

## Environment & Community Services (ECS) Risk Register - Appendix A6

											DATE LAST REVIEWED:	31/10/2018	
REF	DIVISION	RISK TITLE & DESCRIPTION	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING			FURTHER ACTION REQUIRED	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
1	All ECS	<b>Emergency Response</b> Failure to respond effectively to a major emergency / incident internally or externally	<b>Cause(s):</b> Emergency may be triggered by storms, floods, snow, extreme heat or other emergency. Ineffective response could be caused by capacity and/or organisational issues  <b>Effect(s):</b> - Failure to fulfil statutory duties in timely manner - Disruption to infrastructure and service provision in general	Service Delivery	2	4	8	1. Corporate Major Emergency Response Plan 2. E&CS Incident Plan (held by Emergency Planning) 3. Service Business Continuity Plans 4. Out-of-Hours Emergency Service 5. Winter Service Policy and Plan (reviewed annually) 6. Training, Testing and Exercising (includes training provided as part of a new Corporate Business Continuity Group formed in June 2018) 7. Multi-agency assessment of emergency risks	2	3	6	1. Continuation of the Corporate Business Continuity Group 2. Development of risk-specific arrangements in accordance with Minimum Standards for London and informed by the Borough Risk Assessment 3. Implement 'on-call rota' for Emergency Response Manager 4. Recruit and train more Emergency Response Volunteers	Nigel Davies
2	All ECS	<b>Central Depot Access</b> Major incident resulting in loss of / reduced Depot access affecting service provision (LBB's main vehicle depot)	<b>Cause(s):</b> Fire, explosion, train derailment, strike etc.  <b>Effect (s):</b> Significant service disruption (Waste, Street Cleaning, Gritting, Fleet Management, Streetscene & Greenspace service management etc.)	Service Delivery	2	3	6	1. Contingency plans for: - Alternative vehicle parking - Temporary relocation of staff - Storage of bulky materials 2. Implement Business Continuity Plans 3. Close liaison with other Depot users (e.g. Waste Contract, Street Cleansing) and Highways Winter Service Team 4. 'Central Depot Users Group' (Health & Safety forum for all site users) 5. Work Place Risk Assessments in place	1	3	3	1. Consideration of issue as part of the Environmental Services Contracts commencing in 2019.	Paul Chilton
3	All ECS	<b>Fuel Availability</b> Fuel shortage impacting on transport fleet and service delivery	<b>Cause(s):</b> National or local fuel shortage caused by picketing or other external factors  <b>Effect (s):</b> Failure to provide services impacting on residents and other customers	Service Delivery	1	3	3	1. Identified alternative fuel supplies at contractors and neighbouring boroughs (corporate Fuel Disruption Plans based on National Plan are held by the Emergency Planning Team) 2. Designated Filling Station identified under National Emergency Plan by London Resilience Team as designated fuel supply for LBB logoed vehicles 3. Fuel store at Central Depot 4. Ongoing liaison with other London Boroughs concerning collaboration and assistance	1	2	2	1. Continue to monitor service provider arrangements for ensuring adequate fuel supply.	Paul Chilton
4	All ECS	<b>Business Continuity Arrangements</b> Lack of up-to-date, tried and tested, BCP for all Council services	<b>Cause(s):</b> Failure to implement and keep up-to-date effective service and corporate Business Continuity Plans  <b>Effect (s):</b> Non-provision of critical services following an incident (internal or external)	Service Delivery	2	4	8	1. Corporate Risk Management Group now encompasses Business Continuity 2. New Corporate Business Continuity Group established in June 2018 with representation from ECS 3. Undertaking Business Impact Analyses of all services to identify priorities 4. Developing a Corporate Business Continuity Plan and updating service BCPs 5. Emergency Planning Training Exercise undertaken in March with involvement across all of ECS	2	3	6	1. Continue to conduct training exercises to ensure that BCPs for each service area work in real life	Nigel Davies
5	Public Protection	<b>Infectious Disease</b> Pandemic outbreak leading to staff shortages potentially coupled with increased service demand	<b>Cause(s):</b> Major pandemic (e.g. 'flu') outside of Bromley's control.  <b>Effect(s):</b> Disruption to normal services due to staff sickness and high demand on services from community	Health & Safety	1	5	5	1. Notifiable Infectious Disease Protocol in place (with Public Health England and DEFRA) including out-of-hours provision 2. Flu Pandemic Plan also in place (held by the Emergency Planning Team)	1	5	5	1. Regular multi-agency review of Protocols 2. Consider immunisation of key staff 3. Director will ensure BCP plans provide for service continuity in the event of a major outbreak affecting key staff	Joanne Stowell (Public Health team own this risk corporately)
