



Public Protection and Enforcement (PP&E) Risk Register

TfL London Borough														DATE LAST REVIEWED:			02/03/2023	
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			FURTHER ACTION REQUIRED	RISK OWNER				
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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	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				
4	14	All E&PP	Income Variation (Highways and Parking) Loss of income when the Council is looking to grow income to offset reduced funding	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 2. Monitor income trends 3. Continue to monitor success in achieving enforcement objectives 4. Intelligence-led targeting of hotspot sites for enforcement 5. Review of further income opportunities as part of Council's Transformation agenda 6. Accelerate removal of P&D machines in favour of cashless payment 7. Consider relocation of MTC cameras 8. Council to consider rep profiling highway improvements and behaviour change projects if funding is reduced to implement Local Implementation Plan (LIP).	Angus Culverwell				
5	18	All E&PP	Town Centre Markets Loss of town centre market business as a result of high inflation and the cost of living crisis.	Cause(s): High inflation rates and the cost of living crisis-reducing peoples disposable income or reducing the footfall to busy places like the market. - Electric infrastructure issues with the gifas affecting LBB's ability to provide power to market traders Effect(s): -Reduction in market stall occupancy -Loss of income from market stalls) -Poor public & trader perception	Financial	4	3	12	1. BID Teams and Economic Development organise town centres events 3. Regular advertising / promotion of market 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 BID 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&R in regards to initiatives for the town centre. 4. 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 gifas units are maintained. 7. The Market Team are supporting the testing specialist markets as part of R&R's Town Centre recovery planning	Peter McCready				
6	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)	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 TfL 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. 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).	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. 2. 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				

