

## CORPORATE RISK REGISTER SUMMARY

Corporate risks: risks that could influence the successful achievement of our long-term core purpose, priorities, and outcomes. These are:

1. Risks that could potentially have a council- wide impact and/ or
2. Risks that cannot be managed solely at a Service Area Level because higher level support or intervention is needed.

HIGH RISKS							
CRR REF	DIRECTORATE OR SERVICE AREA	RISK AREA	Gross Risk Level (Risk is Likelihood x Impact)	Net Risk Level (Risk is Likelihood x Impact)	Last Review Date	Change in Net Risk Level	Risk Owner
<a href="#">CRR1- B</a>	Housing/ Finance	Balance of Housing Revenue Account	16 (4X4)	12 (3X4)	CLT Performance Board: 15 October 2024	→	Tony Baden/ Richard Tomkinson
<a href="#">CRR7</a>	All Directorates	Climate Change	16 (4X4)	16 (4X4)		→	Philippa Dart/ Joe Russell- Wells
<a href="#">CRR10</a>	Growth	Planning Policy & Conservation- Development Plan	12 (3X4)	12 (3X4)		→	Karl Roberts/ Neil Crowther
<a href="#">CRR11a</a>	All Directorates	Major Project- Alexandra Theatre	16 (4X4)	16 (4X4)		→	Karl Roberts
<a href="#">CRR11c</a>	All Directorates	Major Project- Bognor Regis Arcade	12 (3X4)	12 (3X4)		→	Karl Roberts

MEDIUM RISKS							
CRR REF	DIRECTORATE OR SERVICE AREA	RISK AREA	Gross Risk Level (Risk is Likelihood x Impact)	Net Risk Level (Risk is Likelihood x Impact)	Last Review Date	Change in Net Risk Level	Risk Owner
<a href="#">CRR1-A</a>	All Directorates	Financial Resilience	12 (3x4)	8 (2x4)	CMT Performance Board: 15 October 2024 Additional Risk: 18 June 2024	→	Tony Baden
<a href="#">CRR2</a>	All Directorates	Organisational capacity and transformation	12 (3x4)	9 (3x3)		↓	Dawn Hudd
<a href="#">CRR4.1</a>	All Directorates	ICT- Major successful cyber-attack	16 (4x4)	8 (2x4)		→	Jackie Follis
<a href="#">CRR4.2</a>	All Directorates	ICT- Physical or technical failure	8 (2x4)	6 (2x3)		→	Jackie Follis
<a href="#">CRR5</a>	All Directorates	Corporate Business Continuity	12 (3x4)	9 (3x3)		→	Philippa Dart/ Joe Russell- Wells
<a href="#">CRR6</a>	All Directorates	Information Governance and Data Protection	9 (3x3)	4 (2x2)		→	Daniel Bainbridge
<a href="#">CRR8</a>	All Directorates	Corporate Health and Safety	12 (3x4)	8 (2x4)		→	Nat Slade
<a href="#">CRR9</a>	All Directorates	Equality, Diversity and Inclusion	12 (3x4)	8 (2x4)		→	Jackie Follis
<a href="#">CRR11b</a>	All Directorates	Major Project- Littlehampton Seafront Project	12 (3x4)	8 (2x4)		→	Philippa Dart

<a href="#">CRR12</a>	Homelessness	Increased Homelessness	16 (4x4)	9 (3x3)		→	Richard Tomkinson
<a href="#">CRR14</a>	Housing Repairs	Compliance Failings	4 (1x4)	4 (1x4)		→	Richard Tomkinson
<a href="#">CRR15</a>	Housing	Ineffective Complaints Management	9 (3x3)	4 (2x2)		→	Richard Tomkinson
<a href="#">CRR19</a>	All Directorates	Littlehampton Harbour Board	16 (4x4)	8 (2x4)		→	Nat Slade/Tony Baden/Philippa Dart

**CORPORATE RISK REGISTER- ENTRIES REMOVED (COPIES AVAILABLE UPON REQUEST)**

<b>CRR REF</b>	<b>DIRECTORATE OR SERVICE AREA</b>	<b>RISK AREA</b>	<b>Gross Risk Level (Risk is Likelihood x Impact)</b>	<b>Net Risk Level (Risk is Likelihood x Impact)</b>	<b>Last Review Date</b>	<b>Change in Net Risk Level</b>	<b>Risk Owner</b>
CRR18	Finance	Housing Benefit Subsidy	12 (3x4)	4 (1x4)	REMOVED November 2023		Tony Baden
CRR4.3	All Directorates	ICT- Permission to access government systems.	12 (4x3)	6 (2x3)	REMOVED 16 April 2024		Jackie Follis
CRR16	All Directorates	Chief Executive resignation/ vacancy	16 (4x4)	4 (1x4)	REMOVED 18 June 2024		Karl Roberts/ Philippa Dart
CRR13	Housing	Housing Management System Implementation	12 (3x4)	6 (2x3)	REMOVED 20 August 2024		Richard Tomkinson
CRR17	Growth (ORR 54)	Disabled Facilities Grant	4 (1x4)	4 (1x4)	REMOVED 20 August 2024		Nat Slade
CRR4.4	All Directorates	ICT- Document Management System Support	16 (4x4)	8 (4x2)	REMOVED 20 August 2024		Jackie Follis
CRR4.5	All Directorates	ICT- Planning, building control and Land Charges System supplier support	16 (4x4)	8 (4x2)	REMOVED 20 August 2024		Jackie Follis

## CORPORATE RISK REGISTER

<b>CRR1- B: Balance of Housing Revenue Account (HRA)</b>	<b>HIGH</b>
<b>Risk Owner:</b> Tony Baden/ Richard Tomkinson	<b>Last updated:</b> 15 Oct 2024
<p><b>Risks Identified</b></p> <ul style="list-style-type: none"> <li>• HRA reserves and balances have consistently reduced since 2021/22 to now unsustainable levels. Current balances are below the target level of £2m.</li> <li>• National pressures and high HRA operating costs have increased the risk of further HRA deficit in year.</li> </ul>	
<p><b>Causes</b></p> <ul style="list-style-type: none"> <li>• Increased supply cost and inflationary pressures.</li> <li>• Historically high Supervision and Management and Repairs and Maintenance costs within the HRA.</li> </ul>	
<p><b>Effects</b></p> <ul style="list-style-type: none"> <li>• HRA Reserves and Balances have effectively been reducing since 2021/22 and are now at critical levels</li> <li>• Financial loss to the Council, and reputational damage</li> <li>• Impacting the scope to which current housing services can be improved</li> <li>• Limiting the delivery of future developments in housing such as new build.</li> </ul>	
<p><b>Existing controls/ mitigating actions</b></p> <ol style="list-style-type: none"> <li>1. Insourcing repairs Contract: The Council has in-sourced the repairs contract from external providers Osbournes. It is anticipated that this will deliver substantial net saving to the HRA (£0.7m). Housing in partnership with Finance are closely monitoring all aspects of repairs to ensure the savings are delivered and that there is evidence to support this.</li> <li>2. Improving Financial Management and Control within the HRA: A dedicated Project Accountant has been appointed (June 2024) to strengthen and support the HRA with Financial Management and Business planning: Programme of work includes:             <ol style="list-style-type: none"> <li>a. Implementation Monthly Financial Reporting to CLT in relation to the HRA, with the focus on a risk-based approach.</li> <li>b. Improving budget monitoring to ensure responsibility and accountability sit with HRA Budget Holders. There will be ongoing training and development with the department to deliver this.</li> <li>c. Delivering monthly Finance / Housing workshops, covering areas such as Debt Management/Repairs Forecasting/Capital Revenue Split/Business Planning/MTFP budget Setting/Use of RTB receipts</li> <li>d. Improving Month End Process: Ensure there are robust and accurate month end procedures particularly in relation to the E5, particularly in relation to Rents/Rent Debt, Repairs and delivery of savings, Salaries, and Voids management. The aim is to ensure there is one version of the truth.</li> <li>e. Improving Stakeholder management: Ensuring key stakeholders are engaged with HRA financial Management and control through: Monthly Finance budget holder surgeries, Regular workshops on Finance issues, Engaging and updating CLT/Members, ensuring the Business Plan is live and up to date, and engagement and ownership of HRA savings programme.</li> <li>f. Improving HRA Policy and Procedures: The short-term focus will be on Debt management procedures and policies particularly in relation to Current Tenant</li> </ol> </li> </ol>	

Arrears (CTAs). Further areas of review will be Voids, Repairs, and Capital vs revenue split.

g. Technical Accounting Issues: Ensuring full adherence to CIPFA Service reporting accounting code of practice (SERCOP) in relation to the HRA. Note any changes in methodology will be subject to External Audit review and opinion.

