

Human Resources and Customer Services Risk Register - Appendix F

											DATE LAST REVIEWED:	03/11/2023	
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	Human Resources	Ability to respond to industrial action, changes in government initiatives or legal requirements.	Cause(s): - Changes to staff terms and conditions (localisation agenda) - Lack of flexibility of workforce - Poor horizon scanning and networking Effect(s): - 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	Failure to comply with HR related legislative requirements e.g. Equality Act 2010	Cause(s): - 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 Effect(s): - 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 accurate 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	1) Ineffective workforce planning initiatives including succession planning, talent management. 2) Upskilling of staff - lack of training resources/opportunities	Cause(s): - Insufficient strategic management control and planning - Staff turnover (capacity) - Lack of resources Effect(s): - 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	Ineffective recruitment and retention strategies for hard to fill posts	Cause(s): - 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 - Recruitment can fluctuate due to external pressures Effect(s): - Potential service delivery impacts - Increased costs due to use of agency workers - Reduction in quality of service	Personnel / Operational	3	4	12	1. Horizon scanning to anticipate changes and trends to complement staff 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 8. Overseas recruitment 9. Signed up to the London Pledge - all Councils have a memorandum or understanding to pay social workers same rate 10. LBB staff present at recruitment fairs/events 11. Recruitment event took place in January	3	3	9	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 for agency workers	<p>Cause(s):</p> <ul style="list-style-type: none"> - Poor procedures - Inadequate monitoring - Lack of awareness / understanding <p>Effect(s):</p> <ul style="list-style-type: none"> - Workers with safeguarding concerns not identified - Safeguarding incident occurs (harm / injury) - Agency worker ID fraud - Reputation damage - Legal compliance implications inc. fines and sanctions 	Personnel / Operational	4	3	12	<ol style="list-style-type: none"> 1. HR Business Services carry out checks for LBB workers & agencies to check agency workers. 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. 3. Up front audits with Adecco undertaken to ensure processes are robust for agency workers. 4. Training provided for managers. 5. Internal audit undertakes a review of arrangement as part of their annual audit plan. 	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>Cause(s):</p> <ul style="list-style-type: none"> - Lack of adequate financial resources - Lack of expertise - Unexpected delays - Changes in strategic direction - Lack of capacity to undertake in a timely manner - Conflicting priorities <p>Effect(s):</p> <ul style="list-style-type: none"> - New service models are ineffective / not fit for purpose - Increased costs - Legislative and legal requirements breached (e.g. TUPE) - Reduction in service quality / provision - Reputation damage 	Personnel / Operational	4	3	12	<ol style="list-style-type: none"> 1. Managing change procedure in place 2. Capacity building and additional resources to support the change process 3. Effective communication and engagement with staff and their representatives 4. Formal consultation processes and departmental representatives 5. Regularly meetings include Members 6. Terms of Reference for each workstream led by Chief Officers 	3	2	6	<ul style="list-style-type: none"> - One-off funding required to support transformation programmes and workstreams - Review HR Processes in light of new working arrangements 	Director of HR, Customer Services and Public Affairs
7	Human Resources	HR systems failures e.g. payroll, recruitment, HR self-service, pensions	<p>Cause(s):</p> <ul style="list-style-type: none"> - Contractual failure - IT failure - Loss of power - Data breach / Cyber attack - Ineffective business continuity plan for manual work around <p>Effect(s):</p> <ul style="list-style-type: none"> - Delays or restriction in level of HR support available - Staff not paid - Staff morale reduction if for a long period - Delays in ability to recruit - Failure to apply for jobs, employment/legal issues - Failure to comply with contractual obligations - Industrial action 	Data and Information	2	5	10	<ol style="list-style-type: none"> 1. Back-up payroll processes/systems 2. Regular saving of personnel information on Resource Link 3. Business Continuity Plan in place 4. Internal audit carry out reviews as part of annual review programme 5. Regular meetings with contractors and Business Continuity Plans for each contract 	4	2	8	None identified	Director of HR, Customer Services and Public Affairs

