

Housing, Planning and Regeneration Risk Register

REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press shift & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK			FURTHER ACTION REQUIRED	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
1	All	Failure to deliver against Housing Financial Strategy	<p>Cause(s):</p> <ul style="list-style-type: none"> - Demand led statutory services which can be difficult to predict - High number of households meeting criteria for temporary accommodation - Lack of suitable housing - Increased costs at 2 Traveller Sites for repairs and maintenance - Impact and inflation and increased demand on accommodation for temporary accommodation across London - Temporary accommodation not keeping pace with increasing costs of temporary accommodation <p>Increase number of households approaching</p> <p>Effect(s):</p> <ul style="list-style-type: none"> - Failure to achieve a balanced budget 	Financial	5	5	25	<ul style="list-style-type: none"> - Match financial planning to Council priorities - Plans to deliver increased housing supply through increased acquisitions - Conditions attached to s106 to ensure it is spent on additional affordable housing provision to reduce the reliance on temporary accommodation - Budget monitoring and forecasting - Regular reporting to CLT and Members via the Committee reporting process - Internal audit framework - Regular review of strategies to prevent homelessness and identify/develop temporary accommodation housing - Determination at planning stage to ensure collection of obligations due (S106) - Conditions attached to S106 funding received to ensure it is spent on preventing homelessness - Constantly reviewing service operations for potential efficiencies - All relevant statutory strategies implemented 	4	5	20	<ul style="list-style-type: none"> - Ensure the continued delivery of the housing schemes as set out in the Transformation Board Housing Plan - Complete the feasibility studies for the Phase 2 housing development sites - Close monitoring required for homeless approaches. This will allow earlier identification of any changes in homelessness demand which could have an impact of adding further financial pressures 	Director, Housing, Planning and Regeneration (Sara Bowrey)
2	Housing Needs	Failure to deliver effective Housing Needs services The Council is unable to deliver an effective Housing Needs service to fulfil its statutory obligations	<p>Cause(s):</p> <ul style="list-style-type: none"> - very demand led - difficulties in recruiting experienced staff - homelessness is increasing in number and complexity of cases needing maximisation of early intervention - Lack of awareness of where households need to approach services - Lack of suitable housing options. <p>Effect(s):</p> <ul style="list-style-type: none"> - Failure to fulfil statutory obligations - Impact on life chances and outcomes for individuals and families in need of Housing Services - Reputational damage - Legal challenge - Financial Impact 	Legal	4	4	16	<ul style="list-style-type: none"> -The homelessness forum has been established and is taking forward the priorities of the homelessness strategy - Implementing the Homelessness Strategy - the multi-agency Homelessness Forum has been established and implemented and other priorities of the Strategy are being taken forward - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - Housing Transformation Board programme being implemented - Implementation of new Housing schemes to ensure the supply reduces the reliance on nightly paid accommodation - Provide a competitive private sector offer - All relevant statutory strategies implemented - Ensuring grant funding is pursued and properly utilised. - Comprehensive and flexible approach to managing homelessness with a range of schemes to support households to either remain in their own home or to secure affordable accommodation. 	2	4	8	<ul style="list-style-type: none"> -The majority of officers are now attending the office 2 + days per week. - North Block reception is now open and clients are being seen face to face on an appointment basis - Recruitment is progressing and a number of posts have been recruited to and contracts are commencing. 	Assistant Director, Housing (Lynnette Chamielec)