6	All ECS	<b>Industrial Action</b> Contractors' staff work-to-rule / take strike action impacting on service delivery	<b>Cause(s):</b> Union dissatisfaction over pay and conditions (particularly in Waste)  <b>Effect (s):</b> Temporary disruption to service / reduced customer satisfaction	Service Delivery	2	3	6	1. Ongoing monitoring / meetings regarding workforce issues 2. Joint development of Business Contingency Plans with contractor	2	1	2	1. Review public communications to be used in the event of a strike	Nigel Davies
7	All ECS	<b>Line of Business Systems</b> Temporary loss of key systems such as CONFIRM / UNIFORM etc. due to IT failure	<b>Cause(s):</b> Network, software, hardware failure  <b>Effect (s):</b> Impact on contractor liaison and service delivery	Service Delivery	3	3	9	1. Paper-based system implemented when network problems occur 2. Ongoing discussion with Corporate IT to reduce likelihood of IT failure	3	3	9	1. Review and refresh ICT Quality Assurance Procedures accounting for more mobile working 2. Ensure issue addressed in future contracting arrangements	Dan Jones
8	All ECS	<b>Health &amp; Safety (E&amp;CS)</b> Ineffective management, processes and systems within E&CS departmentally	<b>Cause(s):</b> Failure to take departmental action to reduce likelihood of accidents, incidents and other H&S issues  <b>Effect (s):</b> HSE investigation / prosecution leading to fines, increased insurance claims, and reputational damage	Health & Safety	2	4	8	1. Workplace Risk Assessments (including lone and home working) 2. Accident & Incident Reporting system (AR3 & Riddor) 3. Contractor Inspection Reporting system (which has been updated to an electronic reporting system in July 2018) 4. Interface with Corporate Risk Management Group 5. Annual audits and annual paths surveys (Parks) 6. Cyclical 5-year survey of park trees and highway trees 7. Regular Footway inspections 8. ECS Health and Safety Committee meets regularly to review departmental Health and Safety arrangements	2	3	6	1. Ensure Workplace Risk Assessments (inc. Homeworking) updated annually and biennial reviews conducted 2. Encourage reporting of all significant accidents and incidents using AR3 form (and reporting of RIDDOR incidents) 3. Ensure resource exists to discharge statutory functions	Nigel Davies

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9	All ECS	<b>Health &amp; Safety (Council)</b> Ineffective management, processes and systems across all Council departments	<b>Cause(s):</b> Capacity to discharge the Council's H&S responsibilities  <b>Effect (s):</b> Potential prosecution of Council and / or civil claims for compensation	Health & Safety	2	4	8	1. 0.6 fte Corporate Safety Advisor employed 2. Safety Policy reviewed and updated regularly 3. Commitment to HSW from Chief Executive and Directors 4. Risk assessment & proactive monitoring in place to ensure highest standards for Council premises, equipment & activities 5. Supported by H&S training programme and network of policies and procedures (regularly reviewed) 6. Departmental Safety Committees meet regularly 7. Property-related HSW matters now provided through Amey	1	3	3		Nigel Davies	
10	Streetscene and Greenspace	<b>Environmental Services Contract (General)</b> Failure to procure tendered services to schedule and to budget	<b>Cause(s):</b> - Tender programme not keeping to schedule - Lotting structure and/or timetable unattractive to tenderers - Unfamiliarity with new contract model (client & contractors) - Lack of client capacity to process contract documentation - Significant service change requiring service-user consultation - Tendered costs being higher than budget / forecast  <b>Effect(s):</b> - Procurement timetable slippage - Reduced negotiation time - Risk of challenge - Reputational damage - Failure to achieve best value - Lack of competition / bids - Failure to deliver service to requirements / KPIs / expectations	Service Delivery	3	4	12	1. Procurement Strategy Report (ES17002): 21/04/17 2. PIN issued 17/11/17 3. OJEU notice issued 08/01/18 4. Programme Plan regularly updated by Programme Management Team 5. Regular progress reports to Environmental Services Commissioning Board (includes Service Owner, Project Sponsor and Programmer Manager) 6. Price / growth pressure to be flagged in four-year forecast and actual costs to be included in 2019/20 budget 7. Programme Resourcing: Funding identified and Waste Expert appointed to support through negotiation process.	2	3	6	Risk mitigated by phasing activity: 1. Stage 2 (ISIT & Evaluation) commenced (March to June 2018) 2. Stage 3: Feedback & Negotiation (July-Sept. 2018) 3. Stage 4: Final Tender & Authorisation (October 2018) 4. Stage 5 (Award) Contract Award & Transition/Mobilisation (November 2018) 5. Contract Start date: 01/04/19  All planned activities are on track.	Dan Jones	
