



Public Protection and Enforcement (PP&E) Risk Register

No.	E&PP RISK REF	DIVISION	RISK TITLE & DESCRIPTION	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING			DATE LAST REVIEWED:	31/10/2022
						LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING	FURTHER ACTION REQUIRED	RISK OWNER
1	1	All E&PP	Emergency Response Failure to respond effectively to a major emergency / incident internally or externally	Cause(s): -Emergency may be triggered by storms, floods, snow, extreme heat or other emergency. Ineffective response could be caused by capacity and/or organisational issues Effect(s): - 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. Adoption of Standardisation Process in terms of Emergency Response 3. Business Continuity Policy & Strategy and associated Service Business Continuity Plans 4. Out-of-Hours Emergency Service 5. Winter Service Policy and Plan (reviewed annually) 6. Ongoing training, Testing and Exercising programme 7. Multi-agency assessment of emergency risks 8. Training Programme delivered for volunteers in respect of Standardisation Process 9. Implementation of 'on-call rota' for Emergency Response Manager and at Director level 10. Multi-agency forum for emergency preparedness, response and recovery planning within the Borough	2	3	6	1. Delivery of the Business Continuity Management process by CLT 2. Development of risk-specific arrangements based upon London Resilience frameworks, informed by the Borough Community Risk Assessment 3. Recruit and train more Emergency Response Volunteers 4. Implementation of the Resilience Standards For London	David Tait
2	2	All E&PP	Central Depot Access Major incident resulting in loss of / reduced Depot access affecting service provision (LBB's main vehicle depot)	Cause(s): -Fire, explosion, train derailment, strike etc. Effect (s): -Significant service disruption (Waste, Street Cleaning, Gritting, Fleet Management, Neighbourhood Management etc.)	Service Delivery	4	3	12	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/co-operative forum for all site users) 5. Work Place Risk Assessments in place 6. Depot Insurance reviewed September 2020 to ensure full reinstatement cover is in place 8. Waste Service Change has incorporated separate battery collection which will reduce likelihood of fires from batteries in residual waste	3	3	9	1. Site re-development plans to include recommendations from fire safety audit. To include consideration of fire suppression systems	Paul Chilton
3	3	All E&PP	Fuel Availability Fuel costs and shortage impacting on LBB and service provider fleets, and LBB staff transport	Cause(s): -National or local fuel shortage caused by picketing or other external factors Effect (s): -Failure to provide services impacting on residents and other customers - LBB staff unable to commute or use their own vehicles for business journeys	Service Delivery	1	5	5	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 logged vehicles 3. Fuel store at Central Depot 4. Ongoing liaison with other London Boroughs concerning collaboration and assistance	1	4	4	1. Ensure service providers Business Continuity Plans include security of fuel supplies. 2. Ensure LBB pool cars are available for LBB staff use 3. Adoption of EV pool fleet	Peter McCready
4	4	All E&PP	Business Continuity Arrangements Lack of up-to-date, tried and tested, BCP for all Council services	Cause(s): -Failure to implement and keep up-to-date effective service and corporate Business Continuity Plans Effect(s): -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. Full suite of BC plans in place across all Directorates, including E&PP 3. Overarching corporate BC plan developed identifying prioritisation of all services 4. All E&PP BC plans now transposed on to new corporate BCP template 5. Corporate BC management policy & strategy document signed off by leader and chief exec 6. Ensure all service providers have up to date Business Continuity Plans	2	3	6	1. CLT adoption of BCM which will monitor delivery on behalf of COE going forwards. COVID-19 disruption to ways of working tested BCPs during the largest disruption encountered in decades. ICT system failure has been identified as the largest risk and is outside the control of E&PP	David Tait
5	6	All E&PP	Industrial Action Contractors or staff work-to-rule / take strike action impacting on service delivery	Cause(s): -Union dissatisfaction over pay and conditions (particularly in Waste) Effect (s): -Temporary disruption to service / reduced customer satisfaction	Service Delivery	3	4	12	1. Ongoing monitoring / meetings regarding workforce issues 2. Joint development of Business Contingency Plans with Service Providers 3. Staff training and engagement built into the Environmental Services contracts	2	4	8	1. Review public communications to be used in the event of a strike 2. Staff training and engagement incorporated into communications with staff	Colin Brand