3	Housing Needs	Temporary Accommodation Inability to effectively manage the volume of people presenting themselves as homeless and the additional pressures placed on the homelessness budgets	<p>Causes:</p> <ul style="list-style-type: none"> - Changes in government funding - Rising number of placements (approx. 15 per month) - Lack of local, affordable sustainable options - Increased homelessness and lack of access to accommodation <p>- uncertainty around the impact of move on requirements for schemes such as Homes for Ukraine, Afghanistan resettlement programme</p> <p>Effect(s):</p> <ul style="list-style-type: none"> - Failure to fulfil statutory obligations - Impact on life chances and outcomes for individuals and families in temporary accommodation - Increased risk of legal challenge due to provision of unsuitable accommodation (including shared accommodation) - Pressure on other services - Increase in the number of out of borough placements 	Legal	5	4	20	<ul style="list-style-type: none"> - Focus on preventing homelessness and diversion to alternative housing options through:- - Landlord and Tenancy advice, support and sustainment - Assistance, (including financial aid) to access the private rented sector - Access to employment and training - Debt, money, budgeting and welfare benefits advice, including assistance to resolve rent and mortgage arrears - Sanctuary scheme for the protection of victims of domestic violence - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - Development of social housing on LBB sites and implementation of Meadowship Homes acquisition - Implementing the Homelessness Strategy - setting up the multi agency Homelessness forum and taking forward the priorities of the strategy - New incentive campaign for private sector landlords embedded and benefits being realised 	4	4	16	<ul style="list-style-type: none"> - The Phase 1 Meadowship Homes scheme is almost at completion - Converting tenancies in the More Homes Bromley scheme from temporary to permanent - Complete the feasibility assessment for Phase 2 of the Bromley Housing Development Programme - Implement Phase 2 of Meadowship Homes Scheme, which will see the purchase of a further 200+ properties - Undertake a programme of the SLA agreements and quality assurance for temporary accommodation to ensure that accommodation procured meets all required accommodation standards - Review the requirement for block bookings to secure temporary accommodation supply 	Assistant Director, Housing (Lynnette Chamielec)
4	Housing Needs (Housing Strategy)	Capital Grant Failure to deliver the Council's affordable housing strategy in support of statutory obligations Lack of infrastructure in place where growth is occurring	<p>Cause(s):</p> <ul style="list-style-type: none"> - Lack of availability of external capital grant (Housing Associations) to deliver key housing schemes - Lack of available suitable sites within the borough on which to develop new affordable housing schemes over the short to medium term together with delays in completing developments - Potential fluctuations in house prices and supply chains - Schemes not granted planning permission to develop identified sites <p>Effect(s):</p> <ul style="list-style-type: none"> - Failure to fulfil statutory obligations - An inadequate supply of housing will lead to an inability to meet housing needs of a range of client groups in support of statutory housing and homelessness duties. 	Social	4	4	16	<ul style="list-style-type: none"> -Participation in negotiations on the affordable housing provision on section 106 applications, ensuring that the affordable housing obligation reflects local adopted planning policy and local statutory and high priority housing need - Work underway to streamline the S106 process to ensure that the Council maximises the use of available funding to meet housing needs - Determination at planning stage to ensure collection of obligations due - Conditions attached to funding received to ensure it is spent on preventing homelessness - Development group with Housing Associations established to improve relationships with planners and developers to increase supply of affordable housing - Bromley Federation of Housing Association Meetings resumed. - working with the GLA to negotiate favourable grant levels to enable proposed affordable housing schemes to proceed 	3	4	12	<ul style="list-style-type: none"> - Discussions held with individual registered providers. - Planning seeking to maximise affordable housing delivery through planning consents and s106 funding - Ongoing negotiations to maximise grant rates for affordable housing delivery 	Assistant Director, Housing (Lynnette Chamielec)
