

## Housing, Planning and Regeneration Risk Register

R E M E M O I D	D I V I S I O N	R I S K T I T L E & D E S C R I P T I O N  (a line break - press shift & return - must be entered after the risk title)	R I S K C A U S E & E F F E C T	R I S K C A T E G O R Y	G R O S S R I S K R A T I N G  (See next tab for guidance)			E X I S T I N G C O N T R O L S I N P L A C E T O M I T I G A T E T H E R I S K	C U R R E N T R I S K R A T I N G  (See next tab for guidance)			F U R T H E R A C T I O N R E Q U I R E D	R I S K O W N E R
					L I K E L I H O O D	I M P A C T	R I S K R A T I N G		L I K E L I H O O D	I M P A C T	R I S K R A T I N G		
1	All	<b>Failure to deliver against Housing Financial Strategy</b>	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Demand led statutory services which can be difficult to predict</li> <li>- High number of households meeting criteria for temporary accommodation</li> <li>- Lack of suitable housing</li> <li>- Increased costs at 2 Traveller Sites for repairs and maintenance</li> <li>- Impact and inflation and increased demand on accommodation for temporary accommodation across London</li> <li>- Temporary accommodation not keeping pace with increasing costs of temporary accommodation</li> <li>- Increase number of households approaching</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Failure to achieve a balanced budget</li> </ul>	Financial	5	5	25	<ul style="list-style-type: none"> <li>- Match financial planning to Council priorities</li> <li>- Plans to deliver increased housing supply through increased acquisitions</li> <li>- Conditions attached to S106 to ensure it is spent on additional affordable housing provision to reduce the reliance on temporary accommodation</li> <li>- Budget monitoring and forecasting</li> <li>- Regular reporting to CLT and Members via the Committee reporting process</li> <li>- Internal audit framework</li> <li>- Regular review of strategies to prevent homelessness and identify/develop temporary accommodation housing</li> <li>- Determination at planning stage to ensure collection of obligations due (S106)</li> <li>- Conditions attached to S106 funding received to ensure it is spent on preventing homelessness</li> <li>- Constantly reviewing service operations for potential efficiencies</li> <li>- All relevant statutory strategies implemented</li> </ul>	4	5	20	<ul style="list-style-type: none"> <li>- Ensure the continued delivery of the housing schemes as set out in the Transformation Board Housing Plan</li> <li>- Complete the feasibility studies for the Phase 2 housing development sites</li> <li>- 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</li> </ul>	Director, Housing, Planning and Regeneration (Sara Bowrey)
2	Housing Needs	<b>Failure to deliver effective Housing Needs services</b> The Council is unable to deliver an effective Housing Needs service to fulfil its statutory obligations	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Very demand led</li> <li>- Difficulties in recruiting and retaining experienced staff</li> <li>- Homelessness approaches remain high but significant decreases in availability of accommodation and rising cost of accommodation.</li> <li>- Complexity of cases needing maximisation of early intervention</li> <li>- Lack of awareness of where households need to approach services</li> <li>- Lack of suitable housing options.</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Failure to fulfil statutory obligations</li> <li>- Impact on life chances and outcomes for individuals and families in need of Housing Services</li> <li>- Reputational damage</li> <li>- Legal challenge</li> <li>- Financial Impact</li> </ul>	Legal	4	4	16	<ul style="list-style-type: none"> <li>- The homelessness forum has been established and is taking forward the priorities of the homelessness strategy</li> <li>- Implementing the Homelessness Strategy - the multi-agency Homelessness Forum has been established and implemented and other priorities of the Strategy are being taken forward</li> <li>- Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money</li> <li>- Housing Transformation Board programme being implemented</li> <li>- Implementation of new Bromley owned Housing schemes as well as property purchasing schemes to increase the number of units of accommodation in order to reduce the reliance on nightly paid accommodation.</li> <li>- Provide a competitive private sector offer / - All relevant statutory strategies implemented</li> <li>- Ensuring grant funding is pursued and properly utilised.</li> <li>- 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.</li> </ul>	2	4	8	<ul style="list-style-type: none"> <li>- The majority of officers are now attending the office 2+ days per week.</li> <li>- Recruitment is progressing a number of posts have been recruited to. Training programmes and inductions in place to ensure that staff have the correct skill set.</li> </ul>	Assistant Director, Housing (Lynnette Chamielec)