3. Refresh and Update of HRA 30 Year Business Plan. This has been completed and will be reported to the Housing and Wellbeing committee in November 2024. Further it will also be used to support the HRA MTFP process for 25/26 and the delivery of the refreshed Housing strategy.
4. Systems integration efficiencies: The HRA business improvement team in partnership with Finance will ensure the Housing Management system (CX) is fully integrated with the financial information system (E5) and the organisation is maximising use of IT and its interfaces to improve budget control and management.
5. Workstream Re-alignment  
Work is underway to re-align resources within Housing Services to focus on current and future operational and strategic challenges, including dedicated resources for income maximisation/arrears recovery.

#### Further Actions

Action	Target date
1. De-pooling Service Charges: A programme of development work will be led by HRA business improvement team and finance. The current plan for Phase 1 has been agreed: The focus will be on recharging for services provided to tenants and leaseholders by utilising the service charge module in Civica. The timeline is estimated to be 9 months with a goal of introducing De pooled services charges in 25/26 financial year. Note the impact of de-pooling will be reflected in 25/26 HRA budgets, with an on-going resource requirement (increase in established expenditure) on a spend to save basis.	Feb 2025

RISK SCORING	Likelihood	Impact	TOTAL	Change in Net Risk Level
Gross Risk Level	Very Likely (4)	Very High (4)	16	➔
Net Risk Level	Likely (3)	Very High (4)	12	
Target Risk Level	Possible (2)	Very High (4)	8	

**REVISED ENTRY**

<b><u>CRR7: Climate Change</u></b>	<b>HIGH</b>
<b>Risk Owner:</b> Philippa Dart/ Joe Russell- Wells	<b>Last updated:</b> 15 Oct 2024
<b>Risks Identified</b> <ul style="list-style-type: none"><li>• Failure to make the activities of the Council carbon neutral by 2030.</li><li>• Failure to complete/ achieve the actions detailed in the Council's Climate Action and Biodiversity Work Plan 2022- 2023.</li></ul>	
<b>Causes</b> <ul style="list-style-type: none"><li>• Increased severity of global warming caused by continued use of carbon.</li><li>• A lack of understanding, resource allocation, and commitment to achieving climate change goals, through both officer actions and members vote.</li><li>• Slow take- up of energy saving measures e.g. green/ renewable tariffs, smart meters, installation of PV etc.</li><li>• Increase of sustainable energy costs verses carbon energy in short term.</li><li>• Inadequate level of sustainability required in proposal/ approved developments.</li><li>• Inadequate level of sustainability required in the Councils procurement process, for both purchased goods and services.</li><li>• Slow development of Government led policies for home/office energy standards, including for new developments and retrofit projects.</li><li>• Lack of financial support through relevant and applicable Government funding/grants.</li></ul>	
<b>Effects</b> <ul style="list-style-type: none"><li>• Increased likelihood of extreme weather (hot and cold) and flooding (coastal, fluvial and surface) impacting vulnerable residents, properties and staff.</li><li>• Extreme weather impacting the delivery of day-to-day services and damaging properties, both residential and cooperate. In turn an increased budget required for regular repairs of these damages.</li><li>• Detrimental impact on the local environment, including a significant reduction or loss in biodiversity and ecosystem stability.</li><li>• Continued reduction of air quality and resident health through emissions associated with petrol/diesel fuelled transport.</li></ul>	
<b>Existing controls/ mitigating actions</b> <ul style="list-style-type: none"><li>• Prioritisation of climate change in council activity, including within the Vision and the production of a Climate Strategy and Climate Change and Biodiversity Work Plan.</li><li>• Increased national awareness and drive for change including Member desire to progress climate change agenda. Continued annual monitoring of Scope 1, 2 and 3 emissions in line with greenhouse gas protocols and guidance. Update reports will be taken to Policy and Finance in late 2024 and early 2025 showing emission monitoring and updates to the Climate Action and Biodiversity Work Plan.</li><li>• Work has been completed around a procurement 'deep dive' with final documentation issues to officers. This work included extensive analysis and review of procurement emissions and suggested steps that need to be taken to reduce this. Officers have begun to take forward this work.</li><li>• Development of climate related training for officers (mandatory) and members. This will include an introduction to climate change and sustainability, emissions and what the Council aims to do and is doing to reach the 2030 carbon neutral target.</li><li>• Provision of Carbon Literacy training at a senior level (including director and group heads, along with managers) to help start behavioural change within the Council. Further training has been carried out through the 23/24 . A cohort targeted an elected members has also</li></ul>	

been undertaken. A budget for additional carbon literacy training has been included for the 24/25 FY, however CLT will need to encourage staff update due to a sharp reduction of attendance over time.

- Arun become a Bronze certified Carbon Literate organisation in 2023, requirements to become Silver are being reviewed and it is hoped that the Council will become Silver in the future. Due to recent changes in requirements this now requires 30% of staff to be certified.. If CLT are able to support the uptake of officers to this training Arun will be able to become silver certified in the future.
- Engage with Sussex Bay and Kelp Restoration projects.
- Work has been completed to undertake feasibility studies on a selection of key buildings for the Council. This will help inform next steps and be essential in applying for future funding opportunities, such as the LCSF and PSDS. At this current time this includes building audits for the Civic Centre, Bognor Town Hall, Arun Leisure Centre, along with a heat decarbonisation plan for Arun Leisure Centre. Future work is being considered to undertake feasibility studies for other sites.
- Support to be provided to suppliers and contractors, as well as local SMEs, businesses and companies around emission reduction and procurement changes. Additionally, following on from the climate action day for Town and Parish Council's (which took place on 6 June 2024), future events are also being considered. It is hopeful that a network can be set up for best practises to be shared amongst T&Ps within Arun.

More information can be found on the [Council's climate change website](#).

### Further Actions

Action	Target date
A motion was put forward around examining the concept and feasibility to establish a mechanism of advocacy and improved protect for the River Arun. This is currently being explored by officers and work is being undertaken to explore what the impacts would be for Arun to take this forward. Where possible a joint up approach will be taken with other D&Bs and the relevant River Trusts- this is going to the Environment Committee in September 2024.	
Offsetting is an important step in reaching carbon neutral/net zero targets. Though the Council will be doing everything possible to reduce emissions it is likely that some emissions will remain. To allow the Council to reach this target offsetting options have started to be considered.	

RISK SCORING	Likelihood	Impact	TOTAL	Change in Net Risk Level
Gross Risk Level	Very Likely (4)	Very High (4)	16	→
Net Risk Level	Very Likely (4)	Very High (4)	16	
Target Risk Level	Likely (3)	High (3)	9	



<b>CRR10: Planning Policy and Conservation (Local Plans Team)</b>	<b>HIGH</b>
<b>Risk Owner:</b> Karl Roberts/ Neil Crowther	<b>Last updated:</b> 15 Oct 2024
<b>Risks Identified</b> <ul style="list-style-type: none"> <li>• Not having an up-to-date Development Plan, guidance and a supporting evidence and monitoring framework.</li> </ul>	
<b>Causes</b> <ul style="list-style-type: none"> <li>• Key staff vacancies not filled/insufficient capacity and experience.</li> <li>• <del>Unmanageable workload.</del></li> <li>• Competing work priorities within the policy team.</li> <li>• Member decisions to pause/postpone.</li> <li>• National Policy changes.</li> <li>• <del>Failure of budget management/project planning.</del></li> <li>• Difficulties in adhering to project plan through contract management with appointed lead consultant and co-ordination of required evidence and decisions</li> </ul>	
<b>Effects</b> <ul style="list-style-type: none"> <li>• Non compliance with Local Development Scheme – Local Plan update.</li> <li>• Failure to deliver Neighbourhood Plan preparation/updates.</li> <li>• The above would result in failure to have a 5-year land supply in place which would render certain polices out of date and trigger the presumption in favour.</li> <li>• Failure under Housing Delivery Test. This does not place an additional burden as the presumption would already apply without a 5 year land supply.</li> <li>• Risk of Plans being prepared by Government intervention.</li> <li>• <del>Policy Framework out of date and decision making at risk of appeal and costs.</del></li> <li>• Additional budget needed to cover additional National policy requirements.</li> <li>• Legal costs (Appeals and JR) of failure to comply with national planning legislation.</li> <li>• Developments will be granted on appeal at an ever-increasing rate leading to reactive rather than proactive planning. Smaller sites not allocated in Plans would come forward and be difficult to resist. Opportunity for joined up infrastructure would be significantly reduced.</li> <li>• Insufficient evidence commissioning to support plan making.</li> <li>• Inability to progress important work on matter such as biodiversity, climate change or infrastructure (for example). These matters will be contained in future planning policies and betterment will only be secured when policies are adopted.</li> <li>• Abortive work/costs.</li> </ul>	
<b>Existing controls/ mitigating actions</b> <ul style="list-style-type: none"> <li>• More proactive engagement with Members. A need for more regular and detailed meetings to discuss issues and implications.</li> <li>• Clear project plan to be prepared and adhered to.</li> <li>• Regular team meetings specifically on Local Plan update and Neighbourhood Plan to review progress and to identify any difficulties arising with a view to finding solutions.</li> <li>• Full use of Neighbourhood Planning grant.</li> <li>• Ensure statutory consultation stages are achieved and compliant.</li> <li>• Ensure that consultant is appointed to lead on Plan preparation as a matter of urgency.</li> <li>• Ensure that a resource is secured to cover for the three vacant posts in the Policy team.</li> <li>• Project Initiation Document in respect of the Local Plan completed and subject to regular review. Last reviewed in August 2023.</li> </ul>	