6	14	All E&PP	Income Variation (Highways and Parking) Loss of income when the Council is looking to grow income to offset reduced funding *Note new COVID-19 specific parking risk addition at the end of this register	Cause(s): - 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 - Lower than predicted income from Penalty Charge Notices for Moving Traffic Contravention cameras due to changes in traffic volume and patterns - Reduction in Street Enforcement activity (Fixed Penalty Notices) - Failure of APCOA (new Parking contractor) to provide contracted services (e.g. strikes) - Reduction in TfL LIP funding for traffic and road safety schemes Effect (s): -Loss of income with potential to reduce service delivery funds	Financial	3	3	9	1. Regular income monitoring and review of parking tariff structures, including benchmarking Parking charges against other authorities and local private sector competitors 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, plus consider changing pricing models 5. Provide attractive, safe clean car parks 6. Regular contractor meetings 7. Monitoring of parking enforcement activity through Performance Indicators reported to PDS Committees (E&CS, PP&E) 8. Scrutiny of APCOA at PDS meetings	3	2	6	1. Refine procedure for resolving disputes with utilities 2. Review of parking tariff structures 3. Monitor income trends 4. Continue to monitor success in achieving enforcement objectives 5. Intelligence-led targeting of hotspot sites for enforcement 6. Review of further income opportunities as part of Council's Transformation agenda 7. Accelerate removal of P&D machines in favour of cashless payment 8. Consider relocation of MTC cameras 9. Council to consider reprofiling highway improvements and behaviour change projects if funding is reduced to implement Local Implementation Plan (LIP).	Angus Culverwell
7	18	All E&PP	Town Centre Businesses and Markets & reducing living standards due to numerous economic impacts on households Loss of town centre businesses to competition and as a result of the COVID-19 pandemic	Cause(s): -COVID-19 Pandemic causing businesses and market traders to cease trading (temporarily or permanently) - Town centre social distancing measures resulting in a reduced amount of market stalls Effect(s): -Reduction in high street business and market stall occupancy -Loss of income (Business rates and market stalls) -Poor public perception and negative publicity	Financial	5	3	15	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 new Market Strategy is under development and will be delivered from 2020/21) 5. Regular maintenance and renewal of market infrastructure - recent market relocation project has been completed and feedback from traders is positive 6. Markets Manager attends regular strategy meetings with BIDs and has provided guidance for a new town centre (BID) framework agreement	2	3	6	1. Ongoing review of market provision linked to outsourcing service provision 2. Detailed annual action plan to be drawn up for each town centre	Peter McCready

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8	20	All E&PP	Staff Resourcing and Capability Loss of corporate memory and ability to deliver as key staff leave (good new staff are at a premium)	<p>Cause(s): -Lack of availability of suitably qualified / experienced staff to replace retirees and leavers. Particular problem within Planning, Environmental Health, Trading Standards and Traffic professions. There are insufficient Planning, EH & TS staff in the market due to efficiencies in staff training across local government over many years and the professions are now 'aging out' also TIL has previously offered better remuneration and career progression locally. Lack of incentive for good staff to remain at LBB. Combining of roles in lean services which do not appeal to professionals who want to do well at their chosen work area e.g. combining roles such as EH statutory nuisance with ASB/community safety work within teams and specific roles.</p> <p>Effect (s): -Loss of organisational memory, need for good quality staff in lean services, greater reliance on expensive contracted staff, delays in delivering services and work plans (e.g. Transport Local Implementation Plan) and lower quality services. Inability to effectively manage contracts as Contract Managers may have started out in a different role (i.e. as Service Managers) and therefore may not have the necessary expertise (i.e. contract monitoring, project management and auditing).</p>	Service Delivery	3	4	12	1. Ongoing programme to find and retain quality staff through internal schemes such as career grades and training and ongoing CPD. Consider development of trainee posts.	3	3	9	1. Consider potential for contractors to supply necessary skills 2. Review options with HR for incentivisation schemes to ensure staff recruitment and retention is high 3. Existing controls are not currently sufficient to maintain the staff quota within the Arboriculture team. 4. Positively explore apprenticeship and intern schemes as a possibility to ensure teams can maintain deliverables of the service in terms of client inspections and reporting. 5. Enlist contractor to assist with tree survey backlog. 6. Develop staff in at risk services and teams (grow our own)	Colin Brand
