




Cotswold District Council Strategic Risk Register - November 2023

ID	Risk Title	Description of risk / opportunity	Risk Owner	Responsible Officer	Date reviewed	Initial Risk		Existing Control, Mitigation or Contingency	Previous Residual Risk Score			Current Residual Risk Score			Change in residual risk since previous review	Follow on Action (if required)	Responsible Officer	Target delivery date	Risk Acceptance Level	Status: Open, Hold, or Closed	Direction of Travel since previous review	
						Impact category	Likelihood category		Score	Impact category	Likelihood category	Score										
Internal Risks (IR)																						
CDC IR 1	Financial Stability of CDC	Government Funding declines putting financial sustainability at risk. Council cannot deliver services within current cost configuration or financial envelope. Members and Officers are not cognisant 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.	S151	S151	1/11/2023	Major	Probable	16	General Fund Reserves are currently healthy. 23/24 Budget updated to include known cost pressures. Budget monitoring in place throughout the year. Budget setting for 24/25 to identify additional opportunities and pressures. A Transformation Group has been established to drive further efficiencies forward. Local Government pay award for 23/24 now agreed and inline with budget assumptions	Moderate	Probable	12	Moderate	Probable	12	0	Continued in year budget monitoring and reporting. The 24/25 Budget to be collated and an updated MTFs to be reviewed by Executive and Council. Review of earmarked reserves. 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.	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	S151	BM - ICT	1/11/2023	Major	Probable	16	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 staff Data Protection Privacy notices in place. Data sharing agreements in place Data breach processes in place	Major	Possible	12	Major	Possible	12	0	All emails received from at risk location are quarantined and inspected by ICT staff before being released. Also see risk on cyber security. Currently rolling out new training programme for staff and members on data protection and cyber awareness.	BM - ICT	Ongoing March 2024	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.	CEO	BP - H&S	1/11/2023	Major	Probable	16	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. Ubico 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 Ubico where H&S is paramount.	Major	Remote	8	Major	Remote	8	0	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	BP - H&S	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	MO	ADs /BMS	1/11/2023	Moderate	Possible	9	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	6	Minor	Possible	6	0	Work ongoing to ensure we remain compliant with current legislation and future legislation. Project Plan in place to ensure we are compliant with Biodiversity Net Gain (BNG) which is now live from Jan 24	BM - Governance AD - Planning & Sustainability	March 2024 Feb 2024	Risk Acceptance & Retention	Open	
CDC IR 5	Shareholder Review of Publica	The review of Publica by Human Engine commissioned by the four shareholder Councils has been published at Cabinet with a recommendation to in-source the majority of services. This is subject to a detailed transition plan and financial costings. Staff have been informed through a briefing prior to the recommendation being published. If the detailed transition plan is not published soon providing assurance to those impacted by the decision, there is a risk that service delivery could be impacted due to loss of staff, inability to recruit, and low staff morale. 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 / efficiencies.	CEO	CEO	1/11/2023	Moderate	Possible	9	Report requires: A detailed transition plan to be developed for subsequent agreement by Cabinet and Council. Further due diligence to fully understand the financial implications of the recommendation in the short and long term.	Moderate	Possible	9	Moderate	Probable	12	3	Email setup for staff to raise questions about the announcement. Frequently asked questions to be developed and made available to staff. Work being undertaken on the data required to inform costings. Monitoring being undertaken to measure any impact to services / staffing impact. Officer working group to be established to deliver the transition plan. Joint messaging to be agreed to ensure staff are kept informed and to reduce flight risk and impact on morale. Governance arrangements to be agreed for the transition	CEO	Jan 24 - Transition Plan	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, reputational risk and financial implications	CEO	BM - Governance	1/11/2023	Major	Probable	16	BCPs in place for all service areas which are reviewed annually. BCP test completed in November 2022 and action plan completed.	Moderate	Possible	9	Moderate	Possible	9	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 currently on formal BCP training. Currently reviewing BIA and BCP form to ensure it is robust. Testing to be completed by Service Managers	BM - Governance	Complete June 24	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 meet its obligations under the Public Sector Procurement Regulations.	S151	BP - H&S	1/11/2023	Moderate	Possible	9	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	6	Moderate	Remote	6	0	Training being rolled out to all Managers on the new Commissioning & Procurement Strategy in new calendar year. Briefing note just circulated to all Business Managers and Assistant Directors	BP - Procurement	Apr-24	Risk Acceptance & Retention	Open	
CDC IR 8	Staff Resources	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 and increased cost	CEO	AD - Organisational Effectiveness	1/11/2023	Major	Possible	12	Recruitment team in place. Benefits package Branding IIP	Moderate	Possible	9	Moderate	Probable	12	3	Potential impact on recruitment & retention following recommendation to in-source majority of services back in-house. In response to this: Staff Communications Plan under develop FAQs Monitoring impact on recruitment & retention Transition Plan under development with partner CEOs	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.	CEO	S151	1/11/2023	Major	Possible	12	Controls in place to manage business critical risks and unknown risks such as pandemic / civil emergencies to help manage impact should these occur.	Major	Remote	8	Major	Remote	8	0		CEO		Risk Acceptance & Retention	Hold	

