



BROMLEY CIVIC CENTRE, STOCKWELL CLOSE, BROMLEY BRI 3UH

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DATE: 21 July 2022

## EXECUTIVE, RESOURCES AND CONTRACTS PDS COMMITTEE INFORMATION BRIEFING

**Meeting to be held on Thursday 28 July 2022**

This briefing will only be debated if a member of the Committee requests a discussion be held, in which case please inform the Clerk 24 hours in advance indicating the aspects of the information item you wish to discuss. In addition, questions on the briefing should also be sent to the Clerk at least 24 hours before the meeting.

### QUESTIONS ON THE INFORMATION BRIEFING

The Briefing comprises:

**1 RISK MANAGEMENT** (Pages 3 - 26)

Members have been provided with advanced copies of the briefing via email. The briefing is also available on the Council website at the following link:

<http://cds.bromley.gov.uk/ieListMeetings.aspx?CId=559&Year=0>

*Copies of the documents referred to above can be obtained from*  
<http://cds.bromley.gov.uk/>

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Report No.  
FSD22058

## London Borough of Bromley

### PART ONE - PUBLIC

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**Decision Maker:** EXECUTIVE, RESOURCES AND CONTRACTS POLICY  
DEVELOPMENT AND SCRUTINY COMMITTEE

**Date:** Information Briefing – Thursday 28<sup>th</sup> July 2022

**Decision Type:** Non-Urgent                      Non-Executive                      Non-Key

**Title:** RISK MANAGEMENT

**Contact Officer:** Tasnim Shawkat, Director of Corporate Services and Governance –  
Corporate Services Risk Register  
Tel: 020 8461 7899    E-mail: [tasnim.shawkat@bromley.gov.uk](mailto:tasnim.shawkat@bromley.gov.uk)

Peter Turner, Director of Finance – Finance Risk Register  
Tel: 020 8313 4338    E-mail: [peter.turner@bromley.gov.uk](mailto:peter.turner@bromley.gov.uk)

Charles Obazuaye, Director of Human Resources and Customer Services –  
Human Resources and Customer Services Risk Register  
Tel: 020 8313 4335    E mail: [charles.obazuaye@bromley.gov.uk](mailto:charles.obazuaye@bromley.gov.uk)

**Chief Officer:** Director of Finance

**Ward:** All Wards

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1. Reason for report

This report provides the Executive, Resources and Contracts Policy, Development and Scrutiny Committee with the current iteration of the Corporate Risk Register, together with those for the Corporate Services, Finance, and Human Resources and Customer Services departments.

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2. **RECOMMENDATION(S)**

**Members of the Executive, Resources and Contracts Policy, Development and Scrutiny Committee are requested to note the current iterations of the Risk Registers and direct any queries they may have to the relevant Contact Officer**

### Impact on Vulnerable Adults and Children

1. Summary of Impact: There are no direct implications for Vulnerable Adults and Children arising from the attached Risk Register extracts, although failure of the Council to meet its commitments in any risk area could directly impact on life chances
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### Transformation Policy

1. Policy Status: Not Applicable:
  2. Making Bromley Even Better Priority  
To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents.
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### Financial

1. Cost of proposal: Not Applicable
  2. Ongoing costs: Not Applicable
  3. Budget head/performance centre: Not Applicable
  4. Total current budget for this head: £ Not Applicable
  5. Source of funding: Not Applicable
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### Personnel

1. Number of staff (current and additional): Not Applicable
  2. If from existing staff resources, number of staff hours: Not Applicable
- 

### Legal

1. Legal Requirement: None:
  2. Call-in: Not Applicable: Information Item
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### Procurement

1. Summary of Procurement Implications: Where applicable, the risk category is reflected as Contractual and Partnership.
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### Property

1. Summary of Property Implications: Where applicable, the risk category is reflected as 'Physical', which includes hazards/risks associated with buildings.
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### Carbon Reduction and Social Value

1. Summary of Carbon Reduction/Sustainability Implications: Where applicable, the risk category is reflected as Environmental.
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### Customer Impact

1. Estimated number of users or customers (current and projected): This report is intended primarily for the benefit of members of the Executive, Resources and Contracts Policy, Development and Scrutiny Committee.
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### Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments: Not Applicable

### 3. COMMENTARY

3.1 This report provides Members of the Executive, Resources and Contracts Policy, Development and Scrutiny Committee with the most recent iterations of the Risk Registers falling within their remit. Each Risk Register has been drawn up in line with the Risk Assessment Guidance depicted in Appendix A.

- Corporate Services (Appendix B)
- Finance (Appendix C)
- Human Resources and Customer Services (Appendix D)
- Corporate (Appendix E)

3.2 Each Director retains responsibility for the Risks and Controls within their division, with Internal Audit coordinating the Risk Management process via the Corporate Risk Management Group and the Audit and Risk Management Committee. The Corporate Risk Register identifies the organisation's key risks to the delivery of the Corporate objectives through the 'Making Bromley Even Better' strategy. Risks are elevated to the Corporate Risk Register by the Corporate Leadership Team.

3.3 In line with the risk reporting cycle, formal scrutiny of the Registers was undertaken by the Corporate Risk Management Group on 23<sup>rd</sup> May and the Audit and Risk Management Committee on 30<sup>th</sup> June 2022. Risk Registers were last presented in full to the Executive, Resources and Contracts Committee on 18<sup>th</sup> November 2021 and the Red Risks extract on 24<sup>th</sup> May 2022. Since these reports to the Executive, Resources and Contracts Committee, salient amendments have been made to both the Corporate and all three departmental risk registers as set out in Table 1.

3.4 The key changes to the Corporate Risk Register are as follows:-

Two 'High' Net Risks have been added:-

- Cyber attack and failure to comply with GDPR (Risk 6)
- Homes for Ukraine (Risk 15). Please note that this risk was added subsequent to finalisation of the Risk Register pack for Audit and Risk Management Committee on 30<sup>th</sup> June.

One 'Significant' Net Risk has been added - Health & Safety (Fire and First Aid) (Risk 14).

One 'Significant' Net Risk has been removed - Impact of COVID-19 pandemic on service delivery (Risk 12), with the impact now managed within business as usual.

One 'Significant' Net Risk has reduced to 'Medium' - Failure to maintain robust Business Continuity and Emergency Planning arrangements (Risk 7)

**Table 1**

<b>Corporate Services Register</b>	
(For full risk narrative, please see Appendix B)	
<b>Risk 6</b>	<p>Addition of '<b>Laptop Manufacturer/Provider Issue</b>. Current model of corporate laptop in constraint' risk.</p> <p>Gross Risk Rating 'Significant' and Net Risk Rating 'Low'.</p>

<b>Risk 7</b>	<p>Addition of '<b>Delay in IT Managed Service re-procurement</b>' risk.</p> <p>Gross Risk Rating 'Medium' and Net Risk Rating 'Low'.</p>
<b>Risk 10</b>	<p><b>Budgetary Overspend</b></p> <p>(Gross Risk Rating 'Significant' and Net Risk Rating 'Medium')</p> <p>Refresh of the Further Action Required.</p>
<b>Risk 15</b>	<p><b>Ineffective governance and management of contracts</b></p> <p>(Gross Risk Rating 'Significant' and Net Risk Rating 'Medium')</p> <p>Refresh of the Causes, Effects and Further Action Required.</p> <p>These amendments have also been reflected in the Corporate Risk Register (Risk 4).</p>
<b>Risk 16</b>	<p><b>Ineffective governance and management of contracts - Contracts Database</b></p> <p>Decrease of the Gross Impact and consequent decrease of the Gross Risk Rating (remains 'Medium'). Decrease of the Net Likelihood, and the Net Impact, and consequent decrease of the Net Risk Rating from 'Medium' to 'Low'.</p> <p>Refresh of the Causes, Effects, Controls and Further Action Required.</p>

**Finance**

(For full risk narrative, please see Appendix C)

<b>Risk 5</b>	<p><b>Failure to deliver a sustainable Financial Strategy which meets with Making Bromley Even Better priorities and failure of individual departments to meet budget</b></p> <p>(Gross and Net Risk Ratings 'High')</p> <p>Refresh of the Causes to reflect significant increases to inflation.</p> <p>This amendment has also been reflected in the Corporate Risk Register (Risk 1).</p>
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## Human Resources and Customer Services

(For full risk narrative, please see Appendix D)

<b>Risk 10</b>	<p>Addition of <b>‘Failure to comply with H&amp;S related legislative requirements e.g. Health and Safety at Work etc. Act 1974’</b> risk</p> <p>Gross Risk Rating ‘Significant’ and Net Risk Rating ‘Medium’.</p>
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## Corporate Risk Register

(For full risk narrative, please see Appendix E)

<b>Risk 1</b>	<p><b>Failure to deliver a sustainable Financial Strategy which meets with Making Bromley Even Better priorities and failure of individual departments to meet budget</b></p> <p>(Gross and Net Risk Ratings ‘High’)</p> <p>Refresh of the Causes to reflect significant increases to inflation.</p> <p>This amendment reflects that in the Finance Risk Register section above (Risk 5).</p>
<b>Risk 2</b>	<p><b>Failure to deliver partial implementation of Health and Social Care Integration</b></p> <p>(Gross Risk Rating ‘Medium’, Net Risk Rating ‘Low’)</p> <p>Refresh of the Causes and Controls.</p>
<b>Risk 4</b>	<p><b>Ineffective governance, procurement and management of contracts</b></p> <p>(Gross Risk Rating ‘Significant’ and Net Risk Rating ‘Medium’)</p> <p>Refresh of the Causes, Effects and Further Action Required.</p> <p>These amendments reflect those in the Corporate Services Risk Register (Risk 15).</p>
<b>Risk 6</b>	<p>Addition of <b>‘Cyber attack and failure to comply with GDPR’</b> risk</p> <p>(Gross and Net Risk Ratings ‘High’)</p>



<p><b>Risk 7</b></p>	<p><b>Failure to maintain robust Business Continuity and Emergency Planning arrangements</b></p> <p>(Gross Risk Rating 'Significant')</p> <p>Reduction of the Net Impact and consequent reduction of Net Risk Rating from 'Significant' to 'Medium', and refresh of the Causes, Effects, Controls and Further Action Required.</p>
<p><b>Risk 8</b></p>	<p><b>Failure to deliver effective Children's services</b></p> <p>The Council is unable to deliver an effective children's service to fulfil its statutory obligations in safeguarding and protect those at risk of significant harm or death, sexual exploitation or missing from care.</p> <p>(Gross Risk Rating 'High', Net Risk Rating 'Significant')</p> <p>Refresh of the Controls.</p>
<p><b>Risk 11</b></p>	<p><b>Failure to deliver the Transforming Bromley Programme</b></p> <p>(Gross and Net Risk Ratings 'High')</p> <p>Refresh of the Causes and Effects.</p>
<p><b>Risk 12</b></p>	<p><b>Removal of 'Impact of COVID-19 pandemic on service delivery'</b></p> <p>(Gross Risk Rating 'High', Net Risk Rating 'Significant')</p> <p>Impact now managed within Business as Usual (BAU).</p>
<p><b>Risk 14</b></p>	<p>Addition of <b>'Health &amp; Safety (Fire and First Aid). Non compliance with legislation: Regulatory Reform (Fire Safety) Order 2005, as amended by the Fire Safety Act 2021 and Health and Safety (First Aid) Regulations 1981'</b> risk</p> <p>Gross Risk Rating 'High', Net Risk Rating 'Significant'.</p>
<p><b>Risk 15</b></p>	<p>Addition of <b>'Homes for Ukraine. Inability to effectively manage the volume of people, including unaccompanied minors, who may present as homeless due to cessation of sponsor accommodation safeguarding concerns and the resulting additional pressures placed on the homeless budgets and children's social care'</b> risk</p> <p>Gross and Net Risk Ratings 'High'.</p>

#### **4. IMPACT ON VULNERABLE ADULTS AND CHILDREN**

4.1 There are no direct implications for Vulnerable Adults and Children arising from the attached Risk Register extracts although failure of the Council to meet its commitments in any risk area could indirectly impact on life chances.