5	Housing, Planning and Regeneration	Recruitment and Retention Failure to recruit and retain key skilled staff with suitable experience/qualifications	<p>Cause(s):</p> <ul style="list-style-type: none"> - Failure to compete with other organisations to recruit the highest quality candidates to build an agile workforce - Small pool of experienced workers <p>Effect(s):</p> <ul style="list-style-type: none"> - Failure to identify and meet service user needs - Provision of service to ineligible clients - Provision of service prior to/without appropriate authorisation - Lack of skill sets result in an inability to deliver effective housing services and planning services as well as progressing housing and regeneration schemes. - Impact on life chances and outcomes of families and young people. 	Personnel	5	4	20	<ul style="list-style-type: none"> - Recruitment drive to convert locums to permanent staff - Council's recruitment web site includes a video virtual tour of the Council in housing - Support in effectively managing staff performance - Bespoke training for first line managers - Training and quality assurance of best practice - Role on Recruitment and Retention Board - Review the recruitment/retention of housing staff including packages for retaining staff - Developing apprenticeship and trainee roles in Planning Services - Grading and role responsibilities for key posts benchmarked - Promotion of employment prospects and career progression in Bromley enhanced - Working with specialist recruiters. - Salary benchmarking and key roles consideration 	2	4	8	<ul style="list-style-type: none"> - Consideration to be given around succession planning across the department - Recruitment and retention package developed. 	<p>Director, Housing, Planning and Regeneration (Sara Bowrey)</p> <p>Supported by Director, Human Resources (Charles Obazuaye)</p>

Housing, Planning and Regeneration Risk Register

REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press shift & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK			FURTHER ACTION REQUIRED	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
7	Housing, Planning and Regeneration	Business Interruption / Emergency Planning Failure to provide Council services or statutory requirements of mass illness/fatalities scenario following a business interruption or emergency planning event	Cause(s): - Business Interruption could be caused by Loss of Facility (fire, flood etc.), Staff (illness, strike) or IT (cyber attack). - Mass fatalities or illness has a range of causes and this risk to the council could be caused by council staff being impacted resulting in failure to manage statutory requirements of mass illness/fatalities scenario (e.g. registering of deaths within timescales) Effect(s): - Business interruption - failure to deliver services, loss of customer / resident satisfaction. - Emergency planning - failure to deliver statutory duties.	Personnel	2	5	10	Business Interruption - Civil protection and emergency planning policies in place at corporate level overseen by the Corporate Risk Management Group - Business Continuity Plans in place at service level. Reviewed and updated. - Contracts contain business continuity provision - Communication to all staff prior to all impending industrial action, informing of any possible service disruption as well as explaining implications of strike action for individual staff members Emergency Planning - Robust plans in place, including Outbreak Plan, Flu Plan and Pandemic Flu Plan - Alert system via the South East London Health Protection Unit (SEL HPU) - Annual Flu vaccination programme in place	1	5	5	- Business Continuity Plans reviewed annually - Review business continuity plan with key partner agencies - Undertake business continuity plan stress test exercise	Director, Housing, Planning and Regeneration (Sara Bowrey)
8	Strategy, Performance and Corporate Transformation	Data Collections Failure to undertake statutory statistical data collections; including key housing and planning information, thereby adversely affecting government grant allocations and performance assessments	Cause(s): - Business Interruption - IT systems do not keep pace with legislative reporting requirements Effect(s): - Failure to commission effectively - Adverse impact on the timing and quality of decision making	Data and Information	3	3	9	- Schedule of statutory returns has been incorporated into the Performance and Information team's work programme - Specialist members of the team for each area - Other staff trained to provide 'back up' for specialist members of the team - Good project planning in place to co-ordinate all data collections including contributions from other services	1	3	3	- Complete contract extension for the Orchard Housing system to ensure operational continuity - Reports under continued improvement programme. - Acquire and implement new Planning IT system	Director Housing, Planning and Regeneration (Sara Bowrey) Supported by Assistant Director, Strategy, Performance & Corporate Transformation (Naheed)