**Further Actions**

Action	Target date
Political commitment must be sought and agreed <del>on the back of these meetings</del> . Full Council agreed to proceed with review of Local Plan in July 23.	Ongoing
Develop/monitor Recruitment Strategy and call off contract support for output deliverables. Proposed outsourcing of preparation of Local Plan. It was agreed at Committee in July 2023 that a large proportion of the Local Plan preparation can be outsourced. Progress on commissioning has been exceptionally slow and we have yet to be able to send out a brief for this work. Following an identification of a specific resource to progress this, this has made more progress and should be issued in September 2024.	Jan 2025
This is now complicated further by the Policy Team Leader that he is leaving on 5 June 2024. Further, s Senior Officer in the team has also left. That means that a team that had seven policy posts a year ago, would now only have three staff in these posts. An interim Team Leader has been secured and is expected that progress will increase as a result. A recruitment into the Senior role has also commenced.	Nov 2025
Political ‘buy in’ to the Plan preparation process is going to be exceptionally difficult to secure and this has been made even more difficult by the new governments proposed changes to Planning. Even with an extensive programme of briefings and workshops with members being scheduled during the Plan preparation process, there is still going to be a very difficult political decision to take at a time when there will be local elections forthcoming.	Ongoing
Further regular benchmarking – monitoring and review.	

RISK SCORING	Likelihood	Impact	TOTAL	Change in Net Risk Level
<b>Gross Risk Level</b>	Likely (3)	Very High (4)	12	
<b>Net Risk Level</b>	Likely (3)	Very High (4)	12	→
<b>Target Risk Level</b>	Possible (2)	Very High (4)	8	

<b>CRR11a: Major Project- Alexandra Theatre</b>	<b>HIGH</b>
<b>Risk Owner:</b> Karl Roberts	<b>Last updated:</b> 15 Oct 2024
<b>Risks Identified</b> <ul style="list-style-type: none"> <li>• Failure to regenerate coastal towns within the district.</li> <li>• Failure to deliver major projects in line with funder requirements meaning funding is withdrawn.</li> <li>• Insufficient resources to deliver vision and aspirations for the district.</li> <li>• Delays to the delivery of the project</li> </ul>	
<b>Causes</b> <ul style="list-style-type: none"> <li>• Lack of funding to deliver major projects.</li> <li>• Decisions not made swiftly enough.</li> <li>• Lack of public/ partnership acceptance of, and buy-in to strategies.</li> <li>• Multiple major projects running simultaneously- resources stretched.</li> <li>• <del>Impact of growth of Butlins and Chichester University influencing local market conditions.</del></li> <li>• Other Council borrowing priorities/ increase in PWLB rates.</li> <li>• Further uncertainty over availability of Council and external funding in the future.</li> <li>• Inconsistent decision making leading to projects being started and then abandoned.</li> <li>• Delays may lead to withdrawal of funding from Govt.</li> <li>• Contractor doesn't meet programme.</li> </ul>	
<b>Effects</b> <ul style="list-style-type: none"> <li>• Project fails to deliver objectives on time and/ or exceeds budget.</li> <li>• Developers and investors could be deterred.</li> <li>• Lack of growth.</li> <li>• <del>Possible legal issues from developer plans submitted before the Council consideration of schemes.</del></li> <li>• Missed opportunities to invest in areas of development potential.</li> <li>• Lack of visible progress with developments.</li> <li>• Financial and reputational risk/ poor publicity.</li> <li>• Development of Council land (car parks etc) could mean <b>temporary</b> loss of income streams.</li> <li>• Further uncertainty over availability of Council and external funding in the future.</li> <li>• <u>Business closure e.g. in retail, hospitality and leisure sectors.</u></li> <li>• The Council could face large revenue costs for aborted projects if external funding is withdrawn.</li> </ul>	
<b>Existing controls/ mitigating actions</b> <ul style="list-style-type: none"> <li>• Briefings for members (held regularly).</li> <li>• Project Manager post extended until 31/03/2025.</li> <li>• Bidding for external funds (arts council).</li> <li>• <del>Use of external support – Project Officers.</del></li> <li>• Communications – Press Releases.</li> <li>• Engagement with Partners e.g.: University, Bognor Regis Regeneration Board, Town &amp; Parish Councils &amp; <b>Arun Arts.</b></li> <li>• <del>High level business plan undertaken to inform future strategy.</del></li> <li>• Specific project risk schedule.</li> <li>• Provision made for Arun Arts equipment.</li> <li>• Regularly reviewed at Arun Programme Board.</li> </ul>	

- Engagement with DLUHC over timetables.
- Director of Growth meeting Project officer regularly.

**Further Actions**

Action	Target date
<p><del>The decision has been made to not increase the level of resource available for the present.</del>            Director of Growth meeting MD of Neilcott to discuss delays in project milestones.</p>	<p>Sept 2024</p>

RISK SCORING	Likelihood	Impact	TOTAL	Change in Net Risk Level
<b>Gross Risk Level</b>	Very Likely (4)	Very High (4)	16	➔
<b>Net Risk Level</b>	Very Likely (4)	Very High (4)	16	
<b>Target Risk Level</b>	Possible (2)	Very High (4)	8	

**CRR11c: Major Project- Bognor Regis Arcade****HIGH****Risk Owner:** Karl Roberts**Last updated:**  
15 Oct 2024**Risks Identified**

- Failure to regenerate coastal towns within the district.
- Failure to deliver major projects in line with funder requirements meaning funding is withdrawn.
- Insufficient resources to deliver vision and aspirations for the district.
- Relationship with existing tenants.

**Causes**

- Lack of funding to deliver major projects.
- Decisions not made swiftly enough.
- Lack of public/ partnership acceptance of, and buy-in to strategies.
- Multiple major projects running simultaneously- resources stretched.
- Impact of growth of Butlins and Chichester University influencing local market conditions.
- Other Council borrowing priorities/ increase in PWLB rates.
- Further uncertainty over availability of Council and external funding in the future.
- Inconsistent decision making leading to projects being started and then abandoned.

**Effects**

- Project fails to deliver objectives on time and/ or exceeds budget.
- Developers and investors could be deterred.
- Lack of growth.
- ~~Possible legal issues from developer plans submitted before the Council consideration of schemes.~~
- Missed opportunities to invest in areas of development potential.
- Lack of visible progress with developments.
- ~~Area turns into a commuter belt and is not regenerated leading to decline.~~
- Financial and reputational risk/ poor publicity.
- Further uncertainty over availability of Council and external funding in the future.
- The Council could face additional revenue costs for aborted projects if external funding is withdrawn.
- Need to resolve delivery/ management mechanism for residential units created.

**Existing controls/ mitigating actions**

- Briefings for members.
- Funding secured from Brownfield Land Fund. Other external funding opportunities being explored.
- Use of external support – Project Officers.
- Communications – Press Releases
- Engagement with Partners e.g.: University, Bognor Regis Regeneration Board, Town & Parish Councils.
- Specific project risk schedule.
- Reviewed regularly at Arun Programme Board.
- Regular meetings between Project Manager and P&E.