#### **5. TRANSFORMATION/POLICY IMPLICATIONS**

5.1 Where applicable, the risk category in all registers is reflected as 'Financial, Operational'.

#### **6. FINANCIAL IMPLICATIONS**

6.1 The Finance department's Gross Red Risks are attached as Appendix C. Where applicable, the risk category in all registers is reflected as 'Financial, Operational'.

#### **7. PERSONNEL IMPLICATIONS**

7.1 The Human Resources' department's Gross Red Risk is attached as Appendix D. Where applicable, the risk category in all risk registers is reflected as 'Personnel, Operational'.

#### **8. LEGAL IMPLICATIONS**

8.1 Where applicable, the risk category in all registers is reflected as 'Legal, Operational'.

#### **9. PROCUREMENT IMPLICATIONS**

9.1 Where applicable, the risk category in all registers is reflected as 'Contractual and Partnership'.

#### **10. PROPERTY IMPLICATIONS**

10.1 Where applicable, the risk category is reflected as 'Physical, Operational', which includes hazards/risks associated with buildings.

#### **11. CARBON REDUCTION/SOCIAL VALUE IMPLICATIONS**

11.1 Where applicable, the risk category is reflected as Environmental.

<b>Non-Applicable Headings:</b>	Customer Impact Ward Councillor Views
Background Documents: (Access via Contact Officer)	None

**Risk Assessment Guidance**

Likelihood	Almost Certain (5)	5	10	15	20	25	<table border="1"> <tr> <td>15+</td> <td><b>High Risk</b> - review controls and actions every month</td> </tr> <tr> <td>10 - 12</td> <td><b>Significant Risk</b> - review controls and actions every 3 months</td> </tr> <tr> <td>5 - 9</td> <td><b>Medium Risk</b> - review controls and actions every 6 months</td> </tr> <tr> <td>1 - 4</td> <td><b>Low Risk</b> - review controls and actions at least annually</td> </tr> </table>	15+	<b>High Risk</b> - review controls and actions every month	10 - 12	<b>Significant Risk</b> - review controls and actions every 3 months	5 - 9	<b>Medium Risk</b> - review controls and actions every 6 months	1 - 4	<b>Low Risk</b> - review controls and actions at least annually
	15+	<b>High Risk</b> - review controls and actions every month													
	10 - 12	<b>Significant Risk</b> - review controls and actions every 3 months													
	5 - 9	<b>Medium Risk</b> - review controls and actions every 6 months													
	1 - 4	<b>Low Risk</b> - review controls and actions at least annually													
Highly likely (4)	4	8	12	16	20										
Likely (3)	3	6	9	12	15										
Unlikely (2)	2	4	6	8	10										
Remote (1)	1	2	3	4	5										
		Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)	Impact								

Risk Likelihood Key					
	Score - 1	Score - 2	Score - 3	Score - 4	Score - 5
	Remote	Unlikely	Possible	Likely	Definite
Expected frequency	10 - yearly	3 - yearly	Annually	Quarterly	Monthly

Risk Impact Key					
Risk Impact	Score - 1	Score - 2	Score - 3	Score - 4	Score - 5
	Insignificant	Minor	Moderate	Major	Catastrophic
Compliance & Regulation	Minor breach of internal regulations, not reportable	Minor breach of external regulations, not reportable	Breach of internal regulations leading to disciplinary action Breach of external regulations, reportable	Significant breach of external regulations leading to intervention or sanctions	Major breach leading to suspension or discontinuation of business and services
Financial	Less than £50,000	Between £50,000 and £100,000	Between £100,000 and £1,000,000	Between £1,000,000 and £5,000,000	More than £5,000,000
Service Delivery	Disruption to one service for a period of 1 week or less	Disruption to one service for a period of 2 weeks	Loss of one service for between 2-4 weeks	Loss of one or more services for a period of 1 month or more	Permanent cessation of service(s)
Reputation	Complaints from individuals / small groups of residents Low local coverage	Complaints from local stakeholders Adverse local media coverage	Broader based general dissatisfaction with the running of the council Adverse national media coverage	Significant adverse national media coverage Resignation of Director(s)	Persistent adverse national media coverage Resignation / removal of CEX / elected Member
Health & Safety	Minor incident resulting in little harm	Minor Injury to Council employee or someone in the Council's care	Serious Injury to Council employee or someone in the Council's care	Fatality to Council employee or someone in the Council's care	Multiple fatalities to Council employees or individuals in the Council's care

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## Corporate Services Risk Register - Appendix B

											DATE LAST REVIEWED:	06/05/2022	
REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press alt & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			FURTHER ACTION REQUIRED	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
1	Corporate Services	<b>IT Security failure</b>	<p><b>Cause(s):</b> Failure of IT Security (responsibility across Bromley &amp; BT) to manage risk of attack or intrusion leading to potential corruption / loss of data / loss of systems</p> <p><b>Effect(s):</b> Loss of service, potential fines, resident dissatisfaction</p>	Data and Information	4	5	20	<ul style="list-style-type: none"> <li>-Application of effective security management including effective application of anti-virus protection and security measures through the IT Contract with BT</li> <li>- Regular Penetration Testing undertaken</li> <li>- Information Security Team in place</li> <li>- Patch updates undertaken regularly</li> <li>- IG training programme</li> <li>- PSN Compliant</li> </ul>	2	5	10		Vinit Shukle
2	Corporate Services	<b>Telecommunications failure</b> Prolonged telecoms / switchboard failure	<p><b>Cause(s):</b> Power surge, contractor failure, malicious attack, IT failure</p> <p><b>Effect(s):</b> Widespread disruption across the Council</p>	Data and Information	3	5	15	<ul style="list-style-type: none"> <li>- Stand-by arrangements available so that in the event of failure highest priority services can be recovered</li> <li>- Technical design takes into account the criticality of systems and ensures, where justified, that additional resilience is built in</li> <li>- All Critical Services now have additional independent lines as contingency (if not their first line)</li> <li>- Additional resilience in use of LBB mobile phones</li> <li>- The ICT Disaster Recovery Plan is in progress</li> <li>- Working with BT to implement disaster recovery arrangements as part of new backup contract</li> <li>- Effective application of anti-virus protection and security measures through the IT contract with BT</li> </ul>	2	3	6	<ul style="list-style-type: none"> <li>- Virtualisation project will help facilitate disaster recovery provision</li> <li>- Secondary Session Initiation Protocol (SIP) connection being added to provide resilience.</li> </ul>	Vinit Shukle
3	Corporate Services	<b>IT System Failure (partial loss)</b> Partial loss of IT systems	<p><b>Cause(s):</b> Failure of Outlook or similar applications Failure of Novell Filing Registry system which carries details of all departmental files</p> <p><b>Effect(s):</b> Widespread disruption across the Council</p>	Data and Information - Operational	4	4	16	<ul style="list-style-type: none"> <li>- Effective incident management / support and resilient systems in use so that single points of failure are minimised</li> <li>- Technical design that takes into account the criticality of systems and ensures, where justified, that additional resilience is built in</li> <li>- Ensure proactive monitoring tools are in place to highlight potential issues before there is a major incident</li> <li>- System now migrated to the server</li> <li>- No longer dependent on Win7 - all services successfully transferred. However, the Novell filing registry/Regnet system has no further upgrade options and is not compatible with Win10 which will be deployed before December 2019 (Win7 support expiry date)</li> </ul>	4	3	12	<p>The Norwell System is currently used by legal team for historical file information only on a 'stand alone' PC. As part of any future platform upgrades, investigation will need to be carried out as to whether this option is still viable (by way of impact assessment) or look at migrating the historical data into Norwel (the current system).</p>	Vinit Shukle
4	Corporate Services	<b>IT System Failure (total loss)</b> Complete failure of IT systems resulting in widespread disruption across the Council	<p><b>Cause(s):</b> Complete loss of data centre and related hardware</p> <p><b>Effect(s):</b> Widespread disruption across the Council Financial loss Reputational impact</p>	Data and Information - Operational	3	5	15	<ul style="list-style-type: none"> <li>- Effective incident management / support and resilient systems in use so that single points of failure are minimised</li> <li>- Technical design that takes into account the criticality of systems and ensures, where justified, that additional resilience is built in</li> <li>- Ensure proactive monitoring tools are in place to highlight potential issues before there is a major incident</li> <li>- Backup power arrangements in the event of power issues (most likely)</li> <li>- Server room has fire suppression, water detection and significant physical security measures have been undertaken.</li> </ul>	2	4	8	<ul style="list-style-type: none"> <li>- Property are planning additional works to resolve the issues that caused the outages, but until then we remain at an elevated risk.</li> </ul>	Vinit Shukle
5	Corporate Services	<b>Network Loss</b> Loss of the customer service centre network as a result of a major malfunction of the council's network, leading to system access loss preventing staff from processing service requests.	<p><b>Cause(s):</b> Major malfunction of council's network caused by Cyber Attack or other means</p> <p><b>Effect(s):</b> Loss of system access Service Disruption Reputational impact</p>	Data and Information - Operational	3	3	9	<ul style="list-style-type: none"> <li>- Existing local resilience procedures (over Liberata network via Citrix)</li> <li>- Business Continuity Plan and manual procedure plans in place</li> <li>- Prepared for use of smart telephony messaging, web banner message and reception signage</li> </ul>	3	2	6		Vinit Shukle
6	Corporate Services	<b>Laptop Manufacturer/Provider Issue</b> Current model of corporate laptop in constraint	<p><b>Cause(s):</b> Delays/constraints in production due to Pandemic issues and/or component availability</p> <p><b>Effect (s):</b> IT will not be able to deliver laptop requirements for new starters or provide additional laptops for existing staff</p>		4	3	12	<ul style="list-style-type: none"> <li>BT managing the hardware roadmap with third party supplier</li> <li>Alternative specification laptop sourced</li> <li>Rolling stock management in place</li> </ul>	1	1	1	<ul style="list-style-type: none"> <li>Alternative make and model of laptop be sourced, and tested with corporate build for compatibility and performance</li> </ul>	Vinit Shukle
7	Corporate Services	<b>Delay in IT Managed Service re-procurement</b>	<p><b>Cause(s):</b> Reduced resourcing within the IT Re-Procurement programme owing to current pandemic situation</p> <p><b>Effect (s):</b> Current IT contractor would maintain service and revert to their standard T&amp;Cs &amp; pricing, affecting budgets.</p>		3	2	6	<ul style="list-style-type: none"> <li>Central Document repository storing all information</li> <li>x2 Consultants already appointed in addition to LBB staff</li> </ul>	1	1	1	<ul style="list-style-type: none"> <li>Potential renegotiation of T&amp;C &amp; pricing</li> </ul>	Vinit Shukle

