoted to staff as another retention measure with over 40 employees now undertaking professional development training. The pay and benefits system is being reviewed and consideration will be given to enhancing the pension scheme.</p>
CRR-009	<p>As we come out of the pandemic and move to permanent agile working arrangements there is a risk that the well being of our staff is not properly monitored and reviewed.</p> <p>Risk logged: April 2022</p> <p>Risk Owner: Chief Executive Responsible Officer: Publica Executive Director - Service Delivery</p>	4	5	20	<ul style="list-style-type: none"> • Regular reviews of change process • Impact of change measured via Staff forum and staff sickness • Comprehensive consultation and engagement process • Change management training • Joint Liaison Forum 	3	3	9	3	2	6	↓	<p>The IIP report identified some areas of weakness for us to work on and we held a Q&A session post sharing of IIP report. We have held some informal staff lunch get togethers to help re-introduce staff to the office environment and re-connect with colleagues face to face. We are delivering some key actions, including a new staff forum and relaunching the Trade Union liaison forum to help address some of the shortcomings identified in the IIP report.</p>
CRR-001	<p>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.</p> <p>Risk logged: March 2008</p> <p>Risk Owner: Responsible Officer: Publica Group Manager for Strategic Support</p>	3	4	12	<ul style="list-style-type: none"> • 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	3	3	9	→	<p>Additional mitigation has been put in place as part of a collective effort between Corporate Performance and Business Intelligence Teams to improve the accuracy and speed at which KPI data can be collected (moving some of the information into a live environment). A working group has been set up involving members of the scrutiny committee to develop improved assurance methods and metrics for councils relating to public services. Prototyping is in progress in relation to a live data assurance framework for Publica Services.</p>

CRR-011	<p>Cyber Security: 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.</p> <p>Risk logged: May 2013</p> <p>Risk Owner: S.151 Officer Responsible Officer: Publica Group Manager for Business Support</p>	5	4	20	<ul style="list-style-type: none"> Blocking of USB and other devices PSN compliance Revised policies Staff awareness training BCP in place, reviewed and tested Enhanced encryption software and other specialist cyber tools Investment in cyber training for the ICT Team All Councils have PSN accreditation, which compliments the Cyber Essential Plus. 	3	2	6	4	3	12	↑	<p>07.06.22 - Although protection measures are already well established, these are reviewed and updated to ensure they remain effective against new risks</p> <ul style="list-style-type: none"> Submission for the re-accreditation of Cyber Essentials to be sent in February 2022 Progress on the Cyber Security updates and Action Plan is being reported to the Council and Publica on a regular basis. Continual update of Information Asset Register Ongoing Password Audits across our network to evaluate weak passwords Detailed review of Business Continuity & Disaster Recovery Plans in light of the GC situation. Ongoing investment in cyber training and a review of capacity planned Security systems updated to monitor and specifically block attacks related to identified vulnerability All emails received from at risk location are quarantined and inspected by ICT staff before being released Security patches are applied to key system as soon as they are available Mandatory Cyber training rolled out to all staff Cyber briefings given to Council Exec teams
CRR-012	<p>Data Security: 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..</p> <p>Risk logged: May 2013</p> <p>Risk Owner: S.151 Officer Responsible Officer: Publica Group Manager for Business Support</p>	4	4	16	<ul style="list-style-type: none"> Blocking of USB and other devices PSN compliance Revised policies Staff awareness training BCP in place, reviewed and tested Enhanced encryption software and other specialist cyber tools Investment in cyber training for the ICT Team All Councils have PSN accreditation, which compliments the Cyber Essential Plus. 	3	3	9	3	3	9	→	<p>07.06.22 - Although protection measures are already well established, these are reviewed and updated to ensure they remain effective against new risks.</p> <ul style="list-style-type: none"> Additional online training to reinforce the need for staff to be aware of their responsibilities with regards to data security, passwords and GDPR is planned. Additional Phishing awareness training to educate employees on how to spot and report suspected phishing attempts is planned. All emails received from at risk location are quarantined and inspected by ICT staff before being released Immutable Storage, Network segmentation, Backup & DR processes in place and reviewed. Report taken to the Publica Shareholders in April, outlining a request for additional funding to increase staffing capacity / retention and investment in additional capabilities / technical solutions. CEs attending the meeting agreed in principle the funding and a follow up report finalising the financial requirements both in-year and going forward has been circulated for final sign off.

CRR-033	Leisure Services: It is unclear if numbers of users for Council's Leisure Centres will return to pre-covid lockdown levels. With reduced numbers and a fall in income, the 'Leisure' contractor may struggle to meet their obligations leading to a fall in service standards and reduced customer service.. Risk logged: January 2022 Risk Owner: S.151 Officer Responsible Officer: Publica Group Manager for Commissioning	4	4	16	Regular meetings with the Leisure Provider will identify any major issues that may affect service delivery, agree contingency measures and feedback to the Council The impact of Covid 19 on our leisure provider has been very significant and fully reported elsewhere within the Council The Council has been partially recompensed by the government for the loss of income during lockdown but there is still an ongoing financial risk to the council	4	2	8	4	2	8	→	14.01.22 Lower usage was seen in December as is traditionally the case, but usage recovery is comparable to the current national trend. It is unclear what affect further waves of the pandemic will have on the leisure service, but the effective cleansing and control measures implemented at the centres will remain in place. 17.03.22 Usage numbers are continuing to improve as consumer confidence builds within the industry and the provider is seeing a welcome boost in income. 06.06.22 Usage still below pre-pandemic levels but cost of living crisis may also be having an affect.
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Enable a vibrant economy													
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CRR-035	Business Grants and Council Tax Rebates: The Council is expected to undertake a further round of Business Grant Payments and Council Rebates. This will be quite extensive ensuring grant payments and rebates are applied correctly and verified. If there is a failure in how the applications are processed, this could result in a significant overpayment which may not be recovered from central government, creating a financial loss and reputational damage. Risk logged: January 2022 Risk Owner: S.151 Officer Responsible Officer: Publica Group Business Manager for Operational Services	5	3	15	Experience in payment of previous Covid Grants Verification process in place, including input from Counter Fraud Team Guidance expected from the NFI and Spotlight Comms to be published to manage expectations	5	2	10	4	1	4	↓	Working with Civica to get validated system for processing applications in respect of the Council Tax Rebate scheme. Although the likelihood is extremely low, with the extensive controls and scrutiny of payments, the significant sums involved means there will always be an element of risk to the Council.

Key to Officers

Risk Owner

S.151 Officer: Jenny Poole

Monitoring Officer: Angela Claridge

Chief Executive: Robert Weaver

Responsible Officer

Publica Group Finance Director: Frank Wilson

Publica Executive Director - Service Delivery: Sue Pangbourne

Publica Forward Planning Manager: James Brain

Publica Head of Legal Services: Susan Gargett

Publica Group Manager for Property and Regeneration: Claire Locke

Publica Group Manager for Communities: Andy Barge

Publica Group Manager for Business Services: Phil Martin

Publica Business Manager for Data and Growth: Stuart Rawlinson

Publica Data Protection Officer: Tony Oladejo

Publica Business Manager for Development Control: Phil Shaw