9	22	All E&PP	Climate Change Failure to adapt the borough and Council services to our changing climate	<p>Cause(s): -Severe weather events including extreme heat, storms, floods etc.</p> <p>Effect (s): -Resulting in threats to service provision, environmental quality and residents' health in addition to reputational damage caused by perceived lack of action to tackle climate change</p>	Service Delivery	3	4	12	1. Adopt best adaptation practice as identified through London Climate Change Partnership, UK Climate Impacts Programme, and the Local Adaptation Advisory Panel 2. Implementation of LBB's Carbon Management Programme 3. LBB Surface Water Management Plan and Draft Local Flood Risk Strategy 4. Establish net zero (direct) carbon emissions target for 2027 as part of 10 year climate plan 5. Climate Change included within Corporate Risk Register and risks associated with climate change e.g. increased number of extreme weather events, included within Contract Risk Registers.	2	4	8	1. Emergency Planning to liaise with Public Health on cross-cutting issues e.g. excess summer deaths and vector-borne disease etc. 2. Detailed climate action plan developed as part of ongoing Carbon Management Programme, in order to achieve net zero organisational carbon emissions by 2027. 3. Public signposting document to be developed early in 2021 to support homeowners and businesses to reduce their emissions.	Colin Brand
9	28	Public Protection	Dogs and Pests Contract Failure to deliver the contract to the required service levels	<p>Cause(s): -Lack of robustness within contract specification in terms of contract deliverables and Key Performance measures</p> <p>Effect (s): -Inability to deliver statutory functions -Reputational damage</p>	Service Delivery	3	2	6	1. Identification of named Contract Manager 2. Regular contract management meetings with service provider 3. Review of contract specification to identify change control requirements (a contract change notice regarding a change to invoicing was signed in August 19).	2	2	4	1. The current contract ends in January 2023 2. PDS decision on 16th June 2022 to retender the stray dogs and rehoming service only and decommission the pest control element of the contract 3. Tender process has started and the contract award is expected by end of October 2022	Sarah Newman
11	29	Public Protection	Out of Hours Noise Service Failure to deliver service	<p>Cause(s): The out of hours (OOH) noise service is dependent on grant funding from the Mayor's Office for Policing & Crime (MOPAC) by way of the Local Crime Prevention Fund (LCPF). This grant is released on a 2 year cycle funding is currently in place until 31 March 25. The grant is being maintained by MOPAC at the same level as previous years, thus is seeing a year on year reduction in its real value due to inflation. As the service is supported by external funding, there is no future guarantee it will sustain. The OOH noise service is staffed on a voluntary basis, and despite the remuneration being increased in Sept 21, the appetite of officers to furnish the rota has not improved. This is resulting in occasions when the rota is not staffed. A paper on the effectiveness of recent changes and costed future options for the service has been prepared and was to be presented at PPE & PDS in September 22 but due to cancellation of the Committee will be presented at an alternative date.</p> <p>Effect: Occasional inability to deliver Out of Hours Noise Service.</p>	Service Delivery	4	4	16	1. Annual review with MOPAC on service outcomes - Done 2. Exploring the cost of a centrally funded OOH service. Delivery models discussed with Portfolio Holder/s & member preferences advised - Done 3. Amend website to manage customer expectation - In process 4. Consider making the OOH rota mandatory in new EH enforcement work contracts, HR expressed concerns regarding this option. Currently developing potential staff pay models to discuss further with HR	4	4	16	1. Press MOPAC to confirm funding status - Bids for further funding submitted & successful 2. Produce report on centrally funding OOH service - Options paper has been prepared and consulted with HR & Portfolio Holder. Report to go to PPE & PDS following cancellation of September 22 Committee. 3. Continue to encourage officers to participate in rota - despite repeated entreaties to staff, interest in participating on the OOH rota remains low.	Colin Brand/Louise Watkinson