## Corporate Services Risk Register - Appendix B

											DATE LAST REVIEWED:	06/05/2022	
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					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
8	Corporate Services	<b>Effective governance and management of information</b>	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Lack of organisational buy-in from information asset owners</li> <li>- Lack of governance</li> <li>- Poor awareness / education in understanding purpose</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Breach of statutory obligations through failure of compliance with relevant legislation e.g. GDPR, UK DPA, FOIA, EIR</li> <li>- potential fines</li> <li>- increased information security attack surface</li> <li>- increased storage costs for on-prem data</li> </ul>	Data and Information - Operational	4	4	16	<ul style="list-style-type: none"> <li>- information governance training provided to all officers</li> <li>- system security reviews</li> <li>- SIEM system monitoring</li> <li>- Data Protection Impact Assessments</li> </ul>	3	4	12	review and implementation of retention schedule in all systems hosting data	Vinit Shukle
9	Corporate Services	<b>Compliance with Information Request laws</b>	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Lack of organisational awareness</li> <li>- responsibility for responding are add on tasks to existing roles</li> <li>- data sprawl and lack of retention - large data scopes</li> <li>- lack of indexing and search capabilities</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Breach of statutory obligations through failure of compliance with relevant legislation e.g. GDPR, UK DPA, FOIA, EIR</li> <li>- potential fines</li> <li>- reputational damage</li> </ul>	Data and Information - Operational	4	5	20	<ul style="list-style-type: none"> <li>- information governance training provided to all officers</li> <li>- system security reviews</li> <li>- SIEM system monitoring</li> <li>- Data Protection Impact Assessments</li> </ul>	3	5	15	<ul style="list-style-type: none"> <li>- increased training and awareness</li> <li>- experienced resources to triage and redact where necessary</li> <li>- improved technical measures to assist data searches</li> </ul>	Vinit Shukle
10	Corporate Services	<b>Budgetary overspend</b>	<p><b>Cause(s):</b></p> <p>Overspending budgets as a result of increased costs outside Council's direct control (e.g. increase in minimum wage, court / legal fees)</p> <p><b>Effect(s):</b></p> <p>Financial</p>	Economic - Strategic	4	3	12	<ul style="list-style-type: none"> <li>- Effective forward budgetary planning</li> <li>- On-going engagement with stakeholders</li> <li>- On-going management of costs, demand forecasting, allocation of existing resources</li> </ul>	3	3	9	Identify "risk areas" (eg identify source of funding before committing resources, looking at flexible resourcing, growing our own talent by recruiting at lower grades, managing contracts proactively)	Director of Corporate Services
11	Corporate Services	<b>Failure to follow Legal Advice</b> Breach of law, statutory duty or carrying out inadequate consultation arising from failure of clients to follow Legal briefing procedures	<p><b>Cause(s):</b></p> <p>Advice not being sought and/or followed by clients.</p> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Breach of statutory obligations through failure of compliance with relevant legislation (e.g. 'Duty to Consult', EU Procurement Rules, Health and Safety etc.) leading to adverse publicity and significant costs including fines.</li> <li>- Council making unlawful decisions</li> <li>- Potential compensation to injured parties</li> <li>- Negative publicity</li> <li>- Potential judicial reviews</li> </ul>	Legal - Operational	3	3	9	<ul style="list-style-type: none"> <li>- Service procurement procedures reviewed for robustness</li> <li>- Register of all relevant statutory requirements</li> <li>- Regular review of compliance</li> <li>- Effective training of managers in requirements of relevant legislation</li> <li>- Systematic consultation</li> <li>- Robust internal customer service standards and service delivery meetings</li> <li>- Continuous learning and feedback</li> <li>- Statutory requirements (awareness and training)</li> </ul>	2	3	6		Director of Corporate Services
12	Corporate Services	<b>Data Protection Breach</b>	<p><b>Cause(s):</b></p> <p>Failure to adapt to the upcoming change in legislation (GDPR) Failure to ensure the confidentiality, integrity, and availability of information assets.</p> <p><b>Effect(s):</b></p> <ol style="list-style-type: none"> <li>1. Distress and/or physical impact on wellbeing of customers</li> <li>2. Impact on operational integrity</li> <li>3. Reputational damage to services and the authority as a whole</li> <li>4. Liability in law</li> <li>5. Economic damage to authority and/or customers</li> <li>6. Impact on service take up due to reduced confidence from the public</li> </ol>	Data and Information - Operational	4	5	20	<ul style="list-style-type: none"> <li>- LBB is currently compliant with the Public Services Network Code of Connection (PSN CoCo) and Connecting for Health Information Governance Toolkit (CfH IGT). The LBB Information Governance Board formally accepted the CfH IGT as the basis of LBB's internal information governance program at their meeting in August 2012. Both standards are based on the ISO27001 international best practice standard for managing information security and are therefore fit for purpose for assessing and managing the Council's information risk</li> <li>- <b>GDPR Training programme in place</b></li> <li>- <b>Induction programme in place</b></li> <li>- <b>Additional resources to manage risk</b></li> </ul>	2	3	6		Director of Corporate Services
13	Corporate Services	<b>Failure to publish Register of Electors</b>	<p><b>Cause(s):</b></p> <p>Failure of IT systems Insufficient resources provided to Electoral Registration Officer to deliver a comprehensive canvass Failure to follow legislative and regulatory requirements</p> <p><b>Effect(s):</b></p> <p>Disenfranchisement of local residents Potential to challenge any election which relies on an inadequate register Reputational damage</p>	Political - Strategic	2	3	6	<p><b>Controls:</b></p> <ol style="list-style-type: none"> <li>1. Project Plan including detailed Risk Register</li> <li>2. Robust documented internal procedures</li> <li>3. Monitoring by Electoral Commission through appropriate Performance Standards</li> </ol>	1	3	3		Carol Ling
14	Corporate Services	<b>Failure to manage election process</b>	<p><b>Cause(s):</b></p> <p>Failure of Council in its duty to provide sufficient resources to the Returning Officer Failure of IT systems</p> <p><b>Effect(s):</b></p> <p>Costs of dealing with a challenge to election process Reputational damage Cost of re-running an election if result is set aside</p>	Political	3	4	12	<ul style="list-style-type: none"> <li>- Project Plan including detailed Risk Register specific to election underway</li> <li>- Staff Training</li> <li>- Adequate insurance (Returning Officer - personal liability)</li> <li>- Monitoring by Electoral Commission through appropriate Performance Standards.</li> </ul>	2	3	6		Carol Ling

## Corporate Services Risk Register - Appendix B

											DATE LAST REVIEWED:	06/05/2022	
REF	DIVISION	RISK TITLE & DESCRIPTION <small>(a line break - press alt &amp; return - must be entered after the risk title)</small>	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING <small>(See next tab for guidance)</small>			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING <small>(See next tab for guidance)</small>			FURTHER ACTION REQUIRED	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
15	Corporate Services	<b>Ineffective governance and management of contracts</b>	<p><b>Cause(s):</b></p> <ol style="list-style-type: none"> <li>1. Lack of awareness and/or non-compliance with Public Contracts Regulations 2015 and Councils Contract Procedure Rules.</li> <li>2. Lack of awareness and/or non-compliance with decision making and scrutiny requirements.</li> <li>3. Insufficient engagement with key support services such as Corporate Procurement, Finance and Legal.</li> <li>4. Poor planning / lack of timely action for commissioning and procurement activities.</li> <li>5. Poor record keeping of contracts and contract documentation.</li> <li>6. Insufficient or unclear arrangements for client side contract management and monitoring resource.</li> <li>7. Failure to undertake a suitable and proportionate contract management and monitoring plan.</li> <li>7. Failure of a contractor / partner / provider to maintain agreed service levels resulting in an interruption to or deterioration of service delivery.</li> </ol> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Failure to ensure Value for Money</li> <li>- Procurement challenges / complaints leading to delays and potential additional costs</li> <li>- Reputational risk</li> <li>- Service disruptions</li> <li>- Contracts do not deliver expected outcomes or deliver sufficient quality</li> <li>- Increased cost and resource to manage contract issues</li> <li>- Failure to achieve our Making Bromley Even Better priorities.</li> </ul>	Contract Management  Contractual and Partnership	3	4	12	<ul style="list-style-type: none"> <li>- Contract Procedure Rules and regular Practice / Guidance notes to all Contract Owners</li> <li>- Review of contract management and contract monitoring controls including any issues identified by internal audit</li> <li>- Contracts Database and Quarterly Contracts Database Report to all relevant Committees</li> <li>- Procurement Board oversight</li> <li>- Member scrutiny including regular Contract Monitoring Reports for £500k+ contracts</li> <li>- Regular programme of training delivery to staff</li> <li>- Quarterly Contract Owners meetings</li> <li>- Recent Audit (Substantial Assurance) demonstrates current effectiveness</li> </ul>	2	4	8	<ul style="list-style-type: none"> <li>- Contract Management guidance on toolkit to be reviewed</li> <li>- Ongoing training delivery</li> <li>- Improve compliance with annual Contract Monitoring Requirement</li> <li>- Sample check of Contracts Database and supporting documentation to assess compliance</li> <li>- Sample check of contract management and contract monitoring arrangements across Council</li> <li>- ongoing and repeated high profile key messaging across the Council and monitoring of compliance</li> </ul>	Service Directors supported by Assistant Director, Governance and Contracts
16	Corporate Services	<b>Ineffective governance and management of contracts - Contracts Database</b>	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Lack of compliance from contract managers</li> <li>- Unclear ownership</li> <li>- Lack of governance</li> <li>- Poor awareness and/or understanding of the Database</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Impacts upon decision making and outcomes</li> <li>- Poor quality data</li> <li>- Failure to meet transparency obligations</li> </ul>	Contract Management  Contractual and Partnership	3	2	6	<ol style="list-style-type: none"> <li>1. Database guidance issued to officers; training available</li> <li>2. Regular monitoring of CDB by Procurement Team</li> <li>3. Quarterly reporting to Members</li> <li>4. Procurement Board</li> <li>5. Regular sample checks of data quality and completeness</li> </ol>	2	2	4	<ol style="list-style-type: none"> <li>1. Regular reminders to Contract Owners - ongoing</li> <li>2. Regular monitoring and chase ups by Procurement Team - ongoing</li> <li>3. Regular sample checks of CDB data with reports to COE and follow up actions identified</li> </ol>	Assistant Director, Governance and Contracts

Remember to consider current Internal Audit priority one recommendations when identifying, assessing and scoring risks.