3	Housing Needs	<b>Temporary Accommodation</b> Inability to effectively manage the volume of people presenting themselves as homeless and the additional pressures placed on the homeless budgets	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Changes in government funding</li> <li>- Rising numbers of placements (approx. 15 per month).</li> <li>- Lack of local affordable sustainable options</li> <li>- Rising energy and other costs households facing increasing risk of homelessness</li> <li>- Uncertainty around the impact of move on requirements for schemes such as Homes for Ukraine, Afghanistan resettlement programme</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Failure to fulfil statutory obligations</li> <li>- Impact on life chances and outcomes for individuals and families in temporary accommodation</li> <li>- Increased risk of legal challenge due to unsuitable accommodation and increased risk of Out of Borough Placements</li> <li>- Increased risk of legal challenge due to provision of unsuitable accommodation (including shared accommodation)</li> <li>- Pressure on other services</li> <li>- Increase in the number of out of borough placements</li> </ul>	Legal/Social	5	4	20	<ul style="list-style-type: none"> <li>- Focus on preventing homelessness and diversion to alternative housing options through:-</li> <li>- Landlord and Tenancy advice, support and sustainment</li> <li>- Assistance, (including financial aid) to access the private rented sector</li> <li>- Access to employment and training</li> <li>- Debt, money, budgeting and welfare benefits advice, including assistance to resolve rent and mortgage arrears</li> <li>- Sanctuary scheme for the protection of victims of domestic violence</li> <li>- Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money</li> <li>- Development of social housing on LBB sites and implementation of Meadowship Homes acquisition</li> <li>- Implementing the Homelessness Strategy - setting up the multi agency Homelessness forum and taking forward the priorities of the strategy</li> <li>- New incentive campaign for private sector landlords embedded and benefits being realised</li> </ul>	4	4	16	<ul style="list-style-type: none"> <li>- Phase 2 of Meadowship homes property acquisition now live. Approval to progress with a further 3 housing sites under the LBB affordable housing delivery programme</li> <li>- Ongoing conversion tenancies in the More Homes Bromley scheme from temporary to permanent.</li> <li>- Undertake rolling programme of SLA agreements and quality assurance programmes for TA to ensure that accommodation procured meets all required accommodation standards.</li> <li>- Review requirement for block bookings to ensure sufficient TA supply</li> <li>- Undertake a review of the support and incentives provided to increase access to PRS accommodation.</li> </ul>	Assistant Director, Housing (Lynnette Chamielec)
4	Housing Needs (Housing Strategy)	<b>Capital Grant</b> Failure to deliver the Council's affordable housing strategy in support of statutory obligations Lack of infrastructure in place where growth is occurring	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Lack of availability of external capital grant (Housing Associations) to deliver key housing schemes</li> <li>- 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</li> <li>- Potential fluctuations in house prices and supply chains</li> <li>- Schemes not granted planning permission to develop identified sites</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Failure to fulfil statutory obligations</li> <li>- 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.</li> </ul>	Social	4	4	16	<ul style="list-style-type: none"> <li>- 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</li> <li>- Work underway to streamline the S106 process to ensure that the Council maximises the use of available funding to meet housing needs</li> <li>- Determination at planning stage to ensure collection of obligations due</li> <li>- Conditions attached to funding received to ensure it is spent on preventing homelessness</li> <li>- Development group with Housing Associations established to improve relationships with planners and developers to increase supply of affordable housing</li> <li>- Bromley Federation of Housing Association Meetings are operational.</li> <li>- Working with the GLA to negotiate favourable grant levels to enable proposed affordable housing schemes to proceed</li> </ul>	3	4	12	<ul style="list-style-type: none"> <li>- Discussions held with individual registered providers.</li> <li>- Planning seeking to maximise affordable housing delivery through planning consents and S106 funding</li> <li>- Ongoing negotiations to maximise grant rates for affordable housing delivery</li> </ul>	Assistant Director, Housing (Lynnette Chamielec)