9	Strategic Property	Financial Performance Failure to reach expected income through rental income and property disposal	Cause(s): - Failure to lease all properties - Failure to eliminate rent arrears - Downturn in property market - Non-payment of rent on properties - Failure to realise anticipated sale values for property disposal programme Effect(s): - Reduced rental income - Reduced capital income - Impact on overall Council budget	Financial	3	5	15	- A programme of rent reviews, lease renewals, new lettings, lease renegotiations, cost recharges and cost refunds is being carried out by the property team. - Rental deferments monitored and repayment plans arranged from property portfolio. Implementing the approved investment portfolio strategy to ensure investment properties are maintained to suitable standards to maximise income	2	5	10	- Implement the disposal programme as approved at November 2022 Executive, the revenue impacts of such disposals have been reported to Finance for their revenue impact monitoring (July 2023) over the financial years 2023/24 and 2024/25	Assistant Director, Strategic Property (Amy Milton)
10	Strategic Property	Health and Safety Regulations Failure to comply with statutory regulations with regard to the built environment in Council occupied and leased properties	Cause(s): - Inadequate risk assessments - Lack of capacity to discharge the Council's H&S responsibilities with regard to the built environment - Ineffective monitoring of risks Effect(s): - Potential prosecution of Council and/or civil claims for compensation - Insurance claims - Potential accidents/fatalities - Corporate manslaughter	Physical/ Legal/ Financial	3	5	15	- Safety Policies reviewed and updated - Contractors held to account for managing Council premises to required legal standards	2	5	10	- Implementation of the agreed health and safety building maintenance work identified through the operational strategy review, to ensure council retained properties maintain statutory requirements - Programme is progressing on track, with the surveys being undertaken at present, and the outcomes reported back to Members for approval for draw down of capital spend in Autumn 2023.	Assistant Director, Strategic Property (Amy Milton)
11	Strategic Property	Contractor Performance Failure to deliver facilities management service	Cause(s): - Inadequate qualified staffing resources - Lack of capacity to deliver outcomes Effect(s): - Failure to deliver statutory obligations - Poor performance impacts on work of Council officers	Contractual and Partnership - Operational	3	5	15	- Regular monitoring of performance and key performance indicators - Contractors make regular reports to Members on delivery of contract - Contract reviewed and escalation for change available subject to Contract Change Notification - Business continuity plans in place and draft Exit Plan received	2	5	10	- New supply chain being formulated which include mitigation factors to ensure performance failure and service is de-risked. - July 2023 Exec approved FM strategy for new Churchill Court building making a direct award to Ascot Services who are the incumbent provider. This will be for a period of max 2 years whilst a full tender for a scope of works tbc can be facilitated. - An Exec Committee report will go forwards in Sept 2023 on the re-tendering strategy for all FM contracts as those that are in place at present were short term solutions following the insourcing of the FM function from the TFM contract. Intention is that a 2 contract provision for the Council's HQ estate and all other properties is market tested against a pre determined specification and comprehensive asset register for those properties the Council is retaining by April 2024 (with Churchill Court to follow in 2025) - Whilst this external procurement process continues a review of the existing FM team will need to be undertaken to move it into a functioning commissioning / intelligent client model team.	Assistant Director, Strategic Property (Amy Milton)

Housing, Planning and Regeneration Risk Register

REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press shift & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK			FURTHER ACTION REQUIRED	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
12	Culture and Regeneration	Outreach Service Failure to provide service in Cotmandene and Mottingham	Cause(s): <ul style="list-style-type: none"> - Buildings vulnerable to water and sewerage issues - Small staff base vulnerable to stress and lone working Effect(s): <ul style="list-style-type: none"> - Failure to deliver full service - Closure of outreach centres - Impact on vulnerable adults - Closure of the Mottingham site and relocation with library with lack of space for both services 	Social	4	4	16	<ul style="list-style-type: none"> - Staff experienced in successfully averting aggressive behaviour. - Regular Team Meetings to discuss issues and address staff wellbeing as well as participation in training opportunities to help wellbeing - Co-location opportunities agreed with libraries and integration of service with GLL: Mottingham relocated to Mottingham Library temporarily; Cotmandene collocated with St Paul's Cray Library permanently at refurbished site. 	3	4	12	<ul style="list-style-type: none"> - Progressing TUPE of staff to GLL and libraries contract variation to combine services -Refurbishment and relaunch of St Paul's Cray Library to operate as a co-located facility housing Library and Outreach Services -Review of Outreach Service provided at Mottingham Library after six months and twelve months, and scoping of alternative sites for permanent location 	Assistant Director, Culture and Regeneration (Lydia Lee)