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## Finance Risk Register - Appendix C

REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press alt & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			DATE LAST REVIEWED:	27/06/2022
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING	FURTHER ACTION REQUIRED	RISK OWNER
1	Finance	<b>Failure to ensure sufficient cover of Council assets</b> This could result in the possibility of our insurance company refusing to cover a claim above the level of our current excess (£125k for general property and Liability, £250k for educational property).	<b>Cause(s):</b> 1. Incorrect/incomplete asset/risk data provided to insurer. 2. Total level of insurance insufficient e.g. to cover damage to multiple high value assets. 3. Uninsurable risks e.g. criminal/regulatory fines. <b>Effect(s):</b> Inadequate or no insurance cover could have significant financial implications, dependent on the value of the asset and the extent of the damage / loss.	Financial - Operational	1	4	4	1. Annual review during renewal process of all property, vehicle and school journey schedules 2. Maintain a register of all insurance premiums paid each year 3. Independent review of Council's self-insurance Claims fund by professional actuaries every 3 years 4. Endorsement under buildings insurance policy to cover up to £10m for inadvertent omission to insure property 5. Buildings insurance policy excess per event to protect Council for damage to multiple properties as a result of single event e.g. Flood/Storm	1	3	3		Viknesh Gill
2	Finance	<b>Financial Market Volatility</b> Financial loss arising from the volatility of financial markets.	<b>Cause(s):</b> Market volatility, recession, banking failure <b>Effect(s):</b> We do not maximise our interest earnings on balances and could also suffer the following issues - Liquidity, Interest rate, Exchange rate, Inflation, Credit and counterparty, Refinancing, legal and regulatory risks	Financial - Operational	3	5	15	1. Regular strategy meetings 2. Use of external advisors 3. Internal Audit review of activities 4. Quarterly reporting to E,R&C PDS Committee (Members) 5. Adoption of CIPFA Treasury Management Code of Practice 6. Regular meetings / discussions with external auditors 7. Treasury management strategy	2	4	8		David Dobbs
3	Finance	<b>Capital Financing Shortfall</b> Inability to finance the Capital programme	<b>Cause(s):</b> Property price reductions as a result of the economic environment. Falling number of assets available for disposal Significant increase in cost of capital schemes due to inflation and supply issues requiring an increase in funding <b>Effect(s):</b> Financial	Economic - Strategy	4	4	16	1. Close monitoring of spend and income 2. Reporting to Members 3. Tight control of spending commitments 4. Quarterly reports on capital receipts (actual and forecast) to Executive.	3	3	9		David Dobbs
4	Finance	<b>Pension Fund</b> The pension fund not having sufficient resources to meet all liabilities as they fall due	<b>Cause(s):</b> 1. Investment markets fail to perform in line with expectations 2. Market yields move at a variance with assumptions 3. Investment managers fail to achieve their targets over the longer term 4. Longevity horizon continues to expand. Although the triennial valuation reported that the Council's pension fund is fully funded, there is a need to address a future risk of the pension fund not having sufficient resources 5. Deterioration in pattern of early retirements 6. Administering authority unaware of structural changes in an employer's membership e.g. large fall in employee members, large number of retirements 7. Pooling of investments (London CIV) may result in appointment of poorer performing investment managers. 8. Uncertainty in financial markets due to Ukraine situation and possible future de-globalisation which can impact on performance <b>Effect(s):</b> Financial	Financial - Operational	3	5	15	1. Use of external advice. 2. Financial: Monitoring of investment returns - analysis of valuation reports 3. Demographic: Longevity horizon monitored at triennial reviews - quarterly review of retirement levels 4. Regulatory: Monitor draft regulations and respond to consultations - actuarial advice on potential where appropriate 5. Internal audit review of activities, performance, controls etc. 6. Quarterly reports to Pensions Investment Sub-Committee 7. Funding Strategy Statement 8. Statement of Investment Principles 9. Communications Policy 10. Governance Policy 11. Triennial valuation by actuary 12. Strategic asset allocation review.	2	4	8		Director of Finance
5	Finance	<b>Failure to deliver a sustainable Financial Strategy which meets with Making Bromley Even Better priorities and failure of individual departments to meet budget</b>	<b>Cause(s):</b> 1. The 2022/23 Draft Budget report to Executive identified the need to reduce the Council's 'budget gap' of £19.5m per annum by 2025/26. The Council received a one-year financial settlement for 2022/23, which creates uncertainty on funding levels for future years. 2. The fundamental review of local government funding through the Fair Funding Review and Business Rate review has been delayed until at least 2023/24 which adds to financial uncertainty in considering the impact on the financial forecast for 2023/24 to 2025/26. A significant challenge to the future year's financial position relates to the ongoing impact of the Covid 19 situation and the uncertainty relating to the cost implications of the 'new normal'. The Adult Social Care reforms could also result in potential additional costs of between £10m and £15m per annum which is not reflected in the 'budget gap' identified above. Further details are included in the Draft 2022/23 Budget and Update on the Council's Financial Strategy 2023/24 to 2025/26 report to Executive on 12th January 2022 and 2022/23 Council Tax report of 9th February 2022. More recent challenges include the impact of inflation which is at its highest level for 40 years which was not fully reflected in the 2022/23 budget. 3. Failure to meet departmental budgets due to increased demand on key services resulting in overspends: Housing (homelessness and cost of bed and breakfast); Adult Social Care (welfare reform and ageing population); Children's Social Care, Education (central costs and high needs transport), Waste (growing number of households) and limited delivery of planned mitigation savings. 4. The risk of the Council not being able to carry out its statutory duties (e.g. pupil admissions, school improvement, child protection) as a consequence of funding pressures not being met. 5. Dependency on external grants to fund services (schools and housing benefits are ring-fenced) - effect if grant reduces (Public Health services) or ceases. 6. Increases in national living wage will have cost implications to the Council over the next few years (e.g. care providers and carers) as well as the increase on national insurance (employers costs). 7. Local government may be required to take on new funding responsibilities in the future without adequate funding. 8. Impact of welfare reforms and the phased roll out of Universal Credit. 9. Failure to identify and highlight frauds and weaknesses in the system of internal control (which invariably have a financial impact). Overall, fraud losses are mainly benefit related (Council Tax Support / Single Person Discount). 10. Significant increases to inflation which exceeds the 2022/23 budget provision <b>Effect(s):</b> - Increased overspends in particular services - Council unable to carry out its statutory duties due to services cuts - Reputational damage	Financial - Operational	5	5	25	<b>Strategic Controls:</b> 1. Regular update to forward forecast 2. Ongoing monitoring of impact of COVID situation and trends re 'new normal' 3. Regular analysis of funding changes and new burdens particularly on Covid situation and full year impact 4. Early identification of future savings required 5. Transformation options considered early in the four year forward planning period 6. Budget monitoring to include action from relevant Director to address overspends including action to address any full year additional cost 7. Mitigation of future cost pressures including demographic changes 8. Quarterly review of growth pressures and mitigation 9. Continue to progress with opportunities for the Transformation Reviews towards meeting future years' budget gap. <b>Operational Controls:</b> 1. Management of Risks document covering inflation, capping, financial projections etc. attached to budget reports 2. Departmental risk analysis 3. Reporting of financial forecast updates in year to provide an update of financial impact and action required 4. Obtain monthly trend / current data to assist in any early action required 5. Obtain regular updates / market intelligence 6. Reporting full year effect of budget variations 7. Analysis of government plans and changes	4	5	20	The Council continues to explore transformation opportunities to help meet the ongoing budget gap	Director of Finance
6	Finance	<b>Failure to act upon Financial assessments or arrears in a timely manner</b>	<b>Cause(s):</b> 1. Severe/catastrophic IT problems 2. Loss of key staff 3. Organisation experiencing severe financial problems <b>Effect(s):</b> Loss of income	Financial - Operational	3	3	9	<b>Controls:</b> 1. There is a disputed debt process and escalation process that is followed to ensure that departments do not hold up debt recovery (i.e. actioning write offs and disputes). 2. All outstanding Financial Assessments are completed in accordance with the agreed timescales 3. Monitoring is carried out on a regular basis to ensure financial assessments are completed and contributions are set up on the system in order for service users to be charged 4. Effective SLA is in place	2	3	6		Claudine Douglas-Brown
7	Finance	<b>Failure of Finance IT systems</b>	<b>Cause(s):</b> Failure of Liquidlogic/LIFT/ContrOCC Failure of Oracle Failure of BACs to pay LBB <b>Effect(s):</b> Inability to pay creditors, calculate payments due to our suppliers / foster carers (Payments Team) or to accommodate charging information for billing clients which could result in fines, penalties and loss of goodwill / reputation.	Contractual and Partnership - Operational	3	2	6	1. Liquidlogic/LIFT/ContrOCC has replaced CareFirst for Care Services payments, financial assessments and charging 2. All systems are backed up daily 3. If systems fail, details of previous payments can be used to make payments with reconciliations carried out when the system is made available again. 4. Manual cheque payments could be raised 5. Close liaison with Liberata (and the system support team) to discuss any problems - escalation procedure works well. 6. Alternative printers being available at Xerox reduces the risk of cheques not being produced due to printer failure 7. Stock control measures in place to ensure cheques are ordered in time 8. BACS payments increasing - solid and dependable	2	2	4	Resolution of issues logged relating to Liquidlogic/LIFT/ContrOCC are being monitored closely, and preventative action taken to mitigate risk	Claudine Douglas-Brown
8	Finance	<b>Failure of external contractors</b>	<b>Cause(s):</b> Contractor ceases to trade due financial failings. <b>Effect(s):</b> disruption and delays to key services, financial loss and adverse publicity	Contractual and Partnership - Operational	3	4	12	1. Constant review of contractors financial standing 2. Maintaining knowledge and contact with alternative service suppliers	2	3	6		Claudine Douglas-Brown
9	Finance	<b>Contractor Poor Performance</b> Contractor fails to meet performance expectations across Revs & Bens, Payroll, Pensions, Debtors and Accounts Payable	<b>Cause(s):</b> Severe catastrophic IT problems Loss of key staff Organisation experiencing severe financial problems <b>Effect(s):</b> - Delay / non payment of suppliers, customers, staff salaries, pensions. - Delay in assessment and payment of benefit claims - Increase in fraudulent payments - Delayed or non repayment from debtors Resulting in loss of income, loss of HB Subsidy, increased costs, increase in complaints and subsequent loss of good will and / or reputational damage.	Financial - Operational	3	3	9	1. Effective SLAs and contracts in place with a regime of KPIs, service credits and default notices in place 2. Regular operational and strategic meetings monitoring progress and identifying action required 3. Action identified and formally agreed when monitoring key performance areas 4. Formal structures and procedures in place for monitoring and corrective action to minimise risk 5. Process reviewed on an ongoing basis 6. Weekly monitoring of complaints and patterns identified	2	3	6		Claudine Douglas-Brown

