CORPORATE RISK REGISTER Q3 DECEMBER 2019

No	Risk Description	Risk Causes	Risk Consequences	Inherent Risk Rating	Key Measures in Place to Manage The Risk (Key Controls)		ating Q3	Further Action & Implementation Date	Target Risk Rating	Risk Owner	Update & date
1	Failure to deliver a balanced budget 20/21 – 23/24	I .	Inability to set a legal budget Depleted Reserves Need to realise capital receipts Inability to deliver services to meet customer need/demand and expectations of the Council	16	 Review reserves strategically Robust monitoring of budgets by services and taking early remedial action where issues identified. Management Board action to limit spending where appropriate and communicate to staff on spending restrictions Bi-monthly financial reporting to Cabinet Monthly financial reporting to the Management Board Finance Away Days for Boards and HoS Bi-monthly meetings between LGSS Contract Managers and the S151 officer. Improved management reporting and KPI's. Cabinet/CMB awayday held 3rd October and 7th November 2019. 	12	12		4	CFO (S151)	Updated by CFO December 2019

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				<u>_</u>	(Rey Collifols)	19/20	19/20				
2	Projects may be instigated outside normal process where there is a lack of clarity around Member and	Members and Senior Officers roles (formulating and administrating policy	Significant decision-making with significant outcomes and impacts is not robust and is	20	Council Constitution (incl. the Member- Officer Protocol)	20	20	Implementation of Member-Officer Protocol audit recommendations following BDO review (by Mar 20)	12	Borough Secretary	Updated by Borough Secretary
1	Officer roles.	respectively) are not always clear			Cabinet reporting system						December
			processed by the organisation		Scheme of Delegation			 Provision of training on Member- Officer Protocol 			2019
	Reputational damage may occur should promises to the public by	•The culture does not resonantly	The intended outcomes and		- Generic of Delegation			(by April 20)			
	Members not be realised.	promote a separation of the	objectives of decisions are not		Contract Procedure Rules						
	inomboro not bo roundou.		achieved or are achieved in					Corporate training to Officers plus			
		members and officers	sub-optimal terms		EPB set up to aid interface between Members and Officers.			briefings to all staff to reiterate the standards to be enforced (by April 20)			
		Officers feel inhibited in giving	Maladministration occurs		Members and Officers.			standards to be enforced (by April 20)			
		full, objective, professional and			Weekly meeting with CMB and Cabinet to			Political skills training took place 17th			
		technical advice to Members in	The control environment is		discuss general updates and any potential			October.			
		charged political atmospheres	weakened and controls could		issues/gaps in information communicated.						
		Officers in their role seek to	be bypassed		Review of EPB terms of reference (Sept						
		frustrate the strategic choices,	Potential for reputational		2018)						
		policy and direction-setting of	damage and loss of public								
		Members	and stakeholder confidence		 Independent review by BDO as the internal auditors. 						
		Weak management of	Regulatory criticism		additors.						
		Members by leadership in the	,								
		past	Legal challenge may be								
			made and increased costs incurred								
I			Incurred								