11	Streetscene and Greenspace	<b>Environmental Services Contract (Mobilisation)</b> Failure to effectively mobilise the new Environmental Services Contracts	<b>Cause(s):</b> - Unfamiliarity with new contract model (client & contractors) - Lack of client capacity to progress mobilisation - Lack of supplier capacity to progress mobilisation - Significant service change requiring service-user consultation - Lack of preparation of contract transition (exit and mobilisation) plans  <b>Effect(s):</b> - Reputational damage - Costs incurred as a result of additional last minute resources required to deliver services - Failure to deliver service to requirements / KPIs / expectations	Service Delivery, Financial & Reputational	3	4	12	1. Regular Project Planning meetings are held to discuss contract transition 2. Project Initiation Document signed off on 30.10.18 3. Transition Plans are being developed (including exit and mobilisation plans for each contract)	2	4	8	1. Continued review of contract transition plans as part of client project meetings 2. Regular discussions of exit plans with supply chain (and commissioning support) through monthly contract meetings (additional meetings to be held as contract end date approaches)	Dan Jones	
12	Highways	<b>Highways Management</b> Deterioration of the Highway Network due to under-investment	<b>Cause(s):</b> Failure to manage Highways in respect of traffic volumes, winter weather, financial resources leading to deteriorating condition  <b>Effect (s):</b> Leading to increased maintenance costs, insurance claims (trips, falls and RTAs) and reputational damage	Financial	2	4	8	1. Strategy to mitigate insurance claims 2. Inspection regime and defined intervention levels for maintenance repairs and monitoring 10% of works for compliance 3. Winter Maintenance procedures (gritting / salting) 4. Increased salt storage capacity 5. Improved customer expectation management 6. Asset management technique (e.g. Highway Asset Management Plan) 7. New capital programme to reduce reactive works 8. Performance Management measures incorporated into new Highways contract from July 2018	3	2	6	1. Review frequency of Highways Inspections and adjust as deemed appropriate to effectively manage the risk in line with revised Code of Practice (published 2016) 2. Additional inspections carried out and repairs undertaken as necessary 3. Modernisation of contractor's programming and completion of maintenance repairs involving remote working ICT technology	Garry Warner	
13	Streetscene and Greenspace	<b>Arboricultural Management</b> Failure to inspect and maintain Bromley's tree stock leading to insurance claims etc.	<b>Cause(s):</b> Failure to ensure that trees are managed as safely as reasonably practicable  <b>Effect (s):</b> Leading to blocked highways, reputational damage and financial liabilities	Financial	4	3	12	1. Tree care and safety contract (commenced July 2008) with Gristwood & Toms Tree Contractors Ltd 2. Full asset Survey of ~30% of street and park trees (and 50% of school trees) 3. Risk trees identified and registered increased inspection frequency using asset management database (Confirm) 4. Implement remedial works to address risk associated defects	1	4	4	1. Review the 'Storm Strategy' annually (last reviewed Feb 2018) to be able to respond quickly and call in additional staff, equipment and contractors 2. Provide a cyclical safety survey and remedial works schedule commensurate to budget availability and potential prioritisation 3. Review Tree Risk Management Strategy (annually)	John Bosley	

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14	All ECS	<b>Income Variation</b> Loss of income when the Council is looking to grow income to off-set reduced funding	<b>Cause(s):</b> - Improved Street Works performance by utility companies (reduced fines) - Under-achievement of expected car parking income and parking enforcement, due to resistance to price increases and reduced incidents - Loss of income from Penalty Charge Notices for Bus Lane Enforcement activity - Reduction in Street Enforcement activity (Fixed Penalty Notices) - Failure of APCOA (new Parking contractor) to provide contracted services (e.g. strikes) - Removal of Council exemption for charging VAT on commercial waste impacting on pricing and therefore income  <b>Effect (s):</b> Loss of income with potential to reduce service delivery funds	Financial	3	2	6	1. Regular income monitoring 2. Monitoring contractor performance (e.g. only issue good quality PCNs) 3. Good debt recovery systems 4. Monitoring parking use and avoid excessive charge increases 5. Provide attractive, safe clean car parks 6. Reviewed fees and charges to optimise Trade Waste income 7. Regular contractor meetings 8. Monitoring of parking enforcement activity through new Performance Indicators reported to PDS Committees (E&CS, PP&E)	3	2	6	1. Refine procedure for resolving disputes with utilities 2. Review parking tariff structures annually 3. Monitor income trends 4. Continue to monitor success in achieving enforcement objectives 5. Benchmark Parking charges against other authorities and local private sector competitors 6. Intelligence-led targeting of hotspot sites for enforcement	Nigel Davies