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7	22	All E&PP	Climate Change Failure to adapt the borough and Council services to our changing climate	Cause(s): -Severe weather events including extreme heat, storms, floods etc. 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	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
8	28	Public Protection	Dogs Contract Failure to deliver the contract to the required service levels	Cause(s): -Insolvency of contractor Effect (s): -Inability to deliver statutory functions -Reputational damage	Service Delivery	2	4	8	1. Identification of named Contract Manager 2. Regular contract management meetings with service provider 3. Review of contract specification to identify change control requirements	2	2	4	1. Contract recently awarded in February 2023 for an initial 3 year term with 2 years discretionary extension 2. The new contract is for a Stray Dog & Rehoming service. Pest control services have been decommissioned in accordance with PDS decision	Sarah Newman
9	29	Public Protection	Out of Hours Noise Service Failure to deliver service	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 was presented and an option approved at PPE & PDS in January 23. This decision is now out of the call-over period and will be actioned. Effect: Occasional inability to deliver Out of Hours Noise Service.	Service Delivery	4	4	16	1. Annual review with MOPAC on service outcomes 2. Exploring the cost of a centrally funded OOH service and options for delivery models discussed with Portfolio Holder & Committee 3. Amend website to manage customer expectation 4. Consider making the OOH rota mandatory in new EH enforcement work 5. Commence making arrangements to deliver recent decision. Current anticipated go-live for new OOH Noise service arrangements is September 2023, depending on successful recruitment of appropriately qualified and experienced staff to fill the new rota	2	4	8	1. Press MOPAC confirmed funding status through to 2025 and continue to bid for further funding beyond that. 2. Report to Portfolio Holder assessing service provision options for consideration to mitigate this risk. Report presented at PPE PDS Committee in January 2023 3. Continue to encourage officers to participate in rota as the number of volunteers remains low 4. Enact decision and make arrangements for a go-live for the approved revised OOH Noise Service arrangements. Indicative timeline for implementation is new service launched ready for peak demand in 30/06/23.	Sarah Newman
10	30	Public Protection	Integrated Offender Management post: Failure to contribute to London wide IOM	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. Effect: Inability to contribute to IOM in Bromley.	Service Delivery	3	3	9	1. Annual review with MOPAC on service outcomes. Funding is secure April 2023 - March 2025	2	2	4	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
11	31	Public Protection	Community Impact Day Co-ordinator post: Failure to deliver ASB and arson problem solving and partnership activity	Cause(s): -This post receives funding from a MOPAC grant for 3 years which is confirmed 1 year at a time, thus is vulnerable. This post is responsible for delivering targeted community project work to reduce crime, particularly arson and ASB in 4 priority wards with partner agencies. Potential for short notice reduction or cessation of the grant. 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.	Service Delivery	3	3	9	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 result. CIDs would have to be reduced in scope and outcomes 2. Funding for this post is secure from April 2023 - March 2025	2	2	4	1. Review of CID focus, arrangements and activities to allow for MOPAC project delivery at reduced cost. 2. 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
12	32	Public Protection	Serious Youth Violence & Gangs Officer post Failure to deliver gang problem solving and partnership activity	Cause(s): -This post has funding from MOPAC for 3 years, which is provided 1 year at a time, thus is vulnerable. The post is responsible for the strategic coordination of gang intervention and partnership working to reduce serious youth violence. -Potential for short notice reduction or cessation of the grant. Effect: -Inability to fund this post would result in the cessation of strategic coordinated gang disruption work and serious youth violence reduction work with partners. -The salary shortfall of this post is currently met by Public Protection salaries budget.	Service Delivery	3	3	9	1. Annual review with MOPAC on service outcomes 2. Reapply for funding in Autumn 2024	2	2	4	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
13	33	Public Protection	The provision of 24/7 CCTV Monitoring	Cause: -Impact of sickness on staff in the control room Effect: -Loss of officers through sickness arising from a potential future pandemic or serious allergies leading to an inability to provide 24-7 CCTV monitoring .	Service Delivery	3	4	12	1. The CCTV Supervisor takes steps to ensure the room is protected from overcrowding. Two members of staff also have a nut allergy and there is clear signage at entry points about the risk posed and the need to keep nuts out of the room.	1	3	3	1. Monitor and review monthly with Contractors	Rob Vale
14	34	Public Protection	Loss of Income from Licensed Premises Fees	Cause: - Wider economic trends and their impact on licensed premises and hospitality sector's viability further impacting on achieving income targets 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 received the income for the first 11 months of the financial year and have not received any requests to refund existing licences. However, there is a future risk that the expected income target may not be met due to failing businesses.	Financial	3	3	6	1. For most businesses the licence is a minor cost. They are more concerned with business overheads such as energy, staffing, material and equipment costs and rent and rates. 2. Expected income targets are almost fully met as we approach the end of the fiscal year but a lengthy economic downturn could impact on income significantly. 3. An accurate future forecast is not available in the current economic climate. The Division is starting to see increased churn with regard to food premises, but the effect is not yet as profound for licensed premises.	2	2	4	1. Monitor and review income quarterly	Sarah Newman



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15	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 elevated excess deaths 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
16	39	Public Protection	Dysfunctionality of Uniform Information Management System	Cause - This is a legacy data system and there has been a lack of investment and technological improvements it is now barely functional or fit for purpose. Effect - The dysfunctionality of Uniform affects how data is/is not recorded, retrieved and analysed. Data is not always able to be saved or retrievable and there are significant difficulties with providing reliable data reports. - There are significant issues and blockages to connecting to the system remotely which is preventing the required advances in service efficiency.	Service Delivery	5	4	20	1. Software updates in May 21 improved the performance of the Uniform system. 2. The division is currently in the process of upgrading the software to Idox Cloud which is expected to be implemented in Autumn 2023.	3	4	12	1. Idox Cloud will mitigate the reliance on the local Civic Centre servers as the new system is Cloud based. The project commenced in late September 22 and is currently on course to be fully implemented in Autumn 2023.	Rob Vale
17	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. Fire responsible persons list in place for all sites under the control of E&PP 6. EPP Health and Safety Committee meets regularly to review departmental Health and Safety arrangements. 7. All corporate policies followed for risk assessments 8. All corporate policies and procedures followed by all staff and managers.	2	4	8	1. Ensure Workplace Risk Assessments 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 staff returning to the office following illness do so in accordance with corporate HR processes and procedures. 6. Ensure that recent H&S concerns noted during inspections of depots at Beaverwood, Central Depot (Waldo Road) and Churchfields are addressed and updates will be provided to the quarterly Corporate Health and Safety Board.	Lucy West

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