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4	Inadequate succession planning, capacity and retention leading to service disruptions/non delivery Inability to meet and manage the demands of homelessness in the Borough	Salaries not competitive with LAs outside the local catchment area Reputation of the Council is not positive Perception of organisational instability Continual cost cutting Drift in staff morale Differing levels of engagement within the organisation Historic failure and disconnect of leadership to engage with staff Impact of unitary causing uncertainty Lack of HR strategic profile in the organisation Extension to Unitary launch 2020 to 2021 Significant increases in the numbers of people who are homeless Significant increases in the number of people in temporary accommodation (TA) Welfare reform, eg. extension of the benefit cap reducing	Inability to recruit to roles (particularly key roles) Inability to retain staff (particularly key talent staff) Depressed staff morale Increased staffing costs due to agency/interim costs Staff leaving (particularly key staff) take their organisational knowledge out of the organisation when they leave No succession planning is possible particularly around specialist and qualified posts Reduced organisational effectiveness and performance Lack of organisational resilience Increased demand leads to significantly greater costs for the Council Follow-on significant budgetary overspend occurs Pressure of financial impact of overspend of c£1.5m	20	 Recruitment process changed eg. to advertise more widely, use of dynamic job ads and increase use of specialised agencies to find permanent staff or fixed term applicants Benefit of council pension scheme headlined to attract staff Performance appraisal rewards highly effective staff Family friendly policies, eg maternity and paternity leave Generous holiday allowance Subsidised car-parking Guildhall location Flexible working hours Inflation pay rises provided Learning and Development strategy including succession planning in draft, due to be finalised Spring 2020 Rigorous budget monitoring in place Regular financial reporting to Management Board, Portfolio-Holder & Cabinet Budget increases 19/20 for service provision and improved staffing levels. 3/4/19 - Cabinet approved a 14 point action plan for reducing the use and cost of TA Further mitigate cost Strategy for procuring cheap accommodation 	19/20	19/20	 Review of staff Terms and Conditions (ongoing) Review of performance appraisal process (ongoing) A number of initiatives in wellbeing and communication being considered for deployment (On-going) Roll-out of Leadership Development Programme (On-going) Promote unitary as an opportunity for development CMB is considering all options to reduce the risk and any impact, CMB is being informed by views from MTUCM Uncertainty around Unitary may increase risk. Regular reporting on use of interims and spend to CMB CMB through OD & HR identifying risks and mitigations Further CMB/Cabinet review Jan/Feb 2020 - priorities and implication of unitary Recruitment of additional posts commenced October 2019 and is due to be completed January 2020 Implemented property acquisitions scheme (initially for 30 properties) to provide extra 'settled' housing for homeless households. Developing business case for 	9	CFO (S151) Head of Housing	Updated by CFO December 2019 Updated by Head of Housing December 2019
		affordability of housing • Households loss of private rented accommodation • Difficulty in accessing private rented accommodation • Shortage of social rented housing • Homelessness Reduction Act increasing use of TA	More homelessness applications Increased statutory duty to rehouse Increases of numbers of people in BB and TA accommodation		- Slow demand • Fortnightly meetings of multi-disciplinary TA Action Plan Implementation Group • Restructure of Housing & options team Consultation completed August 2019. Restructure focussed on increasing management capacity, homelessness prevention and more effective management of homelessness and TA			purchasing up to 120 apartments (in two office block conversions) for use as temporary accommodation			

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5	Failure to manage, deliver or expose new risks as result of poor project management practice. Reputational damage possible.	Lack of a clearly-defined project management governance structure Lack of written procedures and related compliance as a source of assurance Inadequate checks and balances Inadequate project documentation maintained - business cases in particular	Wrong decisions made on an unviable business case Continual review of projects stopping unviable projects Reputation Financial costs Pressure on resources Pay back on investment funds if not delivering	16	 Gateway reviews conducted and reported to CMB for approval More robust governance processes (as per above risk on governance) Completion of Project Management Framework document Highlight reports reported monthly to CMB Project Managers are made accountable for reporting issues and risks to the Head of Economy, Assets and Culture Review of project management documentation to simplify and make it easier for reporting purposes (April 2019). 	12	12	Continue to develop and install more robust governance processes (Ongoing)	4	Economic Growth & Regeneration Manager	Updated by Economic Growth & Regeneration Manager December 2019
6	Legal obligations under the Data Protection Act 1998 (and also the superseding GDPR EU Regulations in 2018) are breached and there is inappropriate access and/or disclosure, corruption or loss of data	Not implementing the new EU data protection legislation Lack of staff knowledge of policy and procedure Ineffective implementation of GDPR Regulation requirements Lack of an implementation plan for GDPR	Data breaches Prosecution Fines Lack of confidence and public trust Reputational issues Member criticism	20	 Data sweeps Data governance Staff awareness Campaigns/refresher online training Data Protection Policy update May 2018 Follow up actions and lessons learnt communication to all staff through newsletters/all staff emails GDPR implementation plan in place Inclusion within re-launched corporate induction BDO Internal Audit review (June 2019) 	9	9	Continue with training on GDPR refresher courses for officers and members (ongoing) e-learning module available to all staff review and update of all policies and procedures (ongoing) Implement improved management of data storage (ongoing) Data audits (ongoing)	3	Governance & Risk Manager	Reviewed by Governance & Risk Manager December 2019