## Further Actions

Action	Target date
Internal discussions to take place regarding possible method of delivery.	Sept 2024
Discussion between P&E and Project Manager to resolve lease issues that potential may impede the delivery of the scheme which is subject to the p/p.	Oct 2024

RISK SCORING	Likelihood	Impact	TOTAL	Change in Net Risk Level
Gross Risk Level	Likely (3)	Very High (4)	12	→
Net Risk Level	Likely (3)	Very High (4)	12	
Target Risk Level	Possible (2)	High (3)	6	

<b>CRR1- A: Financial Resilience</b>	<b>MEDIUM</b>
<b>Risk Owner:</b> Tony Baden	<b>Last updated:</b> 15 Oct 2024
<p><b>Risks Identified</b></p> <ul style="list-style-type: none"> <li>• Failure to maintain a robust and deliverable budget will lead to a lack of resources to fund services and council priorities, leading to reactive decision making and reputational consequences.</li> <li>• Failure to maximise efficient use of resources and so unsuccessful redirection of resources and not achieving objectives and outcomes of the Council.</li> <li>• Failure to exploit income streams/ income generating activities/ commercial opportunities.</li> <li>• Increased inflation caused by utilities and supply contracts leading to significantly increased, unbudgeted costs.</li> <li>• <del>Potential for government to clawback £300K pa from 2020 onwards of Better Care Fund grant that is used on salaries of PSH team staff delivering adaptations, county project manager salary &amp; countywide minor repairs contract and countywide deep clean contract.</del></li> </ul>	
<p><b>Causes</b></p> <ul style="list-style-type: none"> <li>• The annual Local Government Finance Settlement not giving <b>creating uncertainty</b> beyond the next financial year.</li> <li>• The outcome of proposed Government reviews of the local authority funding system, e.g. the Fair Funding review, Business Rates review.</li> <li>• Reduction in government grants and external funding.</li> <li>• Ineffective financial/ budget management and monitoring.</li> <li>• Increased cost of building/ construction and maintenance.</li> <li>• <del>The outcome of the National Pay Negotiations/ Award.</del></li> </ul>	
<p><b>Effects</b></p> <ul style="list-style-type: none"> <li>• Non- achievement of corporate priorities.</li> <li>• Budget deficit.</li> <li>• Forced to make savings leading to a reduction in the quality-of-service delivery.</li> <li>• Increased costs and lower returns on investments.</li> <li>• Minimal return from income generating activities/ commercial opportunities.</li> <li>• Further pressure on demand led services e.g. benefits, homelessness etc.</li> <li>• Reduction or delays in housebuilding and maintenance of corporate/ commercial buildings.</li> <li>• Significant pressure on contracts, staff and projects.</li> <li>• If the Council is unable to achieve financial resilience through a balanced revenue budget, the Section 151 officer would be obliged to issue a section 114 notice, which would prohibit all new expenditure. This would be a very serious situation for the Council because under the 1988 Local Government Finance Act, it is not permissible for a Council's expenditure to exceed its income. However, this is currently deemed to be highly unlikely.</li> </ul>	
<ul style="list-style-type: none"> <li>• <b>Existing controls/ mitigating actions</b></li> <li>• <del>The Group Head of Finance has engaged an external resource to review and develop the Council's Medium Term Financial Forecast. This will be reported to Members as part of the budget setting process and will give an updated view of the Council's overall financial position. An updated MTFP report will be presented to the October and December Policy &amp; Finance Committee.</del></li> <li>• Medium Term Financial Strategy (MTFS) regularly reviewed and reported to Members at the Policy &amp; Finance Committee.</li> <li>• Annual budget setting and quarterly budget monitoring of income and capital and revenue expenditure .</li> </ul>	

- Regular reports to CMT, raising awareness of our current financial position. This includes the budget monitoring report, medium- term forecast and specific service area requirements e.g. quarterly report on the HRA to CMT.
- **Production of the annual** Capital Strategy. ~~2021/22–2023/24 reviewed annually.~~
- Continue to maximise Council tax increases.
- Control of expenditure- Approval limits and routes for additional funding are detailed in the Council's Constitution and Financial Regulations.
- Monitoring of potential changes to government policy, legislation etc.
- **Maintenance of** sufficient reserves.
- Officers concluded a service planning review exercise in September 2023. Proposals put forward by Group Heads were discussed with the Joint Chief Executives and identified significant savings in the 2024/25 budget which Members approved as part of the 2024/25 budget setting process.

### Further Actions

Action	Target date
Monitoring and reporting to CMT of the £1.5m savings approved as part of the detailed 2024/25 revenue budget.	May 2025
Two iterations of the MTFP have been reported to Members since October 2023, as well as several briefing sessions. It is intended that a further update will be presented to the December Policy & Finance committee.	
Implementation of the Council's Financial Strategy, approved by Full Council on 10 <sup>th</sup> January 2024.	Ongoing

RISK SCORING	Likelihood	Impact	TOTAL	Change in Net Risk Level
Gross Risk Level	Likely (2)	Very High (4)	8	→
Net Risk Level	Possible (2)	Very High (4)	8	
Target Risk Level				



<b><u>CRR2: Organisational capacity and transformation</u></b>	<b>MEDIUM</b>										
<b>Risk Owner:</b> Dawn Hudd	<b>Last updated:</b> 15 Oct 2024										
<b>Risks Identified</b> <ul style="list-style-type: none"> <li>• Lack of resilience in the staff structure and requirement to do more with less.</li> <li>• Lack of corporate capacity to drive transformational change and organisational development.</li> <li>• Failure to maintain business as usual (BAU)/appropriate levels of service.</li> <li>• Failure to implement change programmes, service improvements and efficiencies within agreed timescales and at pace.</li> </ul>											
<b>Causes</b> <ul style="list-style-type: none"> <li>• Uncompetitive salaries offered for certain positions/professions with a job profiling process that does not recognise external market forces.</li> <li>• Limited scope for career progression can reduce the retention of talented staff. Local government profile as an employer.</li> <li>• Insufficient management information, knowledge, skills, and resources to facilitate change.</li> </ul>											
<b>Effects</b> <ul style="list-style-type: none"> <li>• Non-achievement of corporate priorities and service standards and service disruption.</li> <li>• Loss of staff with essential knowledge and experience.</li> <li>• Increased staff sickness as a result of increased stress.</li> <li>• Inability to respond to additional priorities or emergency situations.</li> <li>• Unachieved strategic and operational objectives and/ or overruns on time and cost.</li> <li>• Reputational damage.</li> </ul>											
<b>Existing controls/ mitigating actions</b> <ul style="list-style-type: none"> <li>• Performance appraisal process identifies individual training requirements and individual objectives linked to service delivery plans.</li> <li>• Utilisation of secondment opportunities to benefit from existing skills and develop individual staff.</li> <li>• Staff sickness monitoring and reporting undertaken.</li> <li>• The use of market supplements and other recruitment and retention payments to attract applicants to vacancies and retain staff.</li> <li>• Pay comparison/benchmarking exercise with other Local Authorities is undertaken as required.</li> <li>• Hybrid working.</li> <li>• Project management processes and governance in place to monitor project delivery.</li> <li>• Service performance monitoring (KPIs)</li> </ul>											
<b>Further Actions</b> <table border="1" data-bbox="108 1727 1506 2098"> <thead> <tr> <th data-bbox="108 1727 1353 1805"><b>Action</b></th> <th data-bbox="1353 1727 1506 1805"><b>Target date</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="108 1805 1353 1877">Carry out a benchmark/comparison exercise of ADCs pay. Complete the review of job profiling.</td> <td data-bbox="1353 1805 1506 1877">31 Dec 2024</td> </tr> <tr> <td data-bbox="108 1877 1353 1951">Review the council's pay and reward policy including pay profiling system, pay scales, market supplements and other benefits.</td> <td data-bbox="1353 1877 1506 1951">31 Dec 2025</td> </tr> <tr> <td data-bbox="108 1951 1353 2063">Identify a specific training plan for all management tiers to cover business and management processes (for example, including Risk Management, the Constitution, Committee Structure/ Committee Reports and Budget management/ monitoring.</td> <td data-bbox="1353 1951 1506 2063"></td> </tr> <tr> <td data-bbox="108 2063 1353 2098">Undertake regular staff engagement surveys.</td> <td data-bbox="1353 2063 1506 2098">Ongoing</td> </tr> </tbody> </table>		<b>Action</b>	<b>Target date</b>	Carry out a benchmark/comparison exercise of ADCs pay. Complete the review of job profiling.	31 Dec 2024	Review the council's pay and reward policy including pay profiling system, pay scales, market supplements and other benefits.	31 Dec 2025	Identify a specific training plan for all management tiers to cover business and management processes (for example, including Risk Management, the Constitution, Committee Structure/ Committee Reports and Budget management/ monitoring.		Undertake regular staff engagement surveys.	Ongoing
<b>Action</b>	<b>Target date</b>										
Carry out a benchmark/comparison exercise of ADCs pay. Complete the review of job profiling.	31 Dec 2024										
Review the council's pay and reward policy including pay profiling system, pay scales, market supplements and other benefits.	31 Dec 2025										
Identify a specific training plan for all management tiers to cover business and management processes (for example, including Risk Management, the Constitution, Committee Structure/ Committee Reports and Budget management/ monitoring.											
Undertake regular staff engagement surveys.	Ongoing										

New Target Operating Model to be developed to reflect delivery of Council Vision. Form to follow function with resources directed to the vision priorities.	July 2025
Accommodation review to be completed which will include a review of flexible working policy.	