12	30	Public Protection	Integrated Offender Management Failure to contribute to IOM in Bromley	<p>Causes: IOM functions are reliant on grant funding from MOPAC. Their contribution equates to one officer day a week for IOM work. Potential for short notice reduction or cessation of the grant.</p> <p>Effect: Inability to contribute to IOM in Bromley.</p>	Service Delivery	3	4	12	1. Annual review with MOPAC on service outcomes	3	4	12	1. Meetings with MOPAC to ensure early warnings of any change to funding levels. MOPAC funding is outside of the control of LBB. Current grant ends in March 2025 with bids for extension due in Autumn 2024.	Sarah Newman
13	31	Public Protection	Community Impact Day Co-ordinator post: Failure to deliver ASB problem solving and partnership activity	<p>Cause(s): -This post receives funding from a MOPAC grant for 1 year at a time, thus is vulnerable. This post is responsible for delivering targeted community improvement project work to reduce crime and ASB in 4 priority wards with partner agencies. Potential for short notice reduction or cessation of the grant.</p> <p>Effect: -Inability to fund this post would result in the disruption/cessation of targeted Community Impact Day work with partners. MOPAC funding for this post is reducing in real terms year on year. The shortfall in funding for a full time officer is currently being met by the Public Protection salaries budget.</p>	Service Delivery	3	4	12	1. Annual review with MOPAC on CID project outcomes. The review of project outcomes to determine if the days could be delivered on a reduced budget resulted in the answer - no they cannot. CIDs would have to be reduced in scope and outcomes or cease.	3	4	12	1. Review of Community Safety functions to allow for MOPAC project delivery on reduced days per week. MOPAC funding is outside of the control of LBB. Current grant ends in March 2025 with bids for extension due in Autumn 2024.	Sarah Newman
14	32	Public Protection	Gangs & Serious Youth Violence Officer Failure to deliver gang problem solving and partnership activity	<p>Cause(s): -This post has funding from MOPAC for 1 year at a time, thus is vulnerable. The post is responsible for the strategic coordination of gang intervention and reduction in serious youth violence. Potential for short notice reduction or cessation of the grant.</p> <p>Effect: -Inability to fund this post would result in the cessation of strategic coordinated gang disruption work with partners. The salary shortfall of this post is currently met by Public Protection salaries budget.</p>	Service Delivery	3	4	12	1. Annual review with MOPAC on service outcomes	3	4	12	1. MOPAC funding is outside of the control of LBB. The grant bid for 2022/23 has been successful. Current grant ends in March 2025 with bids for extension due in Autumn 2024.	Sarah Newman

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15	33	Public Protection	The provision of 24/7 CCTV Monitoring	Cause: -On-going COVID 19 Pandemic Effect: -Loss of officers through sickness arising from a potential future waves leading to an inability to provide 24-7 CCTV monitoring .	Service Delivery	3	4	12	The CCTV Control Room is back to full strength - 1 x supervisor and 2 x operators on shift patterns. All staff have now been offered a vaccination and the social distancing/face masks requirement is still in force and will continue until such a time the Government relaxes restrictions further.	1	3	3	1. Monitor and review monthly with Contractors	Rob Vale
16	34	Public Protection	Loss of Income from Licensed Premises	Cause: -COVID-19 pandemic and its impact on achieving income from premises licensing. Effect: -The majority of income relates to alcohol and gambling licences which are renewed between October and November each year. The team has already received the income for the first 7 months of this financial year and have not had any requests to refund existing licences. However, there is a risk that the expected income target will not be met for some time in future due to businesses not surviving the financial impacts of the pandemic and wider economic trends such as inflation and its impact on hospitality.	Financial	3	4	12	1. The Council's Covid-29 business support schemes offered business rate deferral as well as discretionary grants to cover non staffing overheads, the government have not specifically provided assistance with the costs of licences and premiums and there was an assumption that the loss of use of the licence would be covered under the discretionary grants. For most businesses the licence is a minor cost and they are more concerned with significant overheads such as energy, staffing, materials costs, rents, and rates. Expected income targets are not being met, the Division has used C-19 COMF funding to maintain a balanced budget thus far, but may have to look to mitigate the shortfall by reducing expenditure to maintain a balanced budget. 2. Licensing income for 2022/23 will remain reduced as a result of business closures. An accurate forecast is not available in the current economic climate.	3	3	9	1. Monitor and review income quarterly	Sarah Newman
