



## Environment & Community Services (ECS) 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	<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. 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	<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, 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	<b>Fuel Availability</b> Fuel shortage impacting on LBB and service provider fleets, and LBB staff transport	<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 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 logooed vehicles 3. Fuel store at Central Depot 4. Ongoing liaison with other London Boroughs concerning collaboration and assistance 5. Continue to check that Service Providers Business Continuity Plans include fuel security actions.	1	4	4	1. Ensure LBB pool cars are available for LBB staff use 2. Adoption of EV pool fleet	Peter McCready
4	4	All E&PP	<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. 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	<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	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	8	Environment	<b>Health &amp; Safety (ECS)</b> Ineffective management, processes and systems within department	<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	3	4	12	1. Workplace Risk Assessments (including lone and home working) 2. Accident & Incident Reporting system (AR3 & Riddor) 3. Contractor Inspection electronic Reporting system 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. Majority of staff still home working unless unable to do so.	2	4	8	1. Ensure Workplace Risk Assessments (inc. Homeworking) updated annually and biennial reviews conducted 2. Encourage routine reporting of accidents and incidents using AR3 form (and reporting of RIDDOR incidents) 3. Ensure the necessary ongoing 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. 6. Ensure that recent H&S concerns noted during inspections of depots at Beaverwood, Central Depot (Waldo Road) and Churchfields are assigned Capital investment to bring the sites up to the required standard.	Lucy West
7	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 Highways contract 9. Modernisation of contractor's programming and completion of maintenance repairs involving remote working ICT technology	3	2	6	2. Additional inspections carried out and repairs undertaken as necessary	Garry Warner
8	13	Neighbourhood Management	<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 in place (contract commenced April 2019) 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 5. Review Tree Risk Management Strategy (annually) 6. Review the 'Storm Strategy' annually to be able to respond quickly and call in additional staff, equipment and contractors 7. Provide a cyclical safety survey and remedial works schedule commensurate to budget availability and potential prioritisation	2	3	6	1. Continue to monitor completion of annual tree surveys by Arboriculture Team ensuring programme requirements are met. 2. 2022/27 Tree Management Strategy to be approved by Env. PDS November 2022	Hannah Jackson

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9	14	All E&PP	<b>Income Variation (Highways, Traffic and Parking)</b> Loss of income when the Council is looking to grow income to offset 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 - Lower than predicted income from Penalty Charge Notices for Moving Traffic Contravention cameras due to changes in traffic volume and patterns - Failure of APCOA to provide contracted services (e.g. strikes) - Reduction in TfL LIP funding for traffic and road safety schemes  <b>Effect (s):</b> - Loss of income with potential to reduce service delivery funds	Service Delivery / 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 9. Engagement with TfL via LoTAG and London Councils to lobby TfL for adequate borough funding.	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 take forward Local Implementation Plan (LIP).	Angus Culverwell
10	15	Neighbourhood Management	<b>Waste Budget</b> Increasing waste tonnages resulting in increased waste management costs	<b>Cause(s):</b> - COVID-19 pandemic impacted the amount of waste generated by Bromley Households and Businesses with 2021/22 having the highest amount of waste managed ever. Tonnages are lower in 2022/23, but uncertainty remains around future arisings due to sustained changes like home working and deliveries. - Failure to anticipate/manage waste management financial / cost pressures due to increasing cost of disposal, increasing property numbers, declining recycling income (lower paper tonnages or rejected wet paper loads) and limited alternate treatment capacity. - Waste tonnage growing faster than budgeted or operational factors (i.e. adverse weather conditions, additional home working following the COVID-19 pandemic etc.)  <b>Effect (s):</b> - Budgets being exceeded and potential knock-on impact on other Council services	Financial	5	4	20	1. Cost pressures recognised in Council's Financial Strategy 2. Continue to send virtually zero to landfill, minimising any landfill tax increase 3. Continued focus on promoting waste minimisation and recycling (e.g. in Environment Matters and through targeted campaigns and initiatives) - 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 4. Reviewing and benchmarking operational costs to identify options 5. Monitoring procedure in place (from December 2019) for the testing of paper loads to determine moisture content.	3	4	12	1. Continue to work with Veolia to ensure that recycling services are offered to residents during unusual circumstances i.e. HGV driver shortage, pandemic, extreme weather events.	Peter McCreedy
11	18	All E&PP	<b>Town Centre Businesses and Markets</b> Loss of town centre businesses to competition and as a result of the COVID-19 pandemic	<b>Cause(s):</b> - The continued effects of the COVID-19 Pandemic reducing peoples disposable income or reducing the footfall to busy places like the market. - Traders not recovering from temporary closures during 2020/21 and 2021/22. - Electric infrastructure issues with the gfas meaning LBB cannot provide power to businesses  <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	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 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 to seek their involvement in cross-promotion of Bromley Town Centre. 7. Markets Manager 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. The Market Team conduct ongoing monitoring of Bromley town footfall, trader numbers, capacity of the market so that ad hoc traders can be brought in wherever possible to fill any vacant stalls. 3. The Market Team liaise with R&I in regards to initiatives for the town centre. 4. Detailed annual action plan to be drawn up for each town centre 5. The Market Team are progressing the development of a communications strategy for promotion of the market with the communications team. 6. The Market Team continue to liaise with Highways to ensure that the gfas units are maintained. 7. Testing specialist markets as part of Town Centre recovery planning	Peter McCreedy
12	20	All E&PP	<b>Staff Resourcing and Capability</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). Lack of incentive for good staff to remain at LBB.  <b>Effect (s):</b> - Loss of organisational memory, greater reliance on contracted staff, delays in delivering services / plans (e.g. Transport Local Implementation Plan). Inability to effectively manage contracts as Contract Managers may have started out in a different role (i.e. as Service Managers) and do not have the necessary expertise to do so (i.e. auditing).	Service Delivery	3	4	12	1. Ongoing programme to find and retain quality staff through internal schemes such as career grades and ongoing CPD	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. Explore apprenticeship scheme as a possibility to ensure this team can maintain deliverables of the service in terms of client inspections and reporting. Enlist contractor to assist with tree survey backlog.	Colin Brand
13	22	All E&PP	<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 in addition to reputational damage caused by perceived lack of action to tackle climate change	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
14	26	Neighbourhood Management	<b>Income Reconciliation (Waste Management)</b> Failure to realise full cost recovery through income generation	<b>Cause(s):</b> - Volatility of the recycle market - Reduction in the amount of recycle collected due to forthcoming government system changes i.e. deposit return system, wet paper rejections or increased waste minimisation/ reuse.  <b>Effect (s):</b> - Loss of income from Commercial Waste and Green Garden Waste services with potential to reduce service delivery funds - Costs incurred as a result of additional last minute resources required to deliver services - Reputational damage	Financial	3	2	6	1. Regular income monitoring 2. Good debt recovery systems 3. Monitoring of activity through Performance Indicators	1	2	2	1. Refine procedure for reconciliation of expected income against actual and provide suitable training for staff to deliver this... 2. Work with Veolia to review the commercial waste service offer to businesses with a view to provide a recycling offer and grow the commercial waste customer base. Cost neutral proposal but could have some indirect cost benefits.	Peter McCreedy