## Finance Risk Register - Appendix C

REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press alt & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			DATE LAST REVIEWED:	27/06/2022
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING	FURTHER ACTION REQUIRED	RISK OWNER
10	Finance	<b>Significant Fraud/Corruption</b>	<b>Cause(s):</b> Lack of controls Dishonest staff/suppliers/customers Collusion Poor systems Lack of Management oversight Inadequate segregation of duties  <b>Effect(s):</b> Financial loss Adverse publicity/reputational damage Staff morale lowered Resource implications for investigation	Financial - Operational	3	3	9	1. Staff vetting 2. Segregation of duties 3. Documented procedures/regulations/code of conduct 4. Whistleblowing policy 5. Fidelity guarantee 6. IT security 7. Robust computer systems/audit trail 8. Counter Fraud staff 9. Internal/External audit	2	2	4		Francesca Chivers
11	Finance	<b>Failure to comply with the grant conditions</b> and ensure effective utilisation of the significant Government funding received, relating to the Covid pandemic to support businesses	<b>Cause(s):</b> 1. Appropriate processes and controls not put in place for administering the various business grant schemes 2. The criteria of the various schemes is not applied correctly 3. Full training and guidance is not provided to those administering the scheme and making payments 4. Lack of governance and oversight of the various schemes  <b>Effect(s):</b> - Payments are not made timely leading to severe financial difficulty for a business and possible insolvency - Fraudulent payments are made - Payments are made to businesses who do not meet the qualifying criteria - Payments are made in error e.g. to the wrong bank account or individual - Unused funding has to be returned to Government - Complaints / adverse publicity / reputational damage	Financial - Operational	4	5	20	- Training, guidance and advice provided to all those involved in administering the schemes (with Internal Audit involvement) - Regular and ad-hoc meetings between key personnel to ensure governance and oversight and agree any actions required - Fraud risk assessments and pre-payment and post-payment controls to identify and address any instances of fraud, error or non-compliance - Faster payments solution utilised for Covid related grant payments, ensuring same day receipt of funds by recipient.	3	3	9		Director of Finance
12	Finance	<b>Impact on staff resources</b> undertaking business as usual as well as significant demands to provide the support required to the Covid-19 Pandemic (omicron) .	<b>Cause(s):</b> 1. Staff directed from 'business as usual'  <b>Effect(s):</b> - Less available time and resources to administer functions, leading to an impact on delivery of the Council's key objectives e.g. possible delay in payments made for goods and services, delay in recovering income not received. - Complaints / reputational damage - Increased stress amongst existing staff resulting in mental health issues and / or increased levels of sickness	Personnel / Operational	4	3	12	- Regular one to one meetings with staff and ad-hoc conversations to discuss and prioritise workloads, identify and address any areas of concern. HR policies, guidance and occupational health support and advice. - Heads of Finance have been given the option of utilising agency/interim resources to mitigate Covid related workloads - Regular and ongoing publicity of staff wellbeing programme to help identify and address Covid related stress issues	3	3	9		Director of Finance

Remember to consider current Internal Audit priority one recommendations when identifying, assessing and scoring risks.

## Human Resources and Customer Services Risk Register - Appendix D

											DATE LAST REVIEWED:	03/05/2022	
REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press alt & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			FURTHER ACTION REQUIRED	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
1	Human Resources	<b>Ability to respond to industrial action, changes in government initiatives or legal requirements</b>	<b>Cause(s):</b> - Changes to staff terms and conditions (localisation agenda) - Lack of flexibility of workforce - Poor horizon scanning and networking's  <b>Effect(s):</b> - Increased costs (bank / agency usage) - Reputation damage - Impacts on service delivery	Political	2	2	4	1. Early and effective engagement with staff and trade unions 2. Sound internal and external legal advice 3. Identifying appropriate legal options 4. Pro-active intelligence gathering via London Councils and other networks 5. HR processes in place for dealing with industrial action	2	2	4	1. Submitting timely proposals to Chief Officers and / or members of the Industrial relations committee.	Director of HR, Customer Services and Public Affairs
2	Human Resources	<b>Failure to comply with HR related legislative requirements e.g. Equalities Act 2010</b>	<b>Cause(s):</b> - Lack of awareness with legislation - Failure to effectively consult staff where appropriate - Indirect / direct discrimination - Human error / lack of understanding - Lack of capacity and capability to deliver  <b>Effect(s):</b> - Reputation damage - Financial costs - Regulatory inspection / intervention	Legal	4	3	12	1. Bromley Council policies & procedures in place e.g.. Equality Scheme 2. Requirement to report and record accurately information e.g. equalities 3. Training in place for managers and staff to ensure they are aware of their responsibilities 4. Organisation to carry out a Capacity Risk Assessment	3	2	6	1. Professional updates / HR Mgt Team forward planning	Director of HR, Customer Services and Public Affairs
3	Human Resources	<b>1) ineffective workforce planning initiatives including succession planning, talent management. 2) upskilling of staff - lack of training resources/opportunities</b>	<b>Cause(s):</b> - Insufficient strategic management control and planning - Staff turnover (capacity) - Lack of resources  <b>Effect(s):</b> - Potential service delivery impacts - Loss of skilled/experienced staff - Missed opportunity to develop and retain talent "in house" - Recruitment Costs	Personnel / Operational	3	3	9	Clear workforce planning strategy in place, including - Graduate Intern Scheme - Apprenticeship Scheme - Career Pathway - Leadership Development Programme - Succession Planning Tool - Kickstart	2	2	4	Review of  1.'Development of a Talent Management Strategy. 2. Ensure that Apprenticeship Levy funds are utilised effectively 3. Consideration to resurrect 'Future Leaders Programme'	Director of HR, Customer Services and Public Affairs
4	Human Resources	<b>Ineffective recruitment and retention strategies for hard to fill posts e.g. Adult's Social Workers, Children's Social Workers, Housing, Planning, Building Control</b>	<b>Cause(s):</b> - Physical environment/hygiene facilities - Culture - Increasingly fluid market - Increases in demand and/or reductions in supply - Lack of experienced staff in the labour pool - Budget constraints - Lack of leadership  <b>Effect(s):</b> - Potential service delivery impacts - Increased costs due to use of agency workers - Reduction in quality of service	Personnel / Operational	4	3	12	1. Horizon scanning to anticipate changes and trends to staff complement 2. Keeping up to date on national trends for hard to recruit professions 3. Case load review 4. Review of pay and comparison with neighbouring LAs 5. R&R Board to regularly review 6. No Quit Policy in place 7. Implement grow your own initiatives e.g. senior practitioners progression pathway, training pathways for social workers, graduate trainees, apprentices	2	2	4	Review of retention strategies  1.'Development of a Talent Management Strategy. 2. Ensure that Apprenticeship Levy funds are utilised effectively 3. Consideration to resurrect 'Future Leaders Programme'	Director of HR, Customer Services and Public Affairs

## Human Resources and Customer Services Risk Register - Appendix D

											DATE LAST REVIEWED:	03/05/2022	
REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press alt & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			FURTHER ACTION REQUIRED	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
5	Human Resources	Ineffective pre-employment checks including agency workers	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Poor procedures</li> <li>- Inadequate monitoring</li> <li>- Lack of awareness / understanding</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Workers with safeguarding concerns not identified</li> <li>- Safeguarding incident occurs (harm / injury)</li> <li>- Agency worker ID fraud</li> <li>- Reputation damage</li> <li>- legal compliance implications inc. fines and sanctions</li> </ul>	Personnel / Operational	4	3	12	<ol style="list-style-type: none"> <li>1. HR Business Services carry out checks for LBB workers &amp; agencies to check agency workers.</li> <li>2. Managers check identity of candidate and of agency workers when arriving for work, with copy of DBS and proof of identity. E.g. passport, and original copy of birth certificate.</li> <li>3. Up front audits with Adecco undertaken to ensure processes are robust for agency workers</li> <li>4. Training provided for managers</li> <li>5. Internal audit undertakes a review of arrangement as part of their annual audit plan</li> </ol>	4	1	4	Consideration as to whether training should be mandatory	Director of HR, Customer Services and Public Affairs
6	Human Resources	Management of the on-going transitional and transformational changes (Commissioning process, baseline exercise and service redesigns and alternative delivery options)	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Lack of adequate financial resources</li> <li>- Lack of expertise</li> <li>- Unexpected delays</li> <li>- Changes in strategic direction</li> <li>- Lack of capacity to undertake in a timely manner</li> <li>- Conflicting priorities</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- New service models are ineffective / not fit for purpose</li> <li>- Increased costs</li> <li>- Legislative and legal requirements breached (e.g. TUPE)</li> <li>- Reduction in service quality / provision</li> <li>- Reputation damage</li> </ul>	Personnel / Operational	4	3	12	<ol style="list-style-type: none"> <li>1. Managing change procedure in place</li> <li>2. Capacity building and additional resources to support the change process</li> <li>3. Effective communication and engagement with staff and their representatives.</li> <li>4. Formal consultation processes and departmental representatives</li> <li>5. Regularly meetings include Members</li> <li>6. Terms of Reference for each workstream led by Chief Officers</li> </ol>	3	2	6	<p>One-off funding required to support transformation programmes and workstreams</p> <p>Review HR Processes in light of new working arrangements</p>	Director of HR, Customer Services and Public Affairs
7	Human Resources	HR systems failures e.g. payroll, recruitment, HR self-service, pensions	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Contractual failure</li> <li>- IT failure</li> <li>- Loss of power</li> <li>- Data breach / cyber attack</li> <li>- Ineffective business continuity plan for manual work around</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Delays or restriction in level of HR support available</li> <li>- Staff not paid</li> <li>- Staff morale reduction if for a long period</li> <li>- Delays in ability to recruit</li> <li>- Failure to apply for jobs employment/legal issues</li> <li>- Failure to comply with contractual obligations</li> <li>- Industrial action</li> </ul>	Data and Information	2	5	10	<ol style="list-style-type: none"> <li>1. Back-up payroll processes/systems</li> <li>2. Regular saving of personnel information on Resource Link</li> <li>3. Business Continuity Plan in place</li> <li>4. Internal audit carry out reviews as part of annual review programme</li> <li>5. Regular meetings with contractors and Business Continuity Plans for each contract</li> </ol>	4	2	8	None identified	Director of HR, Customer Services and Public Affairs

## Human Resources and Customer Services Risk Register - Appendix D

											DATE LAST REVIEWED:	03/05/2022	
REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press alt & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			FURTHER ACTION REQUIRED	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
8	Human Resources	<b>Ineffective compliance with IR35</b>	<b>Cause(s):</b> - Inadequate information from managers, - Non submission of requests for HR scrutiny - Non submission of approval by relevant Chief Officers, - Poor knowledge of what is required  <b>Effect(s):</b> - Huge fine by IRS - Reputational damage - IRS investigation of the authority	Financial / Legal	2	5	10	1. Clear standards and expectations are set out in the procedure/manual 2. Dedicated HR Officer with updated knowledge of IR35 requirements 3. Access to external expert advice commissioned if required 4. HR monitoring	1	3	3	- Regular awareness sessions on IR35 for managers - 6-monthly compliance report to CLT/COE - Joint HR/audit review	Director of HR, Customer Services and Public Affairs
9	Human Resources / Health & Safety	<b>Health &amp; Safety (Council)</b> <b>Ineffective management, processes and systems across all Council departments</b> Including in relation to the following areas: <b>Fire Safety</b> <b>Lone Working</b> <b>Violence &amp; Aggression at work</b>	<b>Cause(s):</b> - Inadequate risk assessments - Outdated policies - Poor use of data around accidents/near miss incidents - Lack of capacity to discharge the Council's H&S responsibilities - Ineffective monitoring of risks  <b>Effect (s):</b> - Potential prosecution of Council and / or civil claims for compensation - Increased sickness/absence - Poor staff morale - Impact on staff retention - Insurance claims - Potential accidents/fatalities - Corporate manslaughter	Health & Safety	3	5	15	1. Safety Policies reviewed and updated regularly - ongoing 2. Commitment to HSW from Chief Executive and Directors 3. Supported by H&S training programme and network of policies and procedures (regularly reviewed) 4. Property-related HSW matters now provided in-house	3	4	12	FT H&S Manager 'Risk assessment & proactive monitoring being developed for Council  Departmental Safety Committees meet regularly. Health and Safety Committee Meetings terms of reference being reviewed to ensure Senior Management Ownership  H&S audits to be undertaken by Corporate Health and Safety	Director of HR, Customer Services and Public Affairs
10	Human Resources / Health & Safety	<b>Failure to comply with H&amp;S related legislative requirements e.g. Health and Safety at Work etc. Act 1974</b>	<b>Cause(s):</b> - Lack of awareness with legislation - Failure to effectively consult staff where appropriate - Human error / lack of understanding - Lack of capacity and capability to deliver  <b>Effect(s):</b> - Reputation damage - Prosecution - Insurance claims - Financial costs - Regulatory inspection / intervention	Health & Safety/Legal	3	4	12	1. Safety Policies reviewed and updated regularly - ongoing 2. Regular updates provided to H&S committee on changes to legislation 3. Commitment to HSW from Chief Executive and Directors 4. Any areas of non-compliance identified are reported to Director of HR, Customer Services and Public Affairs 5. Holding the relevant colleagues to account for managing Council premises to required legal standards	2	4	8	-New mandatory H&S training for all staff to ensure they are aware of their responsibilities	Director of HR, Customer Services and Public Affairs
11	Customer Services	<b>Fall in income from Registrars</b> Economic downturn, uncertainty regarding accommodation and other external factors contributing to a significant fall in income in Registrars e.g. impact of covid	<b>Cause(s):</b> Uncertainty regarding accommodation Leaving Civic Centre for a less appealing venue  <b>Effect(s):</b> Reduced level of bookings Financial impact	Financial - Operational	3	3	9	- Regular budget and activity monitoring - Targeted marketing of ceremonies, venues etc. to maximise income, website videos, use of 'twitter' - Flexible use of staff to maximise income in periods of high activity - Development of civil funeral service	3	2	6		Duncan Bridgewater