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7	There are no clear plans for improving the economic prosperity and regeneration of Northampton.	Lack of local knowledge LGR creates political uncertainties	Investors not investing in the town or pulling out of partnership arrangements Jeopardising current and future regeneration and growth projects Damage to Northampton as a place of choice	16	 Lessons-learned reviews being held Improved reporting through to CMB and EPB Plans being developed in terms of QA and process and service capability in structure Town Centre Masterplan developed by 'Northampton Forward' and adopted by The Council in October 2019. Development of growth team 	8	8	Delivery of Economic Growth Strategy (April 2020) Expression of interest for Government Town Centre Fund successful with full business case being developed for an April 2020 submission Further development of growth team	2	Economic Growth & Regeneration Manager	Updated by Economic Growth & Regeneration Manager December 2019
8	NBC fails to manage its contractual partnerships with: • LGSS • NPH • Veolia	Loss of direct management control over activities Poor governance Lack of contract monitoring at officer level Lack of quality control Performance monitoring information is not developed Poor contract specification and understanding LGSS Services and structure review by owners	Services not delivered to quality, time and cost Failure in fulfilling legal responsibilities Hindering the achievement of the councils objectives Negative impact to customers and stakeholders reputational risk to NBC Drop in services from LGSS	12	Taking remedial action where required e.g. HR and Payroll coming back in-house Quarterly reports and meetings	9	9	robust contract monitoring and quality control Continual review of LGSS contract Holistic/virtual team of contract managers to share good practice Internal audit report confirms adequate processes Regular discussions with LGSS MD/NCC S151/MK S151	8	CFO (S151)	Updated by CFO December 2019

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9	Major or large scale incident (accident, natural hazard, riot or act of terrorism) business interruption affecting the council resources and its ability to deliver services and risk to safety of staff and loss of staff	interruption		20	Updated business continuity strategy and business continuity plans partially in place with some services remaining outstanding Refreshed Critical Incident Plan Emergency Planning Work-streams facilitated by Emergency Planning lead including town centre evacuation procedures Establishment of Gold and Silver duty rota Review of high-rise buildings in the borough post-Grenfell On-going improvements identified and implemented as a result of participation in national and local exercises eg Cygnus (flupandemic) and Jerboa (flooding) exercises Involved in London Bridge preparedness Incident room manual reviewed and updated October 2019 Request for further nominees for EP roles circulated September 2019 Further training for emergency planning volunteers organised for October 2019	12	12	Continuing work to ensure all services at the Council put in place a business continuity strategy and plan (On-going) Continuing improvements to BC and Emergency Planning procedures to be implemented post operations e.g. 2018 Floods (on-going) Clarify arrangements for business continuity responsibility for key partner organisations (On-Going) Identification and risk assessments of reception centres (On-going) London Bridge Protocol updated October 2019 London bridge exercise 17th December 2019	9	CEO	Governance & Risk Manager December 2019
10	Impropriety or improper business activities leading to fraudulent activity or malpractice	LGSS services returning - HR and Payroll - shifting accountabilities Lack of robust governance, procedure or process Lack of robust internal controls Inadequate reviews by internal audit on financial controls No assurance from LGSS on effectiveness of controls	Avoidable financial loss Criminal prosecution Civil litigation Fines Lack of confidence from staff or public Reputational damage Member criticism	15	 Counter-fraud strategy in place NBC Fraud policy in place Section 151 controls Review of policy and procedure Review of LGSS Finance SLA and process Whistleblowing Policy approved by Council New suite of KPI's developed NBC fraud policy updated October 2019 	16	16	Quarterly balance sheet reviews of financial controls within LGSS Continued assurance of controls through bi-monthly contract management meetings with LGSS Targetted use of internal audit (BDO) in risk areas/services	10	Governance & Risk Manager	Updated by Governance & Risk Manager December 2019