15	Streetscene and Greenspace	<b>Waste Budget</b> Increasing waste tonnages resulting in increased waste management costs	<b>Cause(s):</b> - Failure to anticipate/manage waste management financial / cost pressures due to increasing landfill tax, increasing property numbers, declining recycling income (lower paper tonnages) and limited incineration capacity - Failure to achieve contract payment mechanism targets for the proportion of waste sent to landfill / incineration / recycling / composting - Waste tonnage growing faster than budgeted or operational factors (i.e. adverse weather conditions, etc.)  <b>Effect (s):</b> - Budgets being exceeded and potential knock-on impact on other Council services	Financial	3	4	12	1. Cost pressures recognised in Council's Financial Strategy 2. Landfill tonnages falling - offsets any tax increase 3. Continued focus on promoting waste minimisation and recycling (e.g. in Environment Matters and through targeted campaigns such as Food Waste doorstep) - Monthly monitoring of recycled tonnages and projection to yearly figures - Regular and sustained recycling awareness campaign - Consolidation of Compositing for All campaign - Continuing investigation of waste minimisation and recycling initiatives - Monthly monitoring of all waste tonnages and projection to yearly figures - Monthly monitoring of all collection costs and figures - Ongoing analysis of collection and disposal methodology	2	3	6	1. Consideration of alternative disposal routes e.g. increased use of Veolia's Mechanical Biological Treatment (MBT) plant 2. Reviewing and benchmarking operational costs to identify options 3. Achieving best value tenders under new contract - contract award November 2018	Dan Jones
16	S&G	<b>Environmental Services Contract (Waste)</b> Waste growth and proposed management solutions / technologies fail to control waste costs	<b>Cause(s):</b> - Failure to secure sufficient Waste Disposal facility capacity to handle / process future needs - Over-reliance of waste tenders on unproved technology or unbuilt plant - Changing government requirements regarding collection frequencies / segregation / containers - Tenders found to be more expensive than existing service  <b>Effect (s):</b> - Higher service costs (and pressure on other aspects of the Contract)	Financial	3	4	12	1. Programme Board aware of issues e.g. need to scrutinise unproven / unbuilt proposals 2. LBB to provide input to Defra Waste Collection Harmonisation Steering Group and will provide early feedback to the Board on any possible changes 3. Process & frequency plan for each service 4. Programme Board: aware of need to secure sufficient guaranteed but flexible capacity. Responsibility to secure assured capacity has been clearly placed on contractor in contract specification and assessed during the tender process.	2	2	4	1. Management solutions to control waste costs have been confirmed at contract negotiation stage and will be monitored throughout the delivery of the waste contract from April 2019	Dan Jones
17	Public Protection	<b>Food Standards Agency Audit</b> Failure to meet required service standards as required by Food Standards Agency Audit (April 2017)	<b>Cause(s):</b> Lack of resource to meet Code of Practice service standards  <b>Effect(s):</b> Leading to reputational damage and possible use of Power of Direction	Health & Safety	4	3	12	Following a recent meeting with the FSA (September 2018), they accepted the issues the Team has in recruiting Officers with the prerequisite qualifications necessary to carry out the spectrum of work. In response, they advised the Team to:  1. Focus on completing due A -D inspections 2. Focus on completing overdue C-D inspections 3. This authorisation to shift focus has necessitated a new work programme designed to achieve the desired outcome which has now been developed by the Lead Practitioner.	3	3	9	1. The new work programme has been implemented, and focus was given to completing due A -D inspections and overdue C-D inspections. 2. There are still issues with recruitment, as a FTE officer has resigned, and an agency officer left with no notice. Still a need to recruit to 1.4 X FTE food safety officers to address the vacancies. Met with the FSA again on 26th October 18, and they confirmed they were pleased with progress, as the new focus has reduced the overdue inspections considerably. They are following up in 3 months, and anticipate signing off the audit in 6 months if progress is maintained. It should be noted that at the October monthly performance review for this service, all Performance Indicators were reported as Green (on track).	Joanne Stowell

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18	All ECS	<b>Town Centre Businesses</b> Loss of town centre businesses to competition	<b>Cause(s):</b> Failure to redevelop high streets coupled with competition from out-of-town developments and online shopping  <b>Effect(s):</b> Reduction in high street business and market stall occupancy Loss of income (Business rates and market stalls) Poor public perception and negative publicity	Financial	3	4	12	1. BID Teams organise town centres events 2. Investment in Orpington High Street and Bromley North (done) 3. Regular advertising / promotion of markets and availability of stalls 4. Review of Market operational costs to reduce costs where possible (a Commissioning exercise is underway as at October 2018 for the markets service) 5. Regular maintenance and renewal of market infrastructure - recent market relocation project has been undertaken.	2	3	6	1. Ongoing review of market provision linked to outsourcing service provision to Bromley Business Improvement District 2. Detailed annual action plan to be drawn up for each town centre	Jim Kehoe Colin Brand Dan Jones