17	35	All E&PP	Risk to Health - Ill health resulting from enforcing Health Protection Coronavirus Restrictions Regulations 2020 or from operating public sites	Cause: -COVID-19 pandemic and the national requirements that Environmental Health and Trading Standards Officers enforce the COVID-19 Regulations. - Operational activities requiring staff to undertake site visits or to operate public facilities. Effect: -The potential for officers, contractors and visitors to be exposed to and infected by, COVID-19	Service Delivery	3	4	12	1. Risk assessments have been undertaken. No face to face inspections to take place, all investigations to be undertaken at arm's length via email or telephone, drive by, etc. unless there is a life and limb enforcement issue. Should face to face contact be necessary, PPE (gloves/masks/sanitiser) are provided to staff and must be used in accordance with C-19 risk assessments. 2. Assessments for bulky waste collections undertaken via telephone. 3. Currently no enforceable C-19 controls, just government advice.	3	3	9	To ensure risk assessments for all service areas are regularly reviewed	Colin Brand
18	37	Public Protection	Increased Costs for Coroners Service	Cause: -Coroner increasing staffing costs - potential request for a second court - high profile inquests, changes to assistant coroners longer term practices - additional high risk post mortems due to Covid-19 Effect: -Additional estimated costs (£238k staffing £57K post mortems) over current BAU contract costs	Financial	4	5	20	1. Ongoing communication with the South London Coroners Consortium to ensure that additional costs are scrutinised, and not agreed to without prior consultation and agreement	4	5	20	1. If the PM costs cannot be absorbed by the consortium, the Public Protection Division would look to mitigate any additional spend by reducing expenditure within the division/department to maintain a balanced budget. 2. With regard to the potential additional spend on staffing etc - The Director of Environment & Public Protection has challenged the appropriateness of the required spend. Until such time that the requested necessary evidence is presented to support the cost increases, Bromley payments will be made in accordance with, and within, the constraints of the contract budget. Separate payments will be made to cover additional costs (e.g. inquests) as and when they are incurred.	Colin Brand/Louise Watkinson
19	39	Public Protection	Dysfunctionality of Uniform Information Management System	Cause: This is a legacy system and there has been a lack of investment in maintaining it. Effects: - The dysfunctionality of Uniform affects how data is recorded, retrieved and analysed. Data is not always saved or retrievable. Further there are issues trying to connect to the system remotely.	Service Delivery	5	4	20	1. Software updates in May 21 improved the performance of the Uniform system. The division is currently in the process of upgrading the software to Idox Cloud which is expected to be implemented in April/May 2023.	3	4	12	1. Idox Cloud will mitigate the reliance on the Civic Centre servers as the new system is Cloud based. The project commenced in late September and is currently on course to be fully implemented in April/May 2023	Rob Vale
20	42	Public Protection	Health & Safety (PP&E) Ineffective management, processes and systems within department	Cause(s): -Failure to take departmental action to reduce likelihood of accidents, incidents and other H&S issues Effect (s): -Increased injuries to staff, potential HSE investigation / prosecution leading to fines, increased insurance claims, and reputational damage	Health & Safety	3	4	12	1. Workplace Risk Assessments (including lone and home working) in place and regularly reviewed 2. Accident & incident reporting system (AR3 & Riddor) fully utilised by staff and managers 3. Contractor inspection electronic H&S reporting systems in place 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. Fire responsible persons list in place for all sites under the control of E&PP 9. EPP Health and Safety Committee meets regularly to review departmental Health and Safety arrangements 10. All corporate policies followed for COVID-19 risk assessments. Staff home working unless unable to do so. 11. Transfer all flagged premises to corporate system from Uniform	2	4	8	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 the necessary communication and training is provided. 4. Ensure resource exists to discharge statutory functions 5. Ensure any staff wishing to return to the office during the COVID-19 pandemic have done so in accordance with all corporate processes and procedures.	Lucy West

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