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				Inhe	(Key Controls)	Q2 19/20	Q3 19/20		Tar		
11	Significant decisions made at Council and Cabinet level are not sufficiently robust leading to ill	Inadequate governance Inadequate checks and	Civil litigation, including judicial review	15	Additional/Increased cabinet clearance protocols in place	12	12	Completeness now a higher indicator than recorded date.	10	Borough Secretary	Updated by Borough secretary
	informed decisions being made.	balances	Lack of confidence from staff or public		Reworked clearance processes			Recruitment of additional staff members in Democratic Services			December 2019
			Court cases		 EPB Officer/Member interface in operation to ensure greater understanding prior to cabinet/council meetings 			January 2020. • Workshop to be arranged with staff in			
			Ombudsman reviews		Cabinet reports cleared by CMB			legal and democratic servicesto renew the cabinet clearance process			
12	Inability of IT to service future requirements and or loss of IT due to failure or cyber-attack	Poor governance Lack of contract monitoring	Services not being delivered to customers	15	 Review of current LGSS SLA with IT to see what can be improved and remedial action taken 	10	10	ICT Governance Meetings (On-going)	10	CFO (S151)	Reviewed by CFO December 2019
		Lack of quality control	Business interruption Inefficient business		IT policies and procedures reviewed and refreshed			ICT Client Meetings to assess relationships and risks (On-going)			
		Increased external cyber attck numbers and complexity	processes and technology not adequately exploited		Review of IT equipment and infrastructure			LGA stocktake results action plan implementation and ongoing work - 76%			
					PSN Compliance achieved			completed as at 30/11/19			
					Lessons-learned review implemented following ransomware attacks in 2016/17						
					LGS Cyber self assessment completion completed October 2019						
					 Cyber attack exercise 26th July 2019 to test staff and systems with a positive outcome 						

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				Inherent	(Key Controls)	Q2 19/20	Q3 19/20		Targ		
13	There is non-compliance with fire	Lack of a clear strategy	Continuing lack of a clear	20	Corporate Health & Safety Group set up	9	9		6	Governance & Risk	Updated by
	and Health and Safety legislation.	Processes not followed	strategy /strategic direction		and in place			 Communication and engagement with staff through information/training 		Manager	Governance & Risk Manager
					 Upskilling of managers in terms of H&S 			sessions (On-going)			December
		Audits and inspections not	Death or injury to public or		responsibilities						2019
		completed in a timely manner	staff		Audit & Inspection Framework in place			 Continued progress with H & S audits and inspections 			
		Recommendations not	Criminal prosecution or civil		Addit & Inspection Framework in place			and inspections			
		escalated or followed up by	litigation		H&S Matrix in place cross-referencing role			Active engagement through H & S			
		service areas			profiles to required H&S training			Committee of management, H & S			
			Service stopped		Review of H&S policies and procedures			Officers, staff and TU's.			
			Loss of public trust		and refreshed where appropriate						
					Refresher staff comms and training						
			Action by H & S executive or		Fire Marshal training completed						
			Northants Fire and Rescue		Implementation of mandatory on-line training accurace for all staff						
			Fines to organisation		training courses for all staff Corporate Health Safety and Wellbeing						
			I mee to ergameation		Policy presented to Council and signed off						
			Corporate manslaughter		on 9th July 2018.						
			charges		Creation of a H & S Committee						
			Insurance claims		Restructure of the H & S delivery and service (2018)						
					Mandatory e-learning modules						
			Financial loss								