13	Culture and Regeneration	Vitality and Prosperity of Town Centres Failure of town centres to attract footfall and spend for retail and leisure opportunities	Cause(s): <ul style="list-style-type: none"> - Failure to redevelop High Streets and diversify the offer - National trend for decline in the traditional retail sector in town centres and competition from out of town developments and online shopping - Risk that established Business Improvement Districts do not succeed at renewal or that planned Business Improvement Districts do not get established resulting in reduced revenue spend to support businesses in town centre locations. - Poor development in town centres / - Lack of investment in town centre facilities and public realm. - Impact of external factors on local economy / - Supplier/contractor issues and increased contractor/supplier costs - Planning applications refused / - Lack of stakeholder interest and support for improvements - General site constraints preventing progress/project delivery / - Beckenham rebalot fails Effect(s): <ul style="list-style-type: none"> - Reduction in town centre business occupancy and increase in vacancies - Loss of income from business rates and market charges, and reduction in income from parking charges - Poor public perception and negative publicity. / - Lack of private sector or inward investment. - Reduction in property value. / - Reduction in footfall and spend per head resulting in loss of business. - Delays delivering public realm improvements / - Public Realm Improvements projects have to be terminated - Potential costs to the Council to take on a town centre management service, and a lack of investment in the Town Centre 	Economic	4	4	16	<ul style="list-style-type: none"> - Support to Business Improvement Districts through renewal or ballot processes. - Work in partnership with Business Improvement Districts to drive town centre activity that support business success and include programming and events in town centres. - Secure funding for and deliver public realm improvements in town centres - Work with developers to bring forward suitable development that supports the vitality of town centres - Secure developer contributions for the benefit of town centres. - Investigate options for Renewal opportunities in all town centres. - Prioritise investment in town centre leisure facilities. - Bromley Economic Partnership in place to identify issues affecting local economy - Terms of Reference to define relationship between the Business Improvement Districts have been created to better support the local economy. 	4	3	12	<ul style="list-style-type: none"> - Work with businesses to investigate the viability of a Business Improvement Districts in relevant locations - Terms of Reference to define relationship between the Council and BIDs under regular review to ensure it remains relevant. - Work with developers to bring forward sensitive town centre development that also secures improved facilities for community services. - Finalise town centre public realm improvement schemes. - Night Time Enterprise Zone to encourage vibrancy in Bromley Town Centre after 6pm - Night Strategy for the borough to be developed by DEC24 	Assistant Director, Culture and Regeneration (Lydia Lee)
14	Culture and Regeneration	Capital Schemes Failure to deliver housing schemes	Cause(s): <ul style="list-style-type: none"> - Failure to gain approval from Members for business cases on use of land for housing - Failure to secure funding for schemes - Failure to deliver housing schemes on time and in budget - Issues with land ownership and usage - Planning permission not granted or granted with conditions which impact adversely on costs - Inflation and construction costs - Lack of interest from market in developing sites Effect(s): <ul style="list-style-type: none"> - Failure to provide number of accommodation units identified - Failure to produced identified savings as part of Housing Transformation Board programme - Impact on vulnerable families and children - tennants remain in TA for long periods of time - increased revenue pressures on TA 	Financial/ Social	5	5	25	<ul style="list-style-type: none"> - The York Rise development is under construction - The West Wickham development is under construction - Additional resources in Regeneration and Renewals teams dedicated to assess and bring forward a range of housing sites across the borough. - Crystal Palace Regeneration strategy grant funding secured and consultancy team appointed. RIBA 2 due to complete September 23. - Regular liaison with GLA to negotiate grant rates which reflect increase costs due to inflation - Securing fix price tenders for housing delivery. - Bromley North submitted to Planning April 23, anticipated DCC 5/10/23. £720k secured from BLRF2 to support site preparation for this scheme. 	