

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

										DATE LAST REVIEWED:	22/09/2022		
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
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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	- 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	- 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

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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	<ul style="list-style-type: none"> <li>- One-off funding required to support transformation programmes and workstreams</li> <li>- Review HR Processes in light of new working arrangements</li> </ul>	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

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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> <b>Including in relation to the following areas:</b> <b>Fire Safety</b> <b>Lone Working</b> <b>Violence &amp; Aggression at work</b>	<b>Cause(s):</b> - Inadequate risk assessments - Outdated policies and processes - Poor use of data around accidents/near miss incidents - Lack of capacity to discharge the Council's H&S responsibilities - Lack of clarity over the breakdown of responsibilities across the organisation - 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. HSW Policies reviewed and updated regularly - ongoing 2. Commitment to HSW from Chief Executive and Directors 3. Supported by HSW training and network of policies and procedures. 4. Property-related HSW matters now provided in-house 5. Corporate Health and Safety Committee and Departmental Safety Committees meet regularly 6. Quarterly health and safety updates provided to Corporate Leadership Team (CLT)	3	4	12	- Risk assessment & proactive monitoring being developed for Council.  - Health and Safety policy to be revised to set out the organisation's general approach to health and safety.  - Informal 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 Corporate Health and Safety 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	- Ensure all staff do mandatory H&S training 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

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12	Customer Services	<b>Contractor Failure</b>	<p><b>Cause(s):</b> Contractor (such as Liberata) cease trading due to financial or other failure.</p> <p><b>Effect(s):</b> Interruption to or deterioration of service due to failure of contractors (out of hours security guards @ Civic Centre, for example)</p>	Contractual and Partnership - Operational	2	4	8	<ul style="list-style-type: none"> <li>- Regular monitoring of performance and monthly operational meetings to identify any continued and ongoing reduction in service delivery</li> <li>- Core contract monitoring and overview of other elements of the contract to identify shortfalls in other areas of service delivery</li> <li>- Effective scrutiny of potential contractors</li> <li>- Appropriate performance bonds or parent company guarantees</li> <li>- Business continuity planning</li> <li>- Standardised contract letting procedures and documentation as contracts renew</li> </ul>	2	3	6	-Identify potential alternative contractors	Duncan Bridgewater
13	Customer Services	<b>Contractor Performance</b>	<p><b>Cause(s):</b> Failure to effectively manage service delivery contracts with provided such as Liberata</p> <p><b>Effect(s):</b> Continued and ongoing poor performance and/or increased customer complaints.</p>	Contractual and Partnership - Operational	4	3	12	<ul style="list-style-type: none"> <li>- Daily, weekly, monthly and annual monitoring of performance and key performance indicators</li> <li>- Monthly operational meetings with contractor to discuss performance and monitor against balanced score card</li> <li>- Escalation through core contract route of any continued and ongoing shortfalls in performance</li> </ul>	3	2	6		Duncan Bridgewater
14	Customer Services	<b>Maintenance of Statutory and GRO standards</b>	<p><b>Cause(s):</b> Increase in life events (births / deaths) within Bromley Staffing pressures</p> <p><b>Effect(s):</b> Drop in standards leading to a potential breach of statutory duty and loss of confidence from residents.</p>	Legal - Operational	3	3	9	<ul style="list-style-type: none"> <li>-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</li> <li>Annual report produced in Spring</li> </ul>	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	<p><b>Cause(s):</b> Major power failure or other incident that prevents access to the Civic Centre</p> <p><b>Effect(s):</b> Major disruption to council services</p>	Data and Information - Operational	3	3	9	<ul style="list-style-type: none"> <li>- Existing local resilience procedures (overflow to alternative Liberata Office)</li> <li>Considered as part of the overall corporate business continuity plan if temporary accommodation required</li> </ul>	2	2	4		Duncan Bridgewater
16	Customer Services	<b>Safety of Statutory Records</b>	<p><b>Cause(s):</b> Fire / flooding Strong room not GRO compliant</p> <p><b>Effect(s):</b> Damage to or destruction of historic statutory registration records</p>	Operational	2	4	8		2	4	8	<ul style="list-style-type: none"> <li>- 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</li> </ul>	Duncan Bridgewater

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