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8	Human Resources	Ineffective compliance with IR35	<p>Cause(s):</p> <ul style="list-style-type: none"> - 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 <p>Effect(s):</p> <ul style="list-style-type: none"> - Huge fine by IRS - Reputational damage - IRS investigation of the authority 	Financial / Legal	2	5	10	<ol style="list-style-type: none"> 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	<ul style="list-style-type: none"> - 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 and Safety	Staff not completing mandatory and/or required training	<p>Cause(s):</p> <ul style="list-style-type: none"> - Lack of staff capacity to complete training - Lack of knowledge of mandatory courses - Lack of monitoring of who has completed the courses <p>Effect (s):</p> <ul style="list-style-type: none"> - Potential accidents/fatalities if staff don't receive required training, which could mean potential prosecution of Council and / or civil claims for compensation should - Lack of competency in workforce 	Personnel / Operational & Health and Safety	4	3	12	<ol style="list-style-type: none"> 1. Reporting on who has completed Fire Prevention and Evacuation e-learning course regularly done 2. Reminder emails regularly sent about completing mandatory courses 3. Automatic reminders sent out to staff members by the Evolve system when staff members need to redo their fire prevention and evacuation e-learning course (it has to be done annually) 4. H&S training completion rates included in reporting to committees such as CLT and the Corporate Health and Safety Committee 	3	3	9	<ul style="list-style-type: none"> - Assistant Director for Human Resources drafting a report to COE on list of mandatory courses 	Director of HR, Customer Services and Public Affairs
10	Human Resources / Health & Safety	<p>Health & Safety (Council) Ineffective management, processes and systems across all Council departments. Including (but not limited to) in the following areas:</p> <ul style="list-style-type: none"> Lone working Violence & aggression at work Control of substances hazardous to health Incident reporting and recording Assessment of risks Display screen equipment (DSE) Manual handling Working at heights 	<p>Cause(s):</p> <ul style="list-style-type: none"> - Inadequate risk assessments - Outdated policies and processes - Poor use of data around 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 - Lack of competency across the workforce <p>Effect (s):</p> <ul style="list-style-type: none"> - 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	<ol style="list-style-type: none"> 1. Revised Corporate Health and Safety Policy published in June 2023. This outlines responsibilities for health and safety in the organisation, and the arrangements in place to ensure the safety and wellbeing of staff and others. 2. Health and safety policies reviewed and updated regularly - ongoing 3. Commitment to health and safety from Chief Executive and Directors 4. Health and safety training, including mandatory training, for staff and others 5. Corporate Health and Safety Committee and Departmental Safety Committees meet regularly 6. Quarterly health and safety updates provided to Corporate Leadership Team (CLT) 7. Risk assessments done on local and corporate levels 	3	3	9	<ul style="list-style-type: none"> - Continuation of risk assessing & proactive monitoring. - Informal H&S audits to be undertaken by Corporate Health and Safety. - Continue to revise policies which need to be updated including COSHH, working at heights, electrical safety, PPE, lone working, legionella management and asbestos. - Review the current incident reporting system in place, and see if an alternative can be implemented. 	Director of HR, Customer Services and Public Affairs