## Human Resources and Customer Services Risk Register - Appendix D

											DATE LAST REVIEWED:	03/05/2022	
REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press alt & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			FURTHER ACTION REQUIRED	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
12	Customer Services	<b>Contractor Failure</b>	<b>Cause(s):</b> Contractor (such as Liberata) cease trading due to financial or other failure.  <b>Effect(s):</b> Interruption to or deterioration of service due to failure of contractors (out of hours security guards @ Civic Centre, for example)	Contractual and Partnership - Operational	2	4	8	- Regular monitoring of performance and monthly operational meetings to identify any continued and ongoing reduction in service delivery - Core contract monitoring and overview of other elements of the contract to identify shortfalls in other areas of service delivery - Effective scrutiny of potential contractors - Appropriate performance bonds or parent company guarantees - Business continuity planning - Standardised contract letting procedures and documentation as contracts renew	2	3	6	-Identify potential alternative contractors	Duncan Bridgewater
13	Customer Services	<b>Contractor Performance</b>	<b>Cause(s):</b> Failure to effectively manage service delivery contracts with provided such as Liberata  <b>Effect(s):</b> Continued and ongoing poor performance and/or increased customer complaints.	Contractual and Partnership - Operational	4	3	12	- Daily, weekly, monthly and annual monitoring of performance and key performance indicators - Monthly operational meetings with contractor to discuss performance and monitor against balanced score card - Escalation through core contract route of any continued and ongoing shortfalls in performance	3	2	6		Duncan Bridgewater
14	Customer Services	<b>Maintenance of Statutory and GRO standards</b>	<b>Cause(s):</b> Increase in life events (births / deaths) within Bromley Staffing pressures  <b>Effect(s):</b> Drop in standards leading to a potential breach of statutory duty and loss of confidence from residents.	Legal - Operational	3	3	9	-Regular monitoring of registration activity and timescales -use of casual staff to perform statutory registrations - close monitoring of quality and performance from GRO system reporting Annual report produced in Spring	1	3	3		Duncan Bridgewater
15	Customer Services	<b>Loss of Facility</b> Loss of customer service accommodation as a result of a major power failure or other incident that prevents access to the Civic Centre	<b>Cause(s):</b> Major power failure or other incident that prevents access to the Civic Centre  <b>Effect(s):</b> Major disruption to council services	Data and Information - Operational	3	3	9	- Existing local resilience procedures (overflow to alternative Liberata Office)  Considered as part of the overall corporate business continuity plan if temporary accommodation required	2	2	4		Duncan Bridgewater
16	Customer Services	<b>Safety of Statutory Records</b>	<b>Cause(s):</b> Fire / flooding Strong room not GRO compliant  <b>Effect(s):</b> Damage to or destruction of historic statutory registration records	Operational	2	4	8		2	4	8	- We are aware the strong rooms requires investment to bring it up to General Register Office (GRO) security standards. This will be looked at during he wider accommodation review	Duncan Bridgewater

Remember to consider current Internal Audit priority one recommendations when identifying, assessing and scoring risks.

## Corporate Risk Register - Appendix E

REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press shift & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			DATE COMPLETED:	29/06/2022
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
					FURTHER ACTION REQUIRED						RISK OWNER		
1	Corporate Risk	Failure to deliver a sustainable Financial Strategy which meets with Making Bromley Even Better priorities and failure of individual departments to meet budget	<p><b>Cause(s):</b></p> <ol style="list-style-type: none"> <li>The 2022/23 Draft Budget report to Executive identified the need to reduce the Council's 'budget gap' of £19.5m per annum by 2025/26. The Council received a one-year financial settlement for 2022/23, which creates uncertainty on funding levels for future years.</li> <li>The fundamental review of local government funding through the Fair Funding Review and Business Rate review has been delayed until at least 2023/24 which adds to financial uncertainty in considering the impact on the financial forecast for 2023/24 to 2025/26. A significant challenge to the future year's financial position relates to the ongoing impact of the Covid-19 situation and the uncertainty relating to the cost implications of the 'new normal'. The Adult Social Care reforms could also result in potential additional costs of between £10m and £15m per annum which is not reflected in the 'budget gap' identified above. Further details are included in the Draft 2022/23 Budget and Update on the Council's Financial Strategy 2023/24 to 2025/26 report to Executive on 12th January 2022 and 2022/23 Council Tax report of 9th February 2022. More recent challenges include the impact of inflation which is at its highest level for 40 years which was not fully reflected in the 2022/23 budget.</li> <li>Failure to meet departmental budgets due to increased demand on key services resulting in overspends: Housing (homelessness and cost of bed and breakfast); Adult Social Care (welfare reform and ageing population); Children's Social Care, Education (central costs and high needs transport); Waste (growing number of households) and limited delivery of planned mitigation savings.</li> <li>The risk of the Council not being able to carry out its statutory duties (e.g. pupil admissions, school improvement, child protection) as a consequence of funding pressures not being met.</li> <li>Dependency on external grants to fund services (schools and housing benefits are ring-fenced) - effect if grant reduces (Public Health services) or ceases.</li> <li>Increases in national living wage will have cost implications to the Council over the next few years (e.g. care providers and carers) as well as the increase on national insurance (employers costs).</li> <li>Local government may be required to take on new funding responsibilities in the future without adequate funding.</li> <li>Impact of welfare reforms and the phased roll out of Universal Credit.</li> <li>Failure to identify and highlight frauds and weaknesses in the system of internal control (which invariably have a financial impact). Overall, fraud losses are mainly benefit related (Council Tax Support / Single Person Discount).</li> <li>Significant increases to inflation which exceeds the 2022/23 budget provision.</li> </ol> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>Increased overspends in particular services</li> <li>Council unable to carry out its statutory duties due to services cuts</li> <li>Reputational damage</li> </ul>	Finance Financial	5	5	25	<ul style="list-style-type: none"> <li>Regular update to forward forecast</li> <li>Ongoing monitoring of impact of COVID situation and trends re 'new normal'</li> <li>Regular analysis of funding changes and new burdens particularly on Covid situation and full year impact</li> <li>Early identification of future savings required</li> <li>Transformation options considered early in the four year forward planning period</li> <li>Budget monitoring to include action from relevant Director to address overspends including action to address any full year additional cost</li> <li>Mitigation of future cost pressures including demographic changes</li> <li>Quarterly review of growth pressures and mitigation</li> <li>Continue to progress with opportunities for the Transformation Reviews towards meeting future years' budget gap.</li> </ul>	4	5	20	The Council continues to explore transformation opportunities to help meet the ongoing budget gap	Director of Finance
2	Corporate Risk	Failure to deliver partial implementation of Health and Social Care Integration	<p><b>Cause(s):</b></p> <ol style="list-style-type: none"> <li>Difficulty in achieving rapid change in a system as complex as health and social care.</li> <li>Rising social care costs due to ageing population and people living longer with increasing complex needs.</li> <li>The need to keep focus on local / place priorities rather than being driven by priorities at SEL level</li> <li>The need to maintain a focus on statutory responsibilities for local government while change is taking place</li> </ol> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>Failure to deliver statutory duties</li> <li>Failure to achieve our Building a Better Bromley priorities.</li> </ul>	Financial Compliance/ Regulation	2	3	6	<ul style="list-style-type: none"> <li>Continued work with health partners to deliver transformation programmes across the whole system, ensuring best use is made of joint resources</li> <li>New governance structure between LBB and BCCG with links to emerging SEL ICS governance</li> <li>Joint Assistant Director of Integrated Commissioning in post since April 2020; opportunities for further integrated posts to be explored in line with service priorities.</li> <li>Using the learning from the Health and care whole systems response to the COVID-19 pandemic to deliver joined up responses to the population.</li> </ul>	2	2	4	Ongoing discussions around the developing Integrated Care System with Bromley CCG; taking learning from the joint health and care response to the COVID-19 pandemic	Director of Adult Services
3	Corporate Risk	Failure to manage change and maintain an efficient workforce to ensure that MBEB priorities are met	<p><b>Cause(s):</b></p> <ol style="list-style-type: none"> <li>The on-going need to reduce the size and change the shape of the organisation to secure priority outcomes within the resources available.</li> <li>Having the right people in place by implementing effective recruitment and retention strategies.</li> <li>Potential skills gap and deterioration of service quality through loss of experienced staff as a result of age profile of workforce and downsizing (failure to succession plan).</li> <li>Disruption while services realigned and staff appointed to new structure.</li> <li>Increasing demands and pressures on remaining staff given increased customer expectation levels, could lead to morale issues.</li> <li>Increased potential for internal controls to be bypassed due to flatter reporting structure.</li> <li>Lack of capacity to lead projects / manage change agenda and consequent ability to respond to change initiatives and the achievement of outcomes and benefits.</li> <li>Potential future shortage of professionally qualified practitioners in key areas, particularly around the Safeguarding agenda.</li> <li>Need to ensure that relevant staff have necessary disciplines to drive improvement and enable good practice and consistency in delivering change and the achievement of outcomes and benefits e.g. risk and performance management.</li> <li>Adverse industrial relations climate with individual and collective grievances including trade disputes with the unions, causing some disruptions to vital Council services.</li> <li>Increasing number of employment tribunal cases causing financial and administrative inconveniences.</li> <li>Having the right buildings and facilities to support fewer, more professional, differently organised staff.</li> <li>The need to track continued changes to government strategy and policies coupled with changes in legislation to avoid compliance issues (approx. 1,300 statutory duties).</li> <li>Adequacy of consultation on issues that affect residents across the borough i.e. re-organisation of libraries, Biggin Hill expansion.</li> <li>Adverse external audit comment and resulting ratings in relation to 'excellent in the eyes of local people'.</li> </ol> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>Skill gaps</li> <li>Deterioration of service quality through loss of experienced staff</li> <li>Disruption while services are realigned</li> <li>Weaker internal controls</li> </ul>	Organisational Change Personnel	4	2	8	<ul style="list-style-type: none"> <li>Continuously address the recruitment and retention of key individuals in critical posts.</li> <li>Effective succession planning and grow your own initiatives, and using the Apprenticeship Levy to address recruitment challenges in the medium-long term</li> <li>Ensure the organisation has the HR capacity and employment law expertise to manage change.</li> <li>Address the transformational and transitional capabilities (including leadership) required for a successful commissioning journey/process.</li> <li>Provide adequate resources to support and improve staff engagement and communications.</li> </ul>	4	2	8		Director of Human Resources and Customer Services
4	Corporate Risk	Ineffective governance and management of contracts	<p><b>Cause(s):</b></p> <ol style="list-style-type: none"> <li>Lack of awareness and/or non-compliance with Public Contracts Regulations 2015 and Councils Contract Procedure Rules.</li> <li>Lack of awareness and/or non-compliance with decision making and scrutiny requirements.</li> <li>Insufficient engagement with key support services such as Corporate Procurement, Finance and Legal.</li> <li>Poor planning / lack of timely action for commissioning and procurement activities.</li> <li>Poor record keeping of contracts and contract documentation.</li> <li>Insufficient or unclear arrangements for client side contract management and monitoring resource.</li> <li>Failure to undertake a suitable and proportionate contract management and monitoring plan</li> <li>Failure of a contractor / partner / provider to maintain agreed service levels resulting in an interruption to or deterioration of service delivery.</li> </ol> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>Failure to ensure Value for Money</li> <li>Procurement challenges / complaints leading to delays and potential additional costs</li> <li>Reputational risk</li> <li>Service disruptions</li> <li>Contracts do not deliver expected outcomes or deliver sufficient quality</li> <li>Increased cost and resource to manage contract issues</li> <li>Failure to achieve our Making Bromley Even Better priorities.</li> </ul>	Contract Management Contractual and Partnership	3	4	12	<ul style="list-style-type: none"> <li>Contract Procedure Rules and regular Practice / Guidance notes to all Contract Owners</li> <li>Joint Assistant Director of Integrated Commissioning in post since April 2020; opportunities for further integrated posts to be explored in line with service priorities.</li> <li>Review of contract management and contract monitoring controls including any issues identified by internal audit</li> <li>Contracts Database and Quarterly Contracts Database Report to all relevant Committees</li> <li>Procurement Board oversight</li> <li>Member scrutiny including regular Contract Monitoring Reports for £500k+ contracts</li> <li>Regular programme of training delivery to staff</li> <li>Quarterly Contract Owners meetings</li> <li>Recent Audit (Substantial Assurance) demonstrates current effectiveness</li> </ul>	2	4	8	<ul style="list-style-type: none"> <li>Contract Management guidance on toolkit to be reviewed</li> <li>Ongoing training delivery</li> <li>Improve compliance with annual Contract Monitoring Requirement</li> <li>Sample check of Contracts Database and supporting documentation to assess compliance</li> <li>Sample check of contract management and contract monitoring arrangements across Council</li> <li>Ongoing and repeated high profile key messaging across the Council and monitoring of compliance</li> </ul>	Service Directors supported by Assistant Director, Governance and Contracts
5	Corporate Risk	Failure to maintain and develop ICT information systems to reliably support departmental service delivery	<p><b>Cause(s):</b></p> <ol style="list-style-type: none"> <li>Need to ensure that Information systems are fit for future business purpose.</li> <li>Capacity and skill within Corporate ICT to maintain and support systems during a period of significant change and in the future.</li> <li>Increasing reliance on stability of ICT infrastructure in all areas of the Council (Lync telephony service).</li> <li>Council website now a major channel for the delivery of services (Pay for it, Apply for it, Report it).</li> <li>Adequacy of information governance data protection rules to ensure the confidentiality, integrity and availability of information assets.</li> <li>IT failure impacting on critical operational systems.</li> <li>Over the next 3 years we will need to undertake gateway reviews / procurement plans for at least 4 of the Council's business critical systems; Customer Relationship Manager, Carefirst, Housing info system and Education's Capita One system plus the main LBB website and SharePoint.</li> <li>Transfer of IT contract to new ICT 3rd party supplier.</li> </ol> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>Service disruptions</li> <li>Inability to access key systems</li> <li>Reputation damage</li> <li>Inability to support organisation change and savings targets</li> <li>Failure to achieve our Building a Better Bromley priorities.</li> </ul>	ICT Data and Information Technological	3	2	6	<ul style="list-style-type: none"> <li>Transfer of IT contract to new BT in 2016 to give greater resilience. Robust backup arrangements</li> <li>Enhanced antivirus/cyber security. tested system restoration arrangements.</li> </ul>	3	2	6	<ul style="list-style-type: none"> <li>Review data storage /hosting arrangements. Carry out at least 4 gateway reviews for major systems.</li> <li>Increase stability of ICT infrastructure including Lync.</li> </ul>	Director of Corporate Services