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	Safeguarding arrangements are not adequate to protect or address concerns of vulnerable adults and children.	Staff lack of awareness of procedure or referral route	Children or vulnerable adults harmed or put at risk of harm Criminal prosecution or civil litigation Seriously damaging reputation or NBC		 Procedures and referral routes reviewed and refreshed where necessary Refreshed procedures and referral routes communicated Designated Officer for Safeguarding as point of contact in place Series of presentations on CSE, including with Members and staff, to build awareness Increased joint working with County Council (Rise Team), other boroughs and districts, including with community safety. licencing and social landlords Scrutiny Review of CSE in the Borough Scrutiny Review gone to Cabinet Established an NBC officer group for tackling CSE. Commenced implementation of recommendations arising from the above Cabinet report (June 2019) Response to scrutiny review (December 2018) Identification of a Safeguarding Champion within each service area (June 2019). 	9	9	Implementation of key audit recommendations from Safeguarding audit (December 2019) Development of a programme of elearning training for staff (January 2020) BDO audit due March 2020	9	Head of Housing	Updated by Head of Housing December 2019
5	Failure to deliver enough new housing to meet targets and needs	Local housing market housebuilders not wanting to devalue their product by flooding the market increasing land values Scarcity of experienced trades people and of materials.	Not delivering enough housing to meet local demand Increase in homelessness and demand for temporary housing Failure to meet local targets Failure to meet Housing Delivery Test resulting in increased targets Potential loss of decision making role Inability to resist housing proposals in unsustainable locations	16	 Secured Planning Delivery Funding to recruit Housing Delivery Manager to liaise with housebuilders and establish what is delaying delivery Regular monitoring of local and market area delivery Flexible approach to planning applications Investigating investment in infrastructure to open up allocated sites and accelerate delivery Development of a Growth Deal to secure additional resources for affordable housing, infrastructure and capacity, and planning freedoms Promotion of role within Growth Corridor Cabinet approval of £4.2m Dallington relief road September 2018. HRA cap lifted. Limitation now is capacity to deliver and the sites available. 	9	9	Re-focus the Housing Delivery project to develop the Strategic Plan evidence base. Issues and options consultation has taken place (Dec 2019) and will be reported in January 2020 Discussing Growth Package with MHCLG as part of Central Area of the OxCAm Growth Arc, including infrastructure funding to accelerate existing and future housing and employment opportunities. (Ongoing)	9	Head of Planning	Updated by Head of Planning December 2019

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16	REMOVED Q3 2018: LGR risk, to be included within the main LGR project risk register										
17a	Impact of Brexit on NBC services.	Brexit deal/no deal	Has a direct impact on NBC services directly	4	Monitoring Brexit information Continual CMB checking on services/staffing 2 hour training for all of CMB in Jan/Feb 2019 Brexit lead for NBC identified Creation of a dedicated Brexit Risk Register	4	4	Regular Government and Regional updates Engagement with MHCLG re Brexit regular calls throughout September/October 2019 Weekly brexit bulletins Engagement with LRF training in September 2019	4	СМВ	See Brexit risk register
17b	Impact of Brexit on Northampton economy.	Brexit deal/no deal Uncertainty of timing of Brexit	Supply chain and people impact on businesses Economic impact drives up benefit claims	6	Monitoring Brexit information Continual CMB checking on services/staffing 2 hour training for all of CMB in Jan/Feb 2019 Brexit lead for NBC identified Creation of a dedicated Brexit Risk Register	6	6	Regular Government and Regional updates Engagement with MHCLG re Brexit regular calls throughout September/October 2019 Weekly brexit bulletins Engagement with LRF training in September 2019	6	СМВ	See Brexit risk register
18	NEW RISK: Climate change: Failure to comply with: a) the Climate Change (2008) Act to reduce carbon omissions below 1990 levels by 2050. b) Making the Borough carbon neutral by 2030	Low resources Rapid and large scale changes to operations outside NBC's control	Contributing to the decline in short term changes to the climate	9	Engagement with other local authorities in the quarterly 'Climate Change Strategy Group'	n/a	9	Baseline report to Council in January 2020 Strategic approach and policy to Cabinet February 2020	4	Head of Planning	Updated December 2019
19		Collapse of LGSS as an entity LA's are requested to repatriate the services provided by LGSS i.e. finance, insurance, procurement, IT	Impact on ICT Impact on finance/budgets Year end accounts Procurement Staffing challenges	6	Monitor LGSS performance quality/volume Turnover of key LGSS staff	n/a	6	Regular discussions with LGSS MD/NCC S151/MK S151	6	CFO (S151)	Added December 2019