4	4	16	<ul style="list-style-type: none"> - Further conversations required to be developed with services to understand short and longer term requirements of particular sites. - Legal advice sought on ownership and usage issues and actions identified. - Coordination across disposals programme to ensure revenue and housing targets can be met jointly. - Leadership team working with GLA on Crystal Palace. - Further upskilling and knowledge sharing across teams to bring forward development effectively. 	Assistant Director, Culture and Regeneration (Lydia Lee)
15	Culture and Regeneration	Leisure Centres Failure to facilitate and enable the provision of leisure centre services	Cause(s): <ul style="list-style-type: none"> - Service provider ceases to trade due to financial difficulties - Facilities have to close due to plant failure or other serious building maintenance issues Effect(s): <ul style="list-style-type: none"> - Temporary cessation of leisure facilities in the borough - Adverse public response - Social impact on vulnerable adults and families along with the wider population using leisure facilities and activities for health and wellbeing benefits 	Legal Reputational Social	4	4	16	<ul style="list-style-type: none"> -Alliance Leisure contracted to undertake feasibility works for Walnut and West Wickham sites. proposals due to Executive in October 23. - Draft leisure strategy and facility planning works in progress. - Playing pitch review complete. - Proactive Bromley established. 	3	3	9	<ul style="list-style-type: none"> - Continue regular informal contact with MyTime in addition to formal meetings and provide support to resolve issues as necessary. - Leisure strategy and associated documents completed. 	Assistant Director, Culture and Regeneration (Lydia Lee)
16	Culture and Regeneration	Library Service Failure to provide statutory library service	Cause(s): <ul style="list-style-type: none"> - Service provider ceases to trade due to financial difficulties - Council terminates contract because service provider fails to consistently meet KPIs - Service does not meet contracted levels because of industrial action - Ongoing projects affecting permanent library buildings causing relocations and changes to available services Effect(s): <ul style="list-style-type: none"> - Temporary cessation of library service in borough - Adverse public response - Possible impact on partners in shared use buildings - Social impact on vulnerable adults and families using library facilities and activities 	Legal Reputational Social	4	4	16	<ul style="list-style-type: none"> - Ongoing monitoring of service provider to identify potential financial difficulties - KPIs monitored regularly: twice yearly reports to Members and monthly/annual review meetings with service provider. - Exit plan in place to manage any closure of contracted service and bring service in-house which is regularly reviewed and updated. - Library without Walls created as a response to COVID-19 has been retained as the 15th Bromley Library and continues to remain popular with users - Increased provision of activities and events for all age groups following reduction during COVID - Promotion of e-books, newspapers and magazines - Ongoing contact between Service Provider and LBB project teams where ongoing redevelopment projects interferes with usual library operations 	4	3	12	<ul style="list-style-type: none"> - Continue regular informal contact with contractor in addition to formal meetings and provide support to resolve issues as necessary - Inclusion of service provider in regular project meetings and updating on timescales - Repair programme for library buildings to commence 	Assistant Director, Culture and Regeneration (Lydia Lee)

Housing, Planning and Regeneration Risk Register

REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press shift & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK			FURTHER ACTION REQUIRED	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