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11	Human Resources / Health & Safety	Failure to comply with H&S related legislative requirements e.g. Health and Safety at Work etc. Act 1974	Cause(s): - Lack of awareness with legislation - Failure to effectively consult staff where appropriate - Human error / lack of understanding - Lack of capacity and capability to deliver - Lack of competency across the workforce - Lack of resources Effect(s): - Reputation damage - Prosecution - Insurance claims - Financial costs - Regulatory inspection / intervention	Health & Safety/Legal	3	5	15	1. Policies reviewed and updated regularly - ongoing 2. Regular updates provided to Corporate Health and Safety Committee on changes to legislation 3. Information provided from enforcing bodies shared with colleagues 4. Any areas of non-compliance identified are reported to Director of Human Resources, Customer Services and Public Affairs 5. Holding the relevant colleagues to account for managing Council premises to required legal standards 6. Up to date Corporate Health and Safety Policy in place, which has been signed by the Chief Executive	3	3	9	- Ensure all staff do H&S training to ensure they are aware of their responsibilities. - Continue to share information about recent prosecutions in similar industries with staff members so lessons can be learnt by LBB.	Director of HR, Customer Services and Public Affairs
12	Health and Safety/Property	Insufficient fire safety arrangements Non compliance with Regulatory Reform (Fire Safety) Order 2005, as amended by the Fire Safety Act 2021	Cause(s) - No trained fire responsible person (legal) for some sites - Insufficient numbers of trained fire wardens and fire marshals onsite to safely manage an evacuation (in accordance with the Fire Risk Assessments). Cover has become even more stretched now that additional sites are operating simultaneously - Insufficient fire safety and fire fighting equipment - Property related issues, including property not being suitable for fire safety requirements - Insufficient arrangements for outside of normal working hours - Insufficient arrangements to support those who may need additional assistance evacuating in a fire - including the lack of undertaking of personal emergency evacuation plans - Fire risk assessments not undertaken - Insufficient arrangements for monitoring who is on site at any given time e.g. check in and check out arrangements - Lack of clarity on who is responsible for what should there be an emergency Effect(s) - Non compliance with the Regulatory Reform (Fire Safety) Order 2005, as amended by the Fire Safety Act 2021 - Inadequate plans for fire safety and evacuation for current occupation plans putting staff and visitors at risk	Health & Safety/Property	4	5	20	1. Reduced number of staff on site 2. Check in and check out arrangements adopted at the Civic Centre site 3. Fire evacuation instructions for the Civic Centre site published 4. All staff required to complete fire prevention and evacuation e-learning course 5. Currently trying to recruit more volunteers to be fire wardens 6. New monthly allowance provided to fire wardens to encourage more people to volunteer 7. Fire Safety is standing item at Corporate Health and Safety Committee 8. Fire Safety policy published 9. Arrangements for new accommodation implemented and are under constant review 10. Fire drills undertaken	3	5	15	- Learning and Development to arrange training. - Facilities Management to ensure Fire Risk Assessments are completed. - Facilities Management to engage fire safety supplier to produce Emergency Plans for sites. - Civic Centre Emergency Plan is to include the revised fire evacuation procedure which meets the best practice advice from the London Fire Brigade and HSE. - Facilities Management team to implement new signage etc. - Facilities Management team to distribute emergency plan to site occupiers and to arrange training on plan for fire marshals. - Fire safety documents to be stored corporately to retain corporate knowledge and ensure regularly reviewed. - Fire Safety to be added to COE agenda as a standing item. - Fire drills to be undertaken. - Alternatives to current Civic Centre check in and check out arrangements to be reviewed due to issues with current arrangements. - The creation of a Fire Safety Committee is to be considered. - A report regarding possible options for electric powered personal vehicles (EPPVs) to go to COE.	Director of HR, Customer Services and Public Affairs & Director of Housing, Planning and Regeneration

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13	Human Resources/Health and Safety	Insufficient first aid arrangements Non compliance with Health and Safety (First Aid) Regulations 1981	<p>Cause(s) - Insufficient first aid cover, for both inside and outside of normal office operating hours. Cover has become even more stretched now that additional sites are operating simultaneously - Delays in requested first aider training being delivered</p> <p>Effect(s) - Non compliance with the Health and Safety (First Aid) Regulations 1981</p>	Health & Safety	3	4	15	<p>1. Reduced number of staff on site</p> <p>2. Current Civic Centre first aiders list displayed on notice boards across the Civic Centre site and on the intranet. On the list, it encourages people to contact the Attendants Lodge who would know who the available first aiders are and make contact with them</p> <p>3. Two defibrillators located at Civic Centre site</p> <p>4. Further first aid training recently undertaken. Further dates are currently being arranged</p> <p>5. Further recruitment of first aiders being undertaken</p> <p>6. Increased monthly allowance provided to first aiders to encourage more people to volunteer</p>	3	3	9	- Review to be undertaken of sites which need defibrillators.	Director of HR, Customer Services and Public Affairs