External Risks (ER)																						
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.	CEO	BM - ICT	1/11/2023	Extreme	Probable	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	Possible	12	Major	Possible	12	0	Cyber Ninja training currently being rolled out across the organisation, which 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. Cloudflare software now in place which provides further controls against hacking attempts. Cyber insurance now in place.	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	CEO	CEO	1/11/2023	Moderate	Possible	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.	S151	Head of CFEU	1/11/2023	Major	Probable	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. CFEU report to Audit & Governance Committee on a 6-monthly basis.	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 duties and 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.	CEO	BM - Governance	1/11/2023	Major	Possible	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	Locality response teams now in place to include locality leads, response teams and rest centre managers to add additional resilience to the emergency teams which are already in place through the wider Publica. All documentation is currently being reviewed. Additional funded resource secured by LRF to work across the County and to provide community resilience support.	BM - Governance LRF	March 2024 April 2024	Risk Reduction	Open	
CDC SR2	Climate Emergency	The Council has made a commitment to achieve countywide carbon neutrality as well as carbon neutrality for the Council's own services. Failure to achieve these targets could result in the Council not meeting its commitments, as well as risk in terms of cost of delivery if the Government does not provide funding for delivery of carbon targets	CEO	AD - Planning & Sustainability	1/11/2023	Moderate	Probable	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	Focused 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.	AD - Planning & Sustainability	Mar-23	Risk Reduction	Open	
CDC SR3	Local Plan /Housing	The Local Housing Plan 2011 - 2031 sets out the requirement for additional dwellings over the 20-year plan. This plan was reviewed in Sept 2023 by Cabinet with a requirement of circa 10,000 new dwellings. There is a risk that planning applicants and agents will not agree with the Councils position on housing requirements when applying for permission and the Council may be challenged on its position on the housing requirements through an appeal to a refused planning application.	CEO	AD - Planning & Sustainability	1/11/2023	Moderate	Possible	9	Local plan reviewed in Sept 2023. Local housing needs of the District have not significantly changed.	Moderate	Possible	9	Moderate	Possible	9	0		AD - Planning & Sustainability		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	CEO	Ubico CEO / BM Environmental Services	1/11/2023	Major	Possible	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 PR 2	Failure of Leisure provider and partnership 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.	CEO	BM - Leisure & Communities	1/11/2023	Major	Probable	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.	BM - Leisure & Communities	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	CEO	Publica MD	1/11/2023	Major	Possible	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 possible	9	Moderate possible	12	3	CDC Cabinet have approved the recommendations set out in the Human Engine report which was commissioned by all Shareholders of Publica. The report recommends that the majority of services are returned to the Council. Governance arrangements for the partnership will be reviewed as part of new model. Uncertainty around the delivery of savings targets through Future Publica with change in delivery model. Potential increase in risk around recruitment and retention during transition / change, which may impact on performance.	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.	CEO	CEO	1/11/2023	Moderate	Possible	9	Contracts and Service agreements in place Meetings in place with service providers	Moderate possible	9	Moderate possible	12	3	avid	CEO	Ongoing	Risk Reduction	open	
Major Project Risks (MPR)																				
CDC MPR 1	Failure to deliver CDC programme of major projects	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	CEO	AD - Property & Regeneration	1/11/2023	Major	Possible	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	12	3	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	