16	Planning	Planning Service Failure to deliver statutory requirements related to planning	Cause(s): - Failure of Planning IT service - Lack of suitably qualified staff to provide expertise within the service - Risk of bribery identified through internal audit Effect(s): - Council enters 'designation' status due to poor performance on speed or quality of decision making, resulting in major or minor planning decisions being removed from Council decision-making process leading to income loss to Council and lack of local control - Failure to prevent unauthorised development - Failure to respond to planning applications within statutory timescales - Planning decisions overturned on appeal - Failure to enforce Tree Protection Orders, protect listed buildings and conservation areas - Adverse public response - Reputational damage to the council	Legal Financial Reputational	3	4	12	- Planning software upgraded annually and maintained by software developer. - Review of case management software underway with target date of May 2024 for completion of replacement - Staffing levels and skill set appropriate for current levels of demand - Planning Advisory Service (PAS) review of service in June 2019 resulted in an improvement plan which has been delivered to Members - Appeals reviewed and learning implemented. - Planning Advsory Service (PAS) returned to review improvement plan and committees in July 2021 and further recommendations and actions are being pursued. - Existing checking and sign off process in place - Bribery training carried out - Officers required to declare any interest	2	3	6	- Implementation of new Planning IT system - Ongoing monitoring of work volumes to ensure staffing levels are sufficient for work levels	Assistant Director, Planning (Tim Horsman)
17	Planning	Community Infrastructure Levy Failure to collect and spend local CIL and use for local infrastructure	Cause(s): - Failure to collect the local CIL - Failure to use local CIL appropriately Effect(s): - Lack of funding for infrastructure to support new developments - Lack of funding to provide Infrastrure Delivery Team	Legal Financial	2	3	6	- Local CIL has been adopted and commenced in June 2021 - Experienced Infrastructure Delivery Scheme Manager in post to ensure successful adoption of agreed local CIL	2	3	6	- Monitor current impact of inflation on the number of developments coming forward	Assistant Director, Planning (Tim Horsman)
18	Planning	Section 106 Agreements Failure to complete S106 agreements for affordable housing	Cause(s): - Lack of appropriately qualified staff to ensure S106 agreements are implemented as appropriate - Lack of S106 Monitoring Officer in post Effect(s): - Impact on level of supporting infrastructure in borough - S106 monies not being spent on appropriate infrastructure and housing schemes	Financial	3	3	9	- Officer group in place to monitor and maximise s106 spend - Infrastructure Delivery Team Leader in post acting as s106 monitoring officer and overseeing s106 agreements including financial receipts and payments	1	1	1	- Controls have been implemented and working effectively. The risk exists however given the control effectiveness it is no longer deemed to be a material risk and can be removed from being flagged in this risk register going forward.	Assistant Director, Planning (Tim Horsman)
19	Planning	London Plan Failure to deliver level of housing in Bromley contained in Mayor of London's plan	Cause(s): - Mayor of London's Plan requires greater levels of housing to be built in Bromley than in Local Plan - Planning permission for sufficient level of development not granted - Landbanking by developers resulting in targets of new houses not being met in a timely fashion Effect(s): - Bromley penalised at planning appeal stage	Reputational Financial	5	3	15	- Local Plan policies being reviewed to identify suitable sites - Planning and Regeneration teams are seeking to promote appropriate housing development in the Borough	3	3	9	- Local Plan review has commenced	Assistant Director, Planning (Tim Horsman)
20	Compliance & Strategy	Homes for Ukraine Inability to effectively manage the volume of people, including unaccompanied minors who may present as homeless due to cessation of sponsor accommodation, safeguarding concerns and the resulting additional pressures placed on the homeless budgets and childrens social care	Cause(s): 1. Volume of refugees arriving increasing 2. Breakdown in relationship between sponsor and guest 3. Accommodation coming to an end at the pre-agreed period with no alternatives readily available, other than temorary accommodation or foster care Effect(s): - Failure to fulfil statutory obligations - Impact on life chances and outcomes for individuals and families in temporary accommodation, particularly given the vulnerability of the refugees - Increased risk of legal challenge due to provision of unsuitable accommodation (including shared accommodation) - Pressure on Childrens Social Care if the sponsor placement fails and a Foster Placement is required	Housing Social	5	4	20	- Focus on preventing homelessness and diversion to alternative housing