### Corporate Risk Register - Appendix E

REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press shift & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			DATE COMPLETED:	RISK OWNER	
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING	FURTHER ACTION REQUIRED		
6	Corporate Risk	Cyber attack and failure to comply with GDPR	<p><b>Cause(s):</b></p> <ol style="list-style-type: none"> <li>Cyber Attack through vulnerability exploitation</li> <li>Failure to comply with principles unlawful disclosure of information</li> <li>Human error</li> </ol> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>Service Disruption</li> <li>Data loss</li> <li>Inability to access systems</li> <li>ICO Fine</li> </ul>	ICT Data and Information Technological	4	5	20	<ul style="list-style-type: none"> <li>information governance training provided to all officers</li> <li>system security reviews</li> <li>ITHC/PSN Compliance</li> <li>SIEM system monitoring</li> <li>Data Protection Impact Assessments</li> <li>ongoing vulnerability management through Tenable system</li> </ul>	3	5	15	<ul style="list-style-type: none"> <li>review and implementation of retention schedule in all systems hosting data</li> <li>increased training and awareness of Cyber Security</li> <li>improved technical measures to assist Cyber Security, Data Management and Data Search</li> </ul>	29/06/2022	Service Directors supported by Assistant Director, IT
7	Corporate Risk	Failure to maintain robust Business Continuity and Emergency Planning arrangements	<p><b>Cause(s):</b></p> <ol style="list-style-type: none"> <li>Insufficient emergency Planning structure and processes</li> <li>Insufficient Business Continuity arrangements and procedures, including those of key suppliers</li> <li>Failure to fulfil obligations under the Civil Contingencies Act 2004 as a Category One Responder</li> <li>Inadequate partnership working and collaboration</li> <li>Lack of buy in from senior officers</li> <li>Lack of testing and exercising of plans and processes</li> </ol> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>Ineffective response to an emergency / business disruption</li> <li>Significantly prolonged service disruptions</li> <li>Reputational damage / loss of credibility</li> <li>Increased costs to rectify disruptions</li> <li>Injury / harm</li> <li>Failure to fulfil statutory duties in a timely manner</li> </ul>	Business Continuity Physical Reputational	4	3	12	<ul style="list-style-type: none"> <li>Corporate business continuity management programme established</li> <li>Full suite of Business Continuity plans in place at service level across all Directorates</li> <li>Overarching Corporate Business Continuity plan developed identifying prioritisation of all services</li> <li>Corporate Major Emergency Response plan in place</li> <li>On call rota for Emergency Response Manager and at Director level</li> <li>Ongoing training, testing and exercising programme</li> </ul>	4	2	8	<ul style="list-style-type: none"> <li>CLT to continue drive of business continuity management programme</li> <li>Reinstatement of training and testing and exercising programme post COVID response</li> <li>Further development of Business Continuity response to a Ransomware attack</li> </ul>		Director of Environment and Public Protection
8	Corporate Risk	Failure to deliver effective Children's services The Council is unable to deliver an effective children's service to fulfil its statutory obligations in safeguarding and protect those at risk of significant harm or death, sexual exploitation or missing from care	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>Local authority response to Bromley Safeguarding Children's Partnership following Wood Review.</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>Impact on life chances and outcomes for children</li> </ul>	Children's Social Care Legal, Reputational	3	5	15	<ul style="list-style-type: none"> <li>Multi Agency Bromley Children's Safeguarding Partnership (BCSP) Training programme 2022/23 has been agreed.</li> <li>Dedicated HR programme of support in place to recruit social workers to front line posts. We have recently reviewed social media publicity/Refer a Friend scheme, and overseas recruitment to ensure we have a broad and comprehensive approach.</li> <li>Scrutiny of Performance Management Framework and Indicators</li> <li>Effective procurement framework and contract monitoring arrangements to ensure acceptable quality of service provision and value for money - under review</li> <li>Quality Assurance Audit Programme continues to be in place. We have also recently added "Dip Sampling" of cases to the ways in which we are auditing quality of practice.</li> <li>Children's Services Practice Improvement Board, this meeting continues to be the key forum for discussing and evaluating the quality of practice. As of April 2022 we have a new independent chair of the board who will bring some new ideas for the Department to evaluate effectiveness.</li> <li>Continued monitoring of caseloads to keep these in line with the Bromley Caseload Promise.</li> <li>Identified training plan for qualified social workers and other professionals reviewed and updated quarterly</li> </ul>	3	4	12	<ul style="list-style-type: none"> <li>Phase 3 'to excellence' plan continues with Performance Improvement Board (PIB) sessions continuing to be held quarterly.</li> <li>Practice review cycle has continued as has Practice Assurance Stocktakes (PAS)</li> </ul>		Director of Children's Services
9	Corporate Risk	Temporary Accommodation Inability to effectively manage the volume of people presenting themselves as homeless and the additional pressures placed on the homeless budgets	<p><b>Cause(s):</b></p> <ol style="list-style-type: none"> <li>Changes in government funding</li> <li>Rising numbers of placements (approx. 20 per month).</li> </ol> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>Failure to fulfil statutory obligations</li> <li>Impact on life chances and outcomes for individuals and families in temporary accommodation</li> <li>Increased risk of legal challenge due to provision of unsuitable accommodation (including shared accommodation)</li> <li>Pressure on other services</li> </ul>	Housing Social	5	4	20	<ul style="list-style-type: none"> <li>Focus on preventing homelessness and diversion to alternative housing options through:-</li> <li>Landlord and Tenancy advice, support and sustainment</li> <li>Assistance, (including financial aid) to access the private rented sector</li> <li>Access to employment and training</li> <li>Debt, money, budgeting and welfare benefits advice, including assistance to resolve rent and mortgage arrears</li> <li>Sanctuary scheme for the protection of victims of domestic violence</li> <li>Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money</li> <li>Implementation of the More Homes Bromley initiative to ensure the supply reduces the reliance on nightly paid accommodation</li> <li>Implementing the Homelessness Strategy - setting up the multi agency Homelessness forum and taking forward the priorities of the strategy</li> <li>New incentive campaign for private sector landlords embedded and benefits being realised</li> </ul>	4	4	16	<ul style="list-style-type: none"> <li>Approval to progress housing development schemes and reopening of the HRA. First 3 schemes now in development phases with options appraisals in place for further sites.</li> <li>Transformation Board action plan in place for next 3-4 years to increase available housing supply with an overall initial target of 1000 additional affordable homes.</li> <li>Continue to develop partnership working with private sector landlords to assist households to remain in private sector accommodation.</li> <li>Work innovatively with a range of providers to increase access to a supply of affordable accommodation.</li> <li>Continue to focus on early intervention and prevention of homelessness assessing trends in approaches to tackle main causes of homelessness.</li> <li>Beehive acquisition schemes has secured 90 new units of accommodation with Executive approval to enter into an acquisition programme with Orchard and Shipman for c250 homes.</li> </ul>		Director of Housing, Planning and Regeneration
11	Corporate Risk	Failure to deliver the Transforming Bromley Programme	<p><b>Cause(s):</b></p> <ol style="list-style-type: none"> <li>Failure to identify and put forward sufficient transformation proposals to deliver the quantum of savings required by 2022/23</li> <li>Failure to deliver appropriate mitigation of existing projected growth pressures within the financial forecast</li> <li>Failure to appropriately resource each Transforming Bromley workstream with sufficient project support and subject matter expertise to enable the identification of proposals</li> <li>Insufficient management oversight and governance arrangements to shape the delivery of proposals to enable Member decision making and inform budget setting for each financial year</li> <li>Insufficient consultation and engagement with relevant stakeholders to ensure the successful delivery of proposals.</li> <li>Additional demand pressures on council services as a direct result of the Covid-19 pandemic.</li> </ol> <p><b>Effect(s)</b></p> <ul style="list-style-type: none"> <li>Inability to address the Council's budget gap by 2024/25</li> <li>Unable to meet key commitments of the Medium Term Financial Strategy</li> </ul>	Finance Financial	4	5	20	<ol style="list-style-type: none"> <li>Robust governance process: fortnightly meetings of the Transformation Board, chaired by the Chief Executive and attended by Chief Officers</li> <li>Each Transformation Board workstream attends the Transformation Board before proposals are reviewed by Cabinet/Directors, Group, PDS Committees and the Executive.</li> <li>Each Transformation Programme Board has a Transformation Leads a to support the successful delivery of proposals</li> <li>Communications Plan is in place to enable the successful engagement with Members, staff and partners as needed</li> <li>Where transformation proposals have public law implications, an appropriate assessment will be carried out and stakeholders will be engaged.</li> <li>Each Chief Officer gives an update at their respective PDS Committee(s) on the Transforming Bromley Programme</li> <li>Transformation Fund supports the successful delivery of transformation proposals subject to a suitable business case being provided</li> <li>A review of core statutory minimum service requirements took place to enable each service area to identify where potential savings could be and to evidence that where discretionary services are delivered, they are done so on a cost-recovery basis and/or they reduce long-term dependency on higher levels of statutory intervention which generate longer term growth pressures for the Council</li> <li>All proposals will be submitted to the Executive to inform budget setting for MTF5.</li> <li>Finance provide assurances through an "are we on track" review monthly to ensure that agreed transformation programmes are on track to deliver the savings identified.</li> </ol>	3	5	15	<ul style="list-style-type: none"> <li>In the event that the Transformation Programme fails to support the successful identification of the required quantum of savings to address the Council's underlying budget gap by 2024/25, the Council will still be legally required to deliver a balanced budget as set out in the Local Government Finance Act 1988.</li> <li>If funding reductions remain and growth/cost pressures continue, these decisions are likely to have an impact on the delivery of services to our residents and service users.</li> </ul>		Chief Executive