<b>RISK SCORING</b>	<b>Likelihood</b>	<b>Impact</b>	<b>TOTAL</b>	<b>Change in Net Risk Level</b>
<b>Gross Risk Level</b>	Very Likely (4)	Very High (4)	16	↓
<b>Net Risk Level</b>	Likely (3)	High (3)	9	
<b>Target Risk Level</b>	Possible (2)	Medium (2)	4	

**REVISED ENTRY**

<b><u>CRR4.1: ICT- Major successful cyber- attack</u></b>				<b>MEDIUM</b>
Risk Owner: Jackie Follis				Last updated: 15 Oct 2024
<b>Risks Identified</b>				
<ul style="list-style-type: none"> <li>Successful major cyber- attack</li> </ul>				
<b>Causes</b>				
<ul style="list-style-type: none"> <li>Virus, malware, ransomware or unauthorised access stamps.</li> </ul>				
<b>Effects</b>				
<ul style="list-style-type: none"> <li>Loss of IT services to staff &amp; public, data loss &amp; corruption or data breach; impact could be localised or whole council.</li> </ul>				
<b>Existing controls/ mitigating actions</b>				
<ul style="list-style-type: none"> <li>A layered approach is taken to security defences using a number of products and methods. If one layer is breached the next layer of protection takes over and so on.</li> <li>There are systems in place that automatically block a suspected attack, they also provide alerts and logs which will then be investigated.</li> <li>Intelligence is regularly received from multiple agencies of new or emerging cyber risks, these are then reviewed and where required mitigations implemented.</li> <li>Vulnerability scans are regularly run to identify potential risks and where required changes made to the operational environment.</li> <li>Laptops and servers are automatically patched within 5 days of a patch being released, if there is an urgent security patch this is pushed out straight away.</li> <li>Potential new supplier must complete a detailed security questionnaire which is then reviewed by the security team and where necessary clarifications are carried out. If a supplier does not meet an acceptable standard then they will be rejected.</li> <li>New staff undergo security and cyber training, periodic refreshers are mandated on all staff and where there is a current or emerging risk staff are informed either through intranet bulletins or everyone emails.</li> <li>In-house development has security included by design and automated tools are used to check for vulnerabilities and risks within the development stack.</li> <li>A number of methods are used to backup systems and data including multi-generation immutable backups and these provide different recovery points should they be required.</li> <li>The team continually review the cyber landscape for new and emerging threats and look for new ways to improve our cyber resilience and operational practices.</li> </ul>				
<b>Further Actions</b>				
<b>Action</b>				<b>Target date</b>
Review cyber insurance market.				31 <sup>st</sup> March 2025
<b>RISK SCORING</b>	<b>Likelihood</b>	<b>Impact</b>	<b>TOTAL</b>	<b>Change in Net Risk Level</b>
<b>Gross Risk Level</b>	Very Likely (4)	Very High (4)	16	➔
<b>Net Risk Level</b>	Possible (2)	Very High (4)	8	
<b>Target Risk Level</b>	Possible (2)	High (3)	6	

**REVISED ENTRY**

<b><u>CRR4.2: ICT- Physical or technical failure</u></b>				<b>MEDIUM</b>
Risk Owner: Jackie Follis				Last updated: 15 Oct 2024
<b>Risks Identified</b>				
<ul style="list-style-type: none"> <li>Complete loss of datacentre facility (physical).</li> </ul>				
<b>Causes</b>				
<ul style="list-style-type: none"> <li>Fire, flood or natural disaster.</li> </ul>				
<b>Effects</b>				
<ul style="list-style-type: none"> <li>Loss of IT services to all users.</li> </ul>				
=				
<b>Existing controls/ mitigating actions</b>				
<ul style="list-style-type: none"> <li>The main civic centre is protected from power loss by an external generator, in addition the data centre incorporates uninterruptable power supplies (ups) that protect the equipment from a mains power surge, in the event of a complete power loss they also allow a controlled shutdown of the datacentre.</li> <li>Our key infrastructure has fault tolerance built in by design, what that means is if a key component fails another will switch in to cover it, but at a slower capacity; sometimes this will require manual intervention.</li> <li>A number of different backup methods are used to allow recovery in different scenarios. Hourly snapshots are streamed to the disaster recovery (DR) off-site servers that will allow recovery with minimal data loss (max 1 hour) and full backups taken to a different location allowing restoring with data loss up to 24 hours.</li> <li>The DR off-site (geographical separated) is capable of running all services but with less capacity (e.g. slower and less users). It is not a hot-site facility which means services will not automatically switch over but will require ICT staff to rebuild the environment before it can be used. It could take up to 4 weeks to get all systems running (with limited capacity). If a wholesale datacentre recovery rebuild is required then this could take several months.</li> <li>The ICT strategy is cloud-first, this means as systems are replaced, we look to have them hosted in the Cloud. We use suppliers that are able to offer enhanced disaster recovery capabilities and quicker recovery times this is because they are able to utilise elastic processing power.</li> <li>Staff are issued laptop computers (and not desktop computers) and staff take these home. This has removed the risk that should the Civic Centre experience a major physical incident end-user devices will not be located in one place.</li> </ul>				
<b>Further Actions</b>				
<b>Action</b>				<b>Target date</b>
Review Disaster Recovery procedures				31 Mar 2025
Continue with cloud migration strategy				Ongoing
<b>RISK SCORING</b>	<b>Likelihood</b>	<b>Impact</b>	<b>TOTAL</b>	<b>Change in Net Risk Level</b>
Gross Risk Level	Possible (2)	Very High (4)	8	➔
Net Risk Level	Possible (2)	High (3)	6	
Target Risk Level	Possible (2)	Medium (2)	4	

**REVISED ENTRY**

<b><u>CRR5: Corporate Business Continuity</u></b>	<b>MEDIUM</b>
<b>Risk Owner:</b> Philippa Dart/ Joe Russell- Wells	<b>Last updated:</b> 15 Oct 2024
<b>Risks Identified</b> <ul style="list-style-type: none"><li>• Failure in the delivery of some or all services, including statutory services.</li><li>• Failure to maintain business as usual (BAU)/appropriate levels of service.</li></ul>	
<b>Causes</b> <ul style="list-style-type: none"><li>• Loss of buildings/ infrastructure through fire, flooding, or another serious environmental incident</li><li>• Sudden loss of key personnel / mass loss of staff through pandemic / industrial action.</li><li>• Breakdown in supply chain</li><li>• Loss of power or other services</li><li>• Significant ransomware or cyber-attacks. <b>(See separate risk # CRR 4).</b></li><li>• Insufficient time made available for staff training for both business continuity issues and requirements for dealing with emergencies under the Civil Contingencies Act incumbent on the authority.</li></ul>	
<b>Effects</b> <ul style="list-style-type: none"><li>• Inability to provide a range of key services to customers, including vulnerable customers.</li><li>• Financial loss and service disruption to customers and the Council.</li><li>• Inability to pay customers or contractors leading to loss of contractors/ suppliers reducing service provision.</li><li>• Inability to provide services leading to reputational damage.</li><li>• Possible breach of the Council's statutory duties under the Civil Contingencies Act.</li></ul>	
<b>Existing controls/ mitigating actions</b> <ul style="list-style-type: none"><li>• <b>Corporate Business Continuity Plan (CBCP).</b> Plan sets out the generic steps for the organisation to recover from an incident.</li><li>• <b>Business Impact Analysis (BIA) and Business Continuity Plan (BCP) templates and guidance to officers for their completion is included in the CBCP.</b></li><li>• The <b>Business Recovery Management Team (BRMT)</b> meets every 6 months. Tasks include identifying possible risks, ensuring Group Heads have signed off all BIA and BCP for all services areas. Minutes of the meeting are reported to CLT.</li><li>• <b>All service areas</b> are required to review and update their BIA and BCP annually or if there is a change in service.</li><li>• Each <b>BCP</b> is required to address how their service would continue to operate with loss of IT.</li><li>• Business Continuity arrangements reviewed by CLT at Performance Board meeting.</li><li>• BCPs and other critical information is stored in a separate server to enable access in case of IT failure - managers to retain up-to-date paper copies.</li><li>• Require all major contractors to have business continuity plans in place – and set out in all service BCP.</li><li>• Generic training for all staff to provide greater awareness of business continuity.</li> <li>• <b>Emergency Planning</b> Programme of training for staff across the organisation. This to be implemented over the next 12 months and kept under review.</li><li>• A 3- year plan for emergency plan review, training and exercising under a continuous 3-year cycle.</li></ul>	

- An intranet webpage describes roles and responsibilities in addition to training opportunities, e-learning & online resources and other links to Emergency planning information.