options through:- - Landlord and Tenancy advice, support and sustainment - Assistance, (including financial aid) to access the private rented sector - Access to employment and training - Debt, money, budgeting and welfare benefits advice, including assistance to resolve rent and mortgage arrears - Sanctuary scheme for the protection of victims of domestic violence - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - Implementation of the More Homes Bromley initiative to ensure the supply reduces the reliance on nightly paid accommodation - Implementing the Homelessness Strategy - setting up the multi agency Homelessness forum and taking forward the priorities of the strategy - New incentive campaign for private sector landlords embedded and benefits being realised - Modelling taking place to forecast how many households may need accommodation around the 6 month mark - Expression of Interest data being utilised and home assessments and DBS checks will be carried out so that alternative sponsor accommodation is available	4	4	16	- Approval to progress housing development schemes and reopening of the HRA. First 3 schemes now in development phases with options appraisals in place for further sites. - Transformation Board action plan in place for next 3-4 years to increase available housing supply with an overall initial target of 1000 additional affordable homes. - Continue to develop partnership working with private sector landlords to assist households to remain in private sector accommodation. - Work innovatively with a range of providers to increase access to a supply of affordable accommodation. - Continue to focus on early intervention and prevention of homelessness assessing trends in approaches to tackle main causes of homelessness. - Beehive acquisition schemes has secured 90 new units of accommodation with Executive approval to enter into an acquisition programme with Orchard and Shipman for c250 homes. 'Approval given to continue to operate the dedicated team for the next twelve months Deliver Incentive scheme for hosts prepared to extend sponsor placement Continue to extend and deliver range of floating support schemes Implement dedicated housing advice role to offer intensive support to families at risk of placement breakdown - 'Ongoing dialogue with sponsors to enable modelling of when placements may come to an end Implementing the re matching service	Director of Housing, Planning and Regeneration (Sara Bowrey)

Risk Assessment Guidance

Likelihood	Almost Certain (5)	5	10	15	20	25	15+	High Risk - review controls and actions every month
	Highly likely (4)	4	8	12	16	20	10 - 12	Significant Risk - review controls and actions every 3 months
	Likely (3)	3	6	9	12	15	5 - 9	Medium Risk - review controls and actions every 6 months
	Unlikely (2)	2	4	6	8	10	1 - 4	Low Risk - review controls and actions at least annually
	Remote (1)	1	2	3	4	5		
		Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)		
		Impact						

Risk Likelihood Key					
	Score - 1 Remote	Score - 2 Unlikely	Score - 3 Possible	Score - 4 Likely	Score - 5 Definite
Expected frequency	10 - yearly	3 - yearly	Annually	Quarterly	Monthly

Risk Impact Key					
Risk Impact	Score - 1 Insignificant	Score - 2 Minor	Score - 3 Moderate	Score - 4 Major	Score - 5 Catastrophic
Compliance & Regulation	Minor breach of internal regulations, not reportable	Minor breach of external regulations, not reportable	Breach of internal regulations leading to disciplinary action Breach of external regulations, reportable	Significant breach of external regulations leading to intervention or sanctions	Major breach leading to suspension or discontinuation of business and services
Financial	Less than £50,000	Between £50,000 and £100,000	Between £100,000 and £1,000,000	Between £1,000,000 and £5,000,000	More than £5,000,000
Service Delivery	Disruption to one service for a period of 1 week or less	Disruption to one service for a period of 2 weeks	Loss of one service for between 2-4 weeks	Loss of one or more services for a period of 1 month or more	Permanent cessation of service(s)
Reputation	Complaints from individuals / small groups of residents Low local coverage	Complaints from local stakeholders Adverse local media coverage	Broader based general dissatisfaction with the running of the council Adverse national media coverage	Significant adverse national media coverage Resignation of Director(s)	Persistent adverse national media coverage Resignation / removal of CEX / elected Member
Health & Safety	Minor incident resulting in little harm	Minor Injury to Council employee or someone in the Council's care	Serious Injury to Council employee or someone in the Council's care	Fatality to Council employee or someone in the Council's care	Multiple fatalities to Council employees or individuals in the Council's care