Likelihood

1	Improbable	Has not occurred before Has not occurred at other similar organisations Extremely unlikely to occur (less than 10% chance) but may do so in at least 10 years time
2	Remote	Remote risk but could happen within next 3 to 10 years Has not occurred in this company group but isolated cases have occurred elsewhere in similar organisations
3	Possible	Could happen at least once every 1 to 3 years New circumstances with little data to indicate likelihood of occurrence 50 / 50 chance of it happening
4	Probable	More likely to happen than not Could occur within next 3 – 12 months Has occurred in the last five years Has occurred at some other similar organisations
5	Almost certain	Has occurred in the last two years Has occurred at many other similar organisations More than an 80% chance of it happening Likely to happen within next three months or is occurring at present

Impact

1	Insignificant	Negligible impact on achievement of service objectives/delivery Negligible impact on delivery of project – slight slippage or reduction in quality/scope with no overall impact Negligible financial impact Health and Safety of very small number of individuals affected Limited impact on staff and culture – a few individuals only affected Minor legal/regulatory impact – no sanction or legal action likely No damage to reputation or will not result in adverse media comment
2	Minor	Moderate impact on service objectives/delivery – only partially achievable without additional resources Some impact on project – slight slippage against published milestones/targets and some 'nice to have' elements not possible Minor injuries possible to relatively small number of individuals Likely to affect motivation of small groups of staff Some legal/regulatory impact – could lead to warnings/threats of sanctions/ legal action Some public embarrassment but no damage to reputation or standing in the community Financial impact can be contained within service budget
3	Moderate	Service objectives/delivery not achievable without considerable additional time / resources Moderate effect on project timetable and significant elements of scope or functionality may not be available Moderate number of injuries possible – not life threatening Moderate impact on staff motivation within particular service(s) Significant legal/regulatory impact leading to reprimand, sanctions or legal action Some public embarrassment leading to limited reputational damage (adverse local press) – short term impact Financial impact cannot be contained within budget and needs additional resourcing.
4	Major	Significant impact on achievement of service objectives/delivery even with additional resources / infeasible project deadlines or projects fail to meet needs of proportion of stakeholders Possibility of serious injury or fatality to individuals Significant impact on employee motivation generally – possibly leading to poor quality services regarding safety inputs leading to sanctions or legal action with significant loss of community and public confidence in the service / company (of interest to the national press) Significant financial impact (>£250,000)
5	Extreme	Unable to achieve corporate objective or prolonged closure/withdrawal of service Major project's viability jeopardised through delay or level of quality makes it effectively unusable Possibility of multiple fatalities or serious injuries Severe impact on staff motivation generally, leading to dissatisfaction and industrial unrest Major legal/regulatory impact leading to sanctions or legal action with substantial financial or other consequences Highly damaging to reputation with immediate impact on public confidence Incident of interest to government agencies Incident potentially leading to resignation or dismissal of a Director Severe financial impact

Likelihood	5	5	10	15	20	25
	4	4	8	12	16	20
	3	3	6	9	12	15
	2	2	4	6	8	10
	1	1	2	3	4	5
		1	2	3	4	5
Impact						