### Further Actions

Action	Target date
Consider business continuity arrangements as part of procurement strategy. This is to be kept up alongside procurement strategy timescales.	TBC
Working with the council's insurance firm Protector Insurance, an exercise to test the current business continuity plans will take place. This will test the priority services as set out in the CBCP.	18 Nov 2024
A report will be produced following the above exercise to provide an assessment of the exercise and give recommendations for improvements. These improvements will be acted on and incorporated into updated plans against a set out timescale.	Follows Nov 2024 exercise.
Further communications with staff over business-critical risks as continual reminder.	Raise at staff meetings
Introduce a bitesize BCP training course to all managers.	Spring 2025

RISK SCORING	Likelihood	Impact	TOTAL	Change in Net Risk Level
Gross Risk Level	Likely (3)	Very High (4)	12	→
Net Risk Level	Likely (3)	High (3)	9	
Target Risk Level	Likely (3)	Medium (2)	6	

<b><u>CRR6: Information Governance and Data Protection</u></b>	<b>MEDIUM</b>
<b>Risk Owner:</b> Daniel Bainbridge	<b>Last updated:</b> 15 Oct 2024
<b>Risks Identified</b> <ul style="list-style-type: none"> <li>• Failure to keep all personal data secure leading to a breach of the General Data Protection Regulations (GDPR) and Data Protection Act resulting in fines and reputational risk.</li> </ul>	
<b>Causes</b> <ul style="list-style-type: none"> <li>• Lack of awareness on information governance, security requirements and standards.</li> <li>• Lack of training and staff/ Member awareness of requirements.</li> <li>• Lack of clarity around what information is where and who is responsible for it.</li> <li>• Increased information sharing.</li> <li>• Increase in home and mobile working.</li> </ul>	
<b>Effects</b> <ul style="list-style-type: none"> <li>• Breach of GDPR/ Data Protection legislation resulting in financial penalties/ ICO censure.</li> <li>• Poor publicity/ reputational damage.</li> <li>• Incident management of possible breaches will require corporate/ CMT support and will impact existing work.</li> <li>• Less control over shared data.</li> </ul>	
<b>Existing controls/ mitigating actions</b> <ul style="list-style-type: none"> <li>• Trained resource to handle FOI/ DPA requests. Data Protection Officer appointed and trained.</li> <li>• Hut Six training on data protection in place for new starters and when updates are rolled out.</li> <li>• Annual mandatory DP training in place and undertaken for all staff including safe home working guidance to ensure protection and confidentiality of ADC data while working at home.</li> <li>• ICO guidance on preparation for General Data Protection Regulation (GDPR) reviewed and Action Plan progressed. Additional external advice obtained and transfer to GDPR and new Data Protection Act complete.</li> <li>• Data audit conducted, and policies updated for DPA/ GDPR compliance- now subject to ongoing review.</li> <li>• Policy/ publication updates completed, and regular briefings provided to CMT and staff.</li> <li>• Information Security Group (ISG) oversight of data protection and security compliance. ISG to review terms of reference and membership annually.</li> <li>• Data Protection incident management process developed and advised to staff/ management.</li> <li>• Head of Technology &amp; Digital and ICT Digital Manager added to delegated authority for GDPR/ DPA (to increase capacity). Availability arrangements for ICT out- of- hours incident response accepted by CMT.</li> <li>• Senior Information Management Officer has obtained FOI qualification.</li> <li>• Monitoring any ongoing legislative changes and implement actions as required.</li> <li>• Annual review of delegations to ensure they are up to date to reflect current postholders and that delegations sit within the correct service areas.</li> </ul>	

## Further Actions

Action	Target date
Implementation programme/action plan Information Governance audit recommendations. This includes implementing annual DP training for Members. All recommendations to be addressed by December 2024.	December 2024
Fresh data audit needed. Asset mapping required. Process needed for ongoing review- December 2024.	June 2024
Review library of DP and FOI policies. Update where needed. Create policies where required.	December 2024

RISK SCORING	Likelihood	Impact	TOTAL	Change in Net Risk Level
<b>Gross Risk Level</b>	Likely (3)	High (3)	9	→
<b>Net Risk Level</b>	Possible (2)	Medium (2)	4	
<b>Target Risk Level</b>	Possible (2)	Medium (2)	4	



<b><u>CRR8: Corporate Health and Safety</u></b>	<b>MEDIUM</b>
<b>Risk Owner:</b> Nat Slade	<b>Last updated:</b> 15 Oct 2024
<b>Risks Identified</b> <ul style="list-style-type: none"> <li>• Failure to adhere to Health and Safety policies and procedures and legal requirements leading to death, serious injury, or life limiting illness, of an employee or third party resulting in prosecution under Health and Safety legislation, adverse publicity, fines, and possible prison sentences. Such failures may also lead to civil claims for compensation.</li> </ul>	
<b>Causes</b> <ul style="list-style-type: none"> <li>• Inadequate health and safety arrangements.</li> <li>• Lack of awareness of Health and Safety policies, procedures, and responsibilities.</li> <li>• Inadequate capability, competence and/or training of managers and staff on health and safety.</li> <li>• Insufficient resources or capacity to manage health and safety.</li> <li>• Lack of staff training.</li> </ul>	
<b>Effects</b> <ul style="list-style-type: none"> <li>• Death, injury or life limiting illness, to staff or third party resulting in prosecution under Health and Safety legislation.</li> <li>• Other enforcement action causing prohibition/closure or interruption of service or activity.</li> <li>• Reputational damage/ poor publicity.</li> <li>• Corporate manslaughter prosecution.</li> <li>• Fines and possible prison sentences.</li> <li>• Civil claims for compensation.</li> <li>• Regulatory censure/ intervention.</li> <li>• Adopted and published health and safety policies, and procedures and guidance are available to all staff via the intranet. The Council Health &amp; Safety Policy includes detailed responsibilities.</li> <li>• Safety Management Programme tasks issued monthly, to manage service level risks.</li> <li>• Ongoing review and refinement of the Safety Management Programme e.g. MS Forms are used for tasks (where possible) to make the tasks more user friendly and easier/ quicker to complete.</li> <li>• Corporate health and safety support function within Environmental Health.</li> <li>• Quarterly reports on health and safety provided to CMT. Monthly KPI (CP6).</li> <li>• Corporate health and safety commentary on committee reports.</li> <li>• Internal Audit of Corporate Health &amp; Safety July 2022.</li> </ul>	
<b>Existing controls/ mitigating actions</b> <ul style="list-style-type: none"> <li>• Adopted and published health and safety policies, and procedures and guidance are available to all staff via the intranet. The Council Health &amp; Safety Policy includes detailed responsibilities.</li> <li>• Safety Management Programme tasks issued monthly, to manage service level risks.</li> <li>• Ongoing refinement of the Safety Management Programme.</li> <li>• Corporate health and safety support function within Environmental Health.</li> <li>• Quarterly reports on health and safety provided to CMT. Monthly KPI (CP6).</li> <li>• Corporate health and safety commentary on committee reports.</li> <li>• Internal Audit of Corporate Health &amp; Safety July 2022 and the Action Plan is complete.</li> </ul>	

## Further Actions

Action	Target date
<p>Introduce manager health &amp; safety induction training. Unable to progress at present due to resource constraints (additional post was not approved), however we will look to include some manager specific training within the training courses bought-in using the £20k of additional funding by the end of March 2024.</p> <p>The result of the training and its impact on the Net Risk score will be monitored.</p>	31 March 2025
<p>Introduce corporate health and safety training programme. Work is already being undertaken on this with Adele, and a number of potential training platforms are being reviewed. Target to commence initial phase of training- End January 2024.</p>	31 March 2025
<p>Introduce an annual health and safety verification/assurance programme. Unable to proceed at present due to resource constraints (additional post was not approved). We will endeavour to utilise any underspend on the £20k following implementation of the training programme towards audits/ assurance, however the ability to organise and supervise any assurance scheme may be limited by the current resource allocated to corporate health &amp; safety. In 2023/24 we have already committed to provide assurance on the reception risk assessment and arrangements. Target to confirm scope/ capacity for an annual audit assurance plan (subject to remaining funds) by 31 March 2024.</p>	Ongoing
<p>Develop health and safety culture and communications. Unable to proceed due to resource constraints (additional post was not approved).</p>	On Hold

RISK SCORING	Likelihood	Impact	TOTAL	Change in Net Risk Level
<b>Gross Risk Level</b>	High (3)	Very High (4)	12	→
<b>Net Risk Level</b>	Possible (2)	Very High (4)	8	
<b>Target Risk Level</b>	Possible (2)	High (3)	6	