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15	35	All E&PP	<b>Risk to Health</b> - Ill health resulting from enforcing Health Protection COVID 19 Restrictions Regulations 2020 or from operating public sites	<b>Cause:</b> -COVID 19 pandemic and the National requirement that Environmental Health and Trading Standards Officers enforce the COVID 19 Health Regulations. - Operational activities requiring staff to undertake site visits or to operate public facilities. <b>Effect:</b> -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 arms 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) is available and must be used. 2. Assessments for bulky waste collections undertaken via telephone.	3	3	9	1.To regularly review the risk assessments	Colin Brand
16	40	Neighbourhood Management	<b>Disruption to waste services during the Depot Improvement Programme works in 2023/24</b>	<b>Cause</b> - The depot improvement programme involves significant infrastructure works at the Council's operational depots over an 18 month period. The works themselves will impact services as will any delays. <b>Effect(s)</b> - Closure of all or part of the Waste Transfer Station means there is limited space to store waste, resulting in additional costs to find alternatives, it could also limit ability to recycle as much of the waste collected as possible. - Closure of Reuse and Recycling Centre at one or both sites (Waldo Depot & Churchfields Depot) means additional cost if alternative needs to be sourced	Service Delivery	5	4	20	1. Working closely with the Depot Improvement Programme Consultants and stakeholders on the phasing plan for the works to minimise any potential disruption. 2. Relocation of the two weighbridges from Waldo Road entrance to Baths Road entrance as part of the detailed design will mean that the works at Waldo Depot can be phased in a way that the site can operate throughout. 3. Consider council sites as locations for temporary waste storage and/ or recycling sites 4. Produce a communications plan to ensure that residents and businesses are aware of any planned changes to the site and their services.	3	4	12	1. Mitigation has been considered as part of the detailed Depot Improvement Programme plan and is likely to include phasing of the works at Waldo Road Depot to ensure that the majority of the site can remain open at all times during the period of the infrastructure works. 2. Works at Churchfields Depot will be completed first to provide additional contingency for Waldo Road. It is likely Churchfields will need to be closed as the works are completed. 3. Booking systems and other measures such as only allowing residents with odd/ even numbers into the Reuse and Recycling Centre are being considered as part of the mitigation plan.	Peter McCreedy
17	42	Environment	<b>Supplier Failure</b> Key suppliers can no longer deliver contracted services	<b>Cause(s):</b> - Financial failure (e.g. insolvency) - Relationship breakdown between supplier and council - Failure to meet performance requirements <b>Effect(s):</b> - Failure to fulfil statutory duties in timely manner - Disruption to service provision	Service Delivery	3	5	15	1.Contractual terms safeguard the council from impacts of supplier insolvency 2.Contract governance arrangements include strategic and operational contract monitoring regimes to monitor supplier health 3.Performance Management Frameworks include RAG status, monitors trends month on month, and triggers corrective action plans where necessary. 4.Business continuity plans in place for contractors to manage service delivery in challenging circumstances.	3	4	12	1. Contingency plans to be developed in case of supplier failure.	Colin Brand

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