## Corporate Risk Register - Appendix E

REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press shift & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			DATE COMPLETED:	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING	29/06/2022	
					FURTHER ACTION REQUIRED								
13	Corporate Risk	<b>Climate Change</b> Failure to adequately adapt to the impacts of Climate Change	<p><b>Cause(s)</b></p> <ol style="list-style-type: none"> <li>Lack of preparation for the severe weather events caused by climate change, including extreme heat, storms and floods.</li> <li>Insufficient staffing capacity to implement required climate adaptation and mitigation activities.</li> <li>Lack of support for council actions required to tackle climate change.</li> <li>Lack of funding to invest in climate change adaptation and mitigation measures.</li> </ol> <p><b>Effect(s)</b></p> <ul style="list-style-type: none"> <li>Service provision is disrupted by extreme weather events.</li> <li>Damage to infrastructure and local businesses.</li> <li>Reduction in environmental quality.</li> <li>Poorer health of residents attributed to extreme heating and cooling.</li> <li>In the short term, there may be reputational damage caused to the Council from perceived lack of action to tackle climate change.</li> </ul>	Corporate Health Environmental Reputational	3	4	12	<ul style="list-style-type: none"> <li>Adoption of adaptation best practice as identified through London Climate Change Partnership, UK Climate Impacts Programme, and the Local Adaptation Advisory Panel.</li> <li>Established Carbon Management Team with 3 x FTE as at September 2021.</li> <li>Established Carbon Fund, Carbon Offsetting Fund and S106 procedures in place to ensure funding availability, in addition to sourcing grant funding for Carbon initiatives in the borough.</li> <li>Implementation of LBB's Carbon Management Programme.</li> <li>Implementation of LBB's Surface Water Management Plan and Local Flood Risk Strategy.</li> <li>Establishment of Net Zero (direct) carbon emissions target for 2027 as part of a 10 year climate plan.</li> <li>Council-wide Green Recovery Working Group established to build back greener, following the COVID-19 pandemic.</li> </ul>	2	4	8	<ol style="list-style-type: none"> <li>Emergency Planning to liaise with Public Health on cross-cutting issues e.g. excess summer deaths and vector-borne diseases (which are impacted upon by extreme weather variations).</li> <li>Detailed climate action plan reviewed annually as part of the Council's ongoing Carbon Management Programme, in order to achieve net zero organisational carbon emissions by 2027.</li> <li>Roll out of Carbon Literacy Training to all staff to assist in the identification of climate change risks and opportunities at an individual, team and service level.</li> </ol>	Chief Officers' Executive
14	Corporate Risk	<b>Health &amp; Safety (Fire and First Aid)</b> Non compliance with legislation:- (i) Regulatory Reform (Fire Safety) Order 2005, as amended by the Fire Safety Act 2021, (ii) Health and Safety (First Aid) Regulations 1981	<p><b>Cause(s)</b></p> <ol style="list-style-type: none"> <li>No trained fire responsible person (legal) for the Civic Centre site</li> <li>Insufficient numbers of trained fire wardens working from the site to safely manage an evacuation (in accordance with the Fire Risk Assessments).</li> <li>Written Fire Safety Policy does not meet best practice</li> </ol> <p><b>Effect(s)</b></p> <ul style="list-style-type: none"> <li>Non compliance with the Regulatory Reform (Fire Safety) Order 2005, as amended by the Fire Safety Act 2021, meaning offices should not be occupied by staff until compliance is achieved</li> <li>Inadequate plans for fire safety and evacuation for current occupation plans putting staff and visitors at risk</li> <li>Non compliance with Health and Safety (First Aid) Regulations 1981 in terms of adequate first aid provision in the form of trained first aiders and appropriate equipment if employees are injured or become ill at work</li> </ul>	Legislative Reputational Legal Physical Personnel	4	4	16	<ul style="list-style-type: none"> <li>Reduced number of staff on site</li> <li>Public interactions moved to a virtual environment where possible</li> <li>Attendants to carry out fire warden duties in the event of an emergency</li> <li>Management review of site management activities and escalation to COE and Health and Safety Board (via Corporate Health and Safety)</li> <li>Attendants and Support Services teams act as fire marshals in event of an emergency</li> <li>Rota of first aiders managed by Corporate Health and Safety</li> </ul>	3	4	12	<ol style="list-style-type: none"> <li>Emergency Planning Manager drafting a new Fire Safety Policy to be reviewed by COE before 31st March 2022, which clearly sets out corporate accountabilities</li> <li>Corporate Health and Safety to arrange Fire Responsible Person, Fire Warden and First Aider training and to report progress to COE.</li> <li>COE to agree approach to resourcing fire warden and first aider cover under hybrid working arrangements - paper to be prepared by Corporate Health and Safety.</li> <li>Facilities Management to ensure Fire Risk Assessment reviews are completed for Civic Centre campus by April 2022.</li> <li>Facilities Management to engage fire safety supplier to produce an Emergency Plan for the Civic Centre site by end of April 2022 to include revised fire evacuation procedure which meets the best practice advice from the London Fire Brigade and HSE. Facilities Management team to implement new signage etc.</li> <li>Facilities Management team to distribute emergency plan to site occupiers and to arrange training on plan for fire marshals.</li> <li>Corporate Health and Safety to store fire safety documents (including Emergency Plans) on SharePoint site to retain corporate knowledge and ensure regularly reviewed.</li> <li>Fire Safety to be added to COE agenda as a standing item until above actions completed</li> </ol>	Director of Housing, Planning and Regeneration  Director of Human Resources, Customer Services and Public Affairs
15	Corporate Risk	<b>Homes for Ukraine</b> Inability to effectively manage the volume of people, including unaccompanied minors who may present as homeless due to cessation of sponsor accommodation, safeguarding concerns and the resulting additional pressures placed on the homeless budgets and children's social care	<p><b>Cause(s):</b></p> <ol style="list-style-type: none"> <li>Volume of refugees arriving increasing</li> <li>Breakdown in relationship between sponsor and guest</li> <li>Accommodation coming to an end at the pre-agreed period with no alternatives readily available, other than temporary accommodation or foster care</li> </ol> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>Failure to fulfil statutory obligations</li> <li>Impact on life chances and outcomes for individuals and families in temporary accommodation, particularly given the vulnerability of the refugees</li> <li>Increased risk of legal challenge due to provision of unsuitable accommodation (including shared accommodation)</li> <li>Pressure on Children's Social Care if the sponsor placement fails and a Foster Placement is required</li> </ul>	Housing Social	5	4	20	<ul style="list-style-type: none"> <li>Focus on preventing homelessness and diversion to alternative housing options through:-</li> <li>Landlord and Tenancy advice, support and sustainment</li> <li>Assistance, (including financial aid) to access the private rented sector</li> <li>Access to employment and training</li> <li>Debt, money, budgeting and welfare benefits advice, including assistance to resolve rent and mortgage arrears</li> <li>Sanctuary scheme for the protection of victims of domestic violence</li> <li>Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money</li> <li>Implementation of the More Homes Bromley initiative to ensure the supply reduces the reliance on nightly paid accommodation</li> <li>Implementing the Homelessness Strategy - setting up the multi agency Homelessness forum and taking forward the priorities of the strategy</li> <li>New incentive campaign for private sector landlords embedded and benefits being realised</li> <li>Modelling taking place to forecast how many households may need accommodation around the 6 month mark</li> <li>Expression of Interest data being utilised and home assessments and DBS checks will be carried out so that alternative sponsor accommodation is available</li> </ul>	4	4	16	<ul style="list-style-type: none"> <li>Approval to progress housing development schemes and reopening of the HRA, First 3 schemes now in development phases with options appraisals in place for further sites.</li> <li>Transformation Board action plan in place for next 3-4 years to increase available housing supply with an overall initial target of 1000 additional affordable homes.</li> <li>Continue to develop partnership working with private sector landlords to assist households to remain in private sector accommodation.</li> <li>Work innovatively with a range of providers to increase access to a supply of affordable accommodation.</li> <li>Continue to focus on early intervention and prevention of homelessness assessing trends in approaches to tackle main causes of homelessness.</li> <li>Beehive acquisition schemes has secured 90 new units of accommodation with Executive approval to enter into an acquisition programme with Orchard and Shipman for c250 homes.</li> </ul>	Director of Housing, Planning and Regeneration

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