<b><u>CRR9: Equality, Diversity and Inclusion</u></b>	<b>MEDIUM</b>
<b>Risk Owner:</b> Jackie Follis	<b>Last updated:</b> 15 Oct 2024
<p><b>Risks Identified</b></p> <ul style="list-style-type: none"> <li>• The Council fails to meet its statutory obligations under the Equality Act 2010 <b>and emerging legislative requirements.</b></li> <li>• Insufficient resource is put in place to ensure equality and diversity requirements are mainstreamed and embedded. Furthermore, the lack of resources means our understanding of our current position with regards to legislation and best practice is limited.</li> <li>• Services areas may focus on what they consider their core business and consider equality and diversity less relevant/ important.</li> <li>• Staff are not protected and as a result are subjected to unacceptable behaviour/ treatment.</li> </ul>	
<p><b>Causes</b></p> <ul style="list-style-type: none"> <li>• Lack of consistent council- wide knowledge on Public Sector Equality duty and how to take equalities into consideration.</li> <li>• Gaps in available data and analysis to understand potential impacts of decision making.</li> <li>• Compliance driven rather than understanding based on good analysis.</li> <li>• High turnover of staff resulting in loss of knowledge/ institutional memory loss.</li> <li>• Overall budget pressures. Other priorities require funding.</li> <li>• <del>Some funding is in place, but it is not sufficient to meet all aspirations.</del></li> <li>• Insufficient prioritisation/ competing against other priorities corporately and within service areas.</li> <li>• Lack of or inconsistent ownership within or across service areas.</li> </ul>	
<p><b>Effects</b></p> <ul style="list-style-type: none"> <li>• Challenged in court via Judicial review for failing to meet equalities duties.</li> <li>• Negative Impact on staff morale and performance if the work environment is not perceived to be equitable resulting in increased turnover and staff absence.</li> <li>• Our aspirations are not achieved, and this could result in stakeholders' concerns not being addressed.</li> <li>• Compliance failure within some service areas.</li> <li>• Financial implications of non- compliance resulting in legal action at Employment Tribunal or civil action for external issues. Worst case scenario is that there is no financial limit on discrimination remedy at an ET.</li> <li>• Reputational damage.</li> </ul>	
<p><b>Existing controls/ mitigating actions</b></p> <ul style="list-style-type: none"> <li>• By the nature of the services delivered by the Council, policies and procedures are designed to be inclusive. As a result equality, diversity and inclusion requirements <b>should be</b> automatically captured and addressed.</li> <li>• Consultation on Council services and projects enables equality and diversity feedback to be obtained and considered where appropriate.</li> <li>• Staff and Customer satisfaction surveys are undertaken providing an opportunity for weaknesses to be highlighted and addressed.</li> <li>• The Council has a specific section on the Committee Report Template ((Section 13: Equalities Impact Assessment (EIA)/ Social Value) to ensure that equality and diversity is considered as part of the decision- making process. <del>Any comments completed within this section will be reviewed by an appropriate officer prior to going to committee.</del></li> <li>• The Council's Complaints Procedure provides an opportunity for equality and diversity weaknesses/ failings to be highlighted and monitored, addressed and lessons learnt to be carried forward.</li> </ul>	

- The Council has strong Human Resource policies and procedures that support equality and diversity, for example:
  - Dignity at work,
  - Equality, diversity and inclusion policy,
  - Recruitment
- Mandatory online equalities and diversity refresher training is provided to all staff every two years. Annual training carried out for new starters.
- Awareness training is offered to all members when they are elected (but with limited take-up).
- Annual monitoring of equal opportunities recruitment is undertaken.
- The Council's Customer of Concern Register aims to protect staff against unacceptable behaviour/ treatment.

### Further Actions

Action	Target date
An equalities and diversity assessment/ review was planned to ascertain what service areas currently do to ensure compliance. This action cannot currently be completed within existing resources and CLT will continue to review the position to determine at what point (if at all) additional resources will be allocated to mitigate the risk and ensure that actions are taken so that legislation, policies and procedures are appropriately embedded.	On hold
Provide training on the resources that are available to assist Officers and Members understanding how to comply with EDI requirements and securing Social Value through the activities of the Council.	TBC
Strongly encourage awareness training for all members following local elections in 2023 and annually thereafter.	TBC

RISK SCORING	Likelihood	Impact	TOTAL	Change in Net Risk Level
Gross Risk Level	High (3)	Very High (4)	12	→
Net Risk Level	Possible (2)	Very High (4)	8	
Target Risk Level	Unlikely (1)	Very High (4)	4	

<b>CRR11b: Major Project- Littlehampton Seafront Project</b>	<b>MEDIUM</b>
<b>Risk Owner:</b> Philippa Dart	<b>Last updated:</b> 15 Oct 2024
<b>Risks Identified</b> <ul style="list-style-type: none"> <li>• Failure to regenerate coastal towns within the district.</li> <li>• Failure to deliver major projects in line with funder requirements meaning funding is withdrawn.</li> <li>• Insufficient resources to deliver vision and aspirations for the district.</li> </ul>	
<b>Causes</b> <ul style="list-style-type: none"> <li>• Lack of funding to deliver major projects.</li> <li>• Decisions not made swiftly enough.</li> <li>• Lack of public/ partnership acceptance of and buy-in to strategies.</li> <li>• Existing covenants and leases impose restrictions on scheme design.</li> <li>• Multiple major projects running simultaneously- resources stretched.</li> <li>• Other Council borrowing priorities/ increase in PWLB rates.</li> <li>• Uncertainty surrounding major Government schemes impacting the area e.g. Arundel by-pass, Chichester by- pass.</li> <li>• Further uncertainty over availability of Council and external funding in the future.</li> <li>• Inconsistent decision making leading to projects being started and then abandoned.</li> <li>• <b>Unforeseen issues during construction phase including unknown utility services, archaeological finds, unexploded ordnances.</b></li> </ul>	
<b>Effects</b> <ul style="list-style-type: none"> <li>• Project fails to deliver objectives on time and/ or exceeds budget.</li> <li>• Developers and invested could be deterred.</li> <li>• Lack of growth.</li> <li>• Possible legal issues from developer plans submitted before the Council consideration of schemes.</li> <li>• Missed opportunities to invest in areas of development potential.</li> <li>• Lack of visible progress with developments.</li> <li>• Area turns into a commuter belt and is not regenerated leading to decline.</li> <li>• Financial and reputational risk/ poor publicity.</li> <li>• Development of Council land (car parks etc) could mean loss of income streams.</li> <li>• Further uncertainty over availability of Council and external funding in the future.</li> <li>• Business closure e.g. in retail, hospitality and leisure sectors.</li> <li>• The Council could face large revenue costs for aborted projects if external funding is withdrawn.</li> </ul>	
<b>Existing controls/ mitigating actions</b> <ul style="list-style-type: none"> <li>• Update report presented to every meeting of Policy and Finance Committee. Regular updates included in members newsletter.</li> <li>• Project supported financially by external funds- <b>dialogue with MHCLG on programme.</b></li> <li>• <b>Use of external support – project management and cost control (Mace) with internal project team resource to minimise cost.</b></li> <li>• Engagement with parties regarding leases and covenants.</li> <li>• Project specific risk register reviewed and updated.</li> <li>• Project progress reported to Project Board.</li> <li>• <b>Communications strategy is in place and will be updated as required.</b></li> <li>• <b>Value engineering undertaken to retain costs within budget.</b></li> <li>• <b>Contract sum has been agreed with contingency in place. Additional expenditure during project subject to change control process.</b></li> </ul>	

- Engagement with Harvester agent undertaken, and revised layout agreed.

### Further Actions

Action	Target date
Phasing plans subject to ongoing review during construction to minimise impact on council revenue (car park income) and high season generally.	Jun 2025
Harvester revised demise lease to be prepared.	Dec 2024
Project adjustment request (PAR) to be submitted following budget to MHCLG to formalise extended programme.	Nov 2024
New business kiosk opportunities to be promoted via tender.	Jan 2025

RISK SCORING	Likelihood	Impact	TOTAL	Change in Net Risk Level
<b>Gross Risk Level</b>	High (3)	Very High (4)	12	→
<b>Net Risk Level</b>	Possible (2)	Very High (4)	8	
<b>Target Risk Level</b>	Possible (2)	Very High (4)	8	

The above is deemed to be an acceptable target level because of financial factors outside ADC control. Level may reduce pending MCHLG approval of a PAR to extend programme.