14	Customer Services	Fall in income from Registrars Economic downturn and uncertainty regarding accommodation and other external factors contributing to a significant fall in income in Registrars e.g.loss of Old Palace as a venue option and transition to new building	<p>Cause(s): Uncertainty regarding accommodation Leaving Civic Centre for a less appealing venue</p> <p>Effect(s): Reduced level of bookings Financial impact</p>	Financial - Operational	3	3	9	<p>- Regular budget and activity monitoring</p> <p>- Targeted marketing of ceremonies, venues etc. to maximise income, website videos, use of social media</p> <p>- Flexible use of staff to maximise income in periods of high activity and reduce costs in quieter periods</p> <p>- Development of web based advertising for suppliers such as florists, photographers etc.</p>	3	2	6		Assistant Director of Customer Services
15	Customer Services	Contractor Failure	<p>Cause(s): Contractor (such as Liberata) cease trading due to financial or other failure.</p> <p>Effect(s): 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	<p>- Regular monitoring of performance and monthly operational meetings to identify any continued and ongoing reduction in service delivery</p> <p>- Core contract monitoring and overview of other elements of the contract to identify shortfalls in other areas of service delivery</p> <p>- Effective scrutiny of potential contractors</p> <p>- Appropriate performance bonds or parent company guarantees</p> <p>- Business continuity planning</p> <p>- Standardised contract letting procedures and documentation as contracts renew</p>	2	3	6	-Identify potential alternative contractors	Assistant Director of Customer Services
16	Customer Services	Contractor Performance	<p>Cause(s): Failure to effectively manage service delivery contracts provided such as Liberata</p> <p>Effect(s): Continued and ongoing poor performance and/or increased customer complaints.</p>	Contractual and Partnership - Operational	4	3	12	<p>- Daily, weekly, monthly and annual monitoring of performance and key performance indicators</p> <p>- Monthly operational meetings with contractor to discuss performance and monitor against balanced score card</p> <p>- Escalation through core contract route of any continued and ongoing shortfalls in performance</p>	2	2	4		Assistant Director of Customer Services

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17	Customer Services	Maintenance of Statutory and GRO standards	Cause(s): Increase in life events (births / deaths) within Bromley Staffing pressures Effect(s): Drop in standards leading to a potential breach of statutory duty and extended wait time to register	Legal - Operational	3	3	9	1. Regular monitoring of registration activity and timescales, close liaison with Medical Examiner and Bereavement/Maternity services 2. Use of casual staff to perform statutory registrations 3. Close monitoring of quality and performance from GRO system reporting 4. Annual report produced for GRO in May	1	3	3		Assistant Director of Customer Services
18	Customer Services	Loss of Facility Loss of customer service accommodation as a result of a major power failure or other incident that prevents access to the Civic Centre	Cause(s): Major power failure or other incident that prevents access to the Civic Centre Effect(s): Major disruption to council services	Data and Information - Operational	3	3	9	Business Continuity Plan regularly reviewed - Existing local resilience procedures (overflow to alternative Liberata Office) establish in a temporary alternative location Considered as part of the overall corporate business continuity plan options for temporary accommodation	2	2	4		Assistant Director of Customer Services
19	Customer Services	Safety of Statutory Records	Cause(s): Fire / flooding Strong room not GRO compliant Effect(s): Damage to or destruction of historic statutory registration records	Operational	3	3	9	Developer of new building advised of Strong Room specifications as directed by GRO, construction of new Strong Room to be completed and signed off by GRO prior to service move	1	3	3		Assistant Director of Customer Services