19	Traffic and Parking	<b>New Parking Schemes</b> Failure to deliver new Parking schemes resulting income loss and congestion	<b>Cause(s):</b> Increasing demand from residents for parking schemes coupled with decreasing grant funding from TfL  <b>Effect (s):</b> Increased congestion and reduced income	Service Delivery	3	4	12	1. Set up register of agreed schemes with designated officers and timescales 2. Develop and agree financial appraisal framework with finance department 3. Software procured (2013/14) to help improve project and programme management	2	2	4	1. Consideration to be given to better balancing the cost of scheme design against parking charges	Angus Culverwell
20	All ECS	<b>Staff Recruitment and Retention</b> Loss of corporate memory and ability to deliver as key staff leave (good new staff are at a premium)	<b>Cause(s):</b> Availability of suitably qualified / experienced staff to replace retirees and leavers. Particular problem within Planning, Environmental Health and Traffic professionals (TfL offers better remuneration and career progression).  <b>Effect (s):</b> Loss of organisational memory, greater reliance on contracted staff, delays in delivering services / plans (e.g. Transport Local Implementation Plan)	Service Delivery	3	3	9	1. Ongoing programme to find and retain quality staff through internal schemes such as career grades and ongoing CPD	2	2	4	1. Consider potential for contractors to supply necessary skills	Nigel Davies
21	Streetscene and Greenspace	<b>Burial Space</b> Insufficient Council-operated burial space for long-term demand	<b>Cause(s):</b> Potential lack of acceptable local space for burials (ashes interment not a problem)  <b>Effect (s):</b> Leading to reputational damage	Reputational	3	3	9	1. Burial plots are available at St Mary Cray and Biggin Hill (with some limited capacity in other sites for partners of deceased) 2. New cemetery provided by the private sector at Kennal Manor Chislehurst, which will alleviate pressures on Council-owned burial space 3. Excess Death Plan is in place and held by Emergency Planning (with regard to burial capacity in the Coronial Area) 4. Mortuary contract procurement is in progress	2	2	4	1. Monitor availability of private sector capacity 2. Consider what further burial alternatives are being provided by the private sector i.e. new cemetery at Kennal Manor, Chislehurst	John Bosley
22	All ECS	<b>Climate Change</b> Failure to adapt the borough and Council services to our changing climate	<b>Cause(s):</b> Severe weather events including extreme heat, storms, floods etc.  <b>Effect (s):</b> Resulting in threats to service provision, environmental quality and residents' health	Service Delivery	3	3	9	1. Adopt best adaptation practice as identified through London Climate Change Partnership, UK Climate Impacts Programme, and the Local Adaptation Advisory Panel 2. LBB Surface Water Management Plan and Draft Local Flood Risk Strategy	2	3	6	1. Emergency Planning to liaise with Public Health on cross-cutting issues e.g. excess summer deaths and vector-borne disease etc.	Nigel Davies
23	Public Protection	<b>Mortuary Contract</b> Failure to procure tendered services to budget	<b>Cause(s):</b> - Lack of interest from potential bidders - Tendered costs being higher than budget / forecast  <b>Effect(s):</b> - Risk of challenge - Reputational damage - Failure to achieve best value - Lack of competition / bids - Failure to deliver service to requirements / KPIs / expectations	Financial & Service Delivery	4	4	16	1. Existing contract extended whilst negotiations are underway	3	4	12	1. Partnership agreement: Commissioning Board (11.10.18) confirmed that a partnership arrangement (whereby LB Bromley provide the capital investment for the upgrade of body storage facilities ) would be the preferred option (subject to Member approval). This new business model would provide value for money for both the Trust and the Council, and the benefits would far outweigh those of keeping to the 'business as usual' model, as The PRUH mortuary facilities require an upgrade in any event, and this option fits in with the strategic case for future proofing the facilities. This proposal has been presented to the Trust by the Mortuary Manager (12.10.18), with an agreement in principle, however, nothing has been provided in writing. JS is in regular contact with the Mortuary Manager to try and progress. In the interim period, she has been given an informal undertaking that service will continue to be provided at the current rate whilst negotiations continue.	Joanne Stowell

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