<b>CRR12: Homelessness</b>				<b>MEDIUM</b>
<b>Risk Owner:</b> Richard Tomkinson				<b>Last updated:</b> 15 Oct 2024
<b>Risks Identified</b>				
<ul style="list-style-type: none"> <li>• Increase in homelessness presentations.</li> <li>• Homelessness demand exceeds resources available.</li> </ul>				
<b>Causes</b>				
<ul style="list-style-type: none"> <li>• Not being able to meet the homelessness need.</li> <li>• Lack of suitable Emergency Accommodation (EA) and available Temporary Accommodation (TA).</li> <li>• Private Sector housing market becoming more expensive.</li> <li>• Increased complex homeless presentations.</li> <li>• Impact of the cost-of-living increases demand.</li> <li>• Increases in mortgage rates lead to more housing repossessions.</li> </ul>				
<b>Effects</b>				
<ul style="list-style-type: none"> <li>• Inadequate resource to manage the number of presentations.</li> <li>• Legal challenge.</li> <li>• Children being subject to homelessness.</li> <li>• Vulnerable people (disabled, elderly, chronically ill etc.) being subject to homelessness.</li> </ul>				
<b>Existing controls/ mitigating actions</b>				
<ul style="list-style-type: none"> <li>• Effective planning and deployment of resources.</li> <li>• Timely decision making and effective casework management by Housing Options Officers.</li> <li>• Regular monitoring of caseloads by the Team Leader.</li> <li>• Flag to Senior Management Team.</li> </ul>				
<b>Further Actions</b>				
<b>Action</b>				<b>Target date</b>
Aim to increase supply of accommodation for those who are homeless/ threatened with homelessness- acquire 7 new units by March 2023 through LAHF scheme. We have now acquired 6 additional TA units through LAHF with a further allocation of funds to deliver an additional 7 units 24/25 25/26.				Partially completed 2024. To be completed Mar 25
Review the possibility of a temporary adjustment to the allocation policy to prioritise households in TA; complete the review by end of September. Under the new Allocations policy all households in TA going into A band and get the highest priority.				Completed
Develop and deliver Emergency Accommodation (nightly paid) reduction plan.				Ongoing
<b>RISK SCORING</b>	<b>Likelihood</b>	<b>Impact</b>	<b>TOTAL</b>	<b>Change in Net Risk Level</b>
<b>Gross Risk Level</b>	Very High (4)	Very High (4)	16	→
<b>Net Risk Level</b>	Likely (3)	High (3)	9	
<b>Target Risk Level</b>	Likely (3)	High (3)	9	

<b>CRR14: Housing Repairs</b>				<b>MEDIUM</b>
Risk Owner: Richard Tomkinson				Last updated: 15 Oct 2024
<b>Risks Identified</b>				
<ul style="list-style-type: none"> <li>Compliance Failings</li> </ul>				
<b>Causes</b>				
<ul style="list-style-type: none"> <li>A complaint or report to the Regulator of Social Housing (RSH) or an inspection which identifies failings could result in the RSH to serve a notice.</li> <li>Withdrawal of current resource without establishment of Compliance Manager role to base budget.</li> <li>Reduced expenditure budget for programmes and remedial works.</li> </ul>				
<b>Effects</b>				
<ul style="list-style-type: none"> <li>Regulator takes over compliance.</li> <li>Budget pressures to resolve with urgency.</li> <li>Reputational damage.</li> <li>Tenant complaints.</li> <li>Risk of serious incidents increased.</li> </ul>				
<b>Existing controls/ mitigating actions</b>				
<ul style="list-style-type: none"> <li>Robust contract evaluation.</li> <li>Regular financial checks.</li> <li>Have alternative suppliers/ framework in reserve Appointed different gas contractors for Domestic and Commercial Contracts so have built in back up should one fail.</li> <li>Monthly contract review meetings.</li> <li>Group Head developing role profile and wider service realignment to accommodate along with business case for inclusion in salaries and supervision budgets.</li> </ul>				
<b>Further Actions</b>				
<b>Action</b>				<b>Target date</b>
These measures have been established.				Part completed. Complete by end March 2025
Activity is undertaken to a program and continues to be managed and reviewed closely.				
CMT approval required and recruitment and selection.				Completed
<b>RISK SCORING</b>	<b>Likelihood</b>	<b>Impact</b>	<b>TOTAL</b>	<b>Change in Net Risk Level</b>
<b>Gross Risk Level</b>	Unlikely (1)	Very High (4)	4	→
<b>Net Risk Level</b>	Unlikely (1)	Very High (4)	4	
<b>Target Risk Level</b>	Unlikely (1)	Very High (4)	4	



<b>CRR15: Ineffective complaints management</b>				<b>MEDIUM</b>
Risk Owner: Richard Tomkinson				Last updated: 15 Oct 2024
<b>Risks Identified</b>				
<ul style="list-style-type: none"> <li>Ineffective complaints management.</li> </ul>				
<b>Causes</b>				
<ul style="list-style-type: none"> <li>High staff turnover.</li> <li>Lack of training.</li> <li>Lack of procedure.</li> <li>Lack of lessons learnt reviews.</li> </ul>				
<b>Effects</b>				
<ul style="list-style-type: none"> <li>Reputational damage.</li> <li>Poor relationship with tenants.</li> <li>Missed opportunity for service improvement.</li> <li>Complaints escalation.</li> <li>Non-compliance with the Ombudsman complaint handling code.</li> <li>Coming to the attention of the Housing Ombudsman &amp; Regulator for Social Housing.</li> </ul>				
<b>Existing controls/ mitigating actions</b>				
<ul style="list-style-type: none"> <li>Adherence to the Corporate Complaints Procedure requires the Council to have clear mechanisms in place for tenants to complain, and to respond to complaints promptly and effectively. Housing Services also need to ensure compliance with the Housing Ombudsman Complaint Handling Code which became statutory on 1 April 2024.</li> <li>An improved complaints process is now embedded within our service which has improved complaint handling and response times.</li> <li>Performance against the code, our policy and processes are monitored on a monthly basis and reported to the housing management team.</li> <li>We have a dedicated role which co-ordinates our complaints and have recently appointed a complaints officer who holds a caseload of complaints.</li> <li>Correct culture on complaints handling means complaint resolution is well managed and actions are clearer.</li> <li>Complaints are analysed for trends and themes, leading to lessons learn papers with recommends actions so we reduce the risk of recurring complaints.</li> </ul>				
<b>Further Actions</b>				
<b>Action</b>				<b>Target date</b>
Mandatory training for all housing staff to be completed by the end of quarter, this will then be carried out periodically and when new staff join.				31 Dec 2024
<b>RISK SCORING</b>	<b>Likelihood</b>	<b>Impact</b>	<b>TOTAL</b>	<b>Change in Net Risk Level</b>
<b>Gross Risk Level</b>	Likely (3)	High (3)	9	→
<b>Net Risk Level</b>	Possible (2)	Medium (2)	4	
<b>Target Risk Level</b>	Unlikely (1)	High (3)	3	

<b>CRR19: Littlehampton Harbour Board</b>	<b>MEDIUM</b>
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Risk Owner: Nat Slade/Tony Baden/Philippa Dart	Last updated: 15 Oct 2024
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- Risks Identified**
- Possibility of Arun District Council being liable to pay an unanticipated large sum of the LHB costs. The Council is legally obliged to fund 50% of LHB operational ~~costs~~ deficit, WSCC funds the other 50%.
  - The amount to be paid by the Council is in dispute and subject to litigation.
  - The amount currently sought by the LHB would significantly increase pressure on the Council's revenue budget and capital programme to the extent that the Council would need to identify major cuts to other services and projects.

- Causes**
- LHB levy ADC to fund operational ~~running costs~~ deficit because the LHB does not operate at a surplus.
  - Additional expenditure would have a major impact on the Council's ability to achieve financial resilience – see CRR1-A.

- Effects**
- Without mitigation, the Council would face a considerable additional revenue budget deficit per annum, on top of the existing structural budget deficit.
  - A major reduction in the Council's revenue reserves, which would result in the issuing of a section 114 notice.

- Existing controls/ mitigating actions**
- Various meetings and discussions have been held with the LHB and internally amongst officers.
  - LHB have been advised that ADC does not consider itself liable for the costs of large infrastructure renewal schemes.
  - Lead and Deputy Leader have been briefed and all Group Leaders ~~will be briefed by 23/07/2024~~ were briefed in 2024.
  - Case meeting between Officers and the Council's legal representatives, to prepare papers for an independent judicial review was completed in August 2024.

**Further Actions**

Action	Target date
Judicial Review to take place possibly in Autumn 2024.	TBC

RISK SCORING	Likelihood	Impact	TOTAL	Change in Net Risk Level
Gross Risk Level	Very Likely (4)	Very High (4)	16	
Net Risk Level	Possible (2)	Very High (4)	8	
Target Risk Level				