5	Housing, Planning and Regeneration	<b>Recruitment and Retention</b> Failure to recruit and retain key skilled staff with suitable experience/qualifications	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Failure to compete with other organisations to recruit the highest quality candidates to build an agile workforce</li> <li>- Small pool of experienced workers</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Failure to identify and meet service user needs</li> <li>- Provision of service to ineligible clients</li> <li>- Provision of service prior to/without appropriate authorisation</li> <li>- Lack of skill sets result in an inability to deliver effective housing services and planning services as well as progressing housing and regeneration schemes.</li> <li>- Impact on life chances and outcomes of families and young people.</li> </ul>	Personnel	5	4	20	<ul style="list-style-type: none"> <li>- Recruitment drive to convert locums to permanent staff</li> <li>- Council's recruitment web site includes a video virtual tour of the Council in housing</li> <li>- Support in effectively managing staff performance</li> <li>- Bespoke training for first line managers</li> <li>- Training and quality assurance of best practice</li> <li>- Role on Recruitment and Retention Board</li> <li>- Review the recruitment/retention of housing staff including packages for retaining staff</li> <li>- Developing apprenticeship and trainee roles in Planning Services</li> <li>- Grading and role responsibilities for key posts benchmarked</li> <li>- Promotion of employment prospects and career progression in Bromley enhanced</li> <li>- Working with specialist recruiters.</li> <li>- Salary benchmarking and key roles consideration</li> </ul>	2	4	8	<ul style="list-style-type: none"> <li>- Consideration to be given around succession planning across the department</li> <li>- Recruitment and retention package developed.</li> </ul>	Director, Housing, Planning and Regeneration (Sara Bowrey)  Supported by Director, Human Resources (Charles Obazuaye)
6	Housing, Planning and Regeneration	<b>Business Interruption / Emergency Planning</b> Failure to provide Council services or statutory requirements of mass illness/fatalities scenario following a business interruption or emergency planning event	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Business Interruption could be caused by Loss of Facility (fire, flood etc.), Staff (illness, strike) or IT (cyber attack).</li> <li>- 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)</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Business interruption - failure to deliver services, loss of customer / resident satisfaction.</li> <li>- Emergency planning - failure to deliver statutory duties.</li> </ul>	Personnel	2	5	10	<p><b>Business Interruption</b></p> <ul style="list-style-type: none"> <li>- Civil protection and emergency planning policies in place at corporate level overseen by the Corporate Risk Management Group</li> <li>- Business Continuity Plans in place at service level. Reviewed and updated.</li> <li>- Contracts contain business continuity provision</li> <li>- 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</li> </ul> <p><b>Emergency Planning</b></p> <ul style="list-style-type: none"> <li>- Robust plans in place, including Outbreak Plan, Flu Plan and Pandemic Flu Plan</li> <li>- Alert system via the South East London Health Protection Unit (SEL HPU)</li> <li>- Annual Flu vaccination programme in place</li> </ul>	1	5	5	<ul style="list-style-type: none"> <li>- Business Continuity Plans reviewed annually</li> <li>- Review business continuity plan with key partner agencies</li> <li>- Undertake business continuity plan stress test exercise</li> </ul>	Director, Housing, Planning and Regeneration (Sara Bowrey)
7	Housing, Planning and Regeneration	<b>Health &amp; Safety (Fire and First Aid)</b> Non compliance with legislation	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- No trained fire responsible person (legal) for some sites</li> <li>- Insufficient numbers of trained fire wardens working from the site to safely manage an evacuation (in accordance with the Fire Risk Assessments).</li> <li>- Insufficient fire safety and fire fighting equipment and insufficient first aid supplies</li> <li>- Property related issues</li> <li>- Insufficient numbers of trained first aiders working from site to ensure sufficient first aid cover</li> <li>- Insufficient arrangements for monitoring who is onsite at any given time</li> <li>- Fire risk assessments not undertaken</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Non compliance with legislation which could lead to legal and financial consequences</li> <li>- Inadequate plans for fire safety and evacuation</li> <li>- Non compliance with Health and Safety (First Aid) Regulations 1981 in terms of adequate first aid provision in the form of trained first aiders and appropriate equipment if employees are injured or become ill at work</li> </ul>	Legislative Reputational Legal Physical Personnel	5	5	25	<ul style="list-style-type: none"> <li>- Reduced number of staff on site</li> <li>- Check in and check out arrangements adopted at the Civic Centre site</li> <li>- New fire evacuation instructions for the Civic Centre site published</li> <li>- All staff required to complete fire prevention and evacuation e-learning course</li> <li>- Currently trying to recruit more volunteers to be fire wardens and first aiders</li> <li>- To encourage people to become fire wardens and first aiders, monthly allowance volunteers receive was increased</li> <li>- Fire Safety is standing item at Corporate Health and Safety Committee</li> <li>- New Fire Safety policy published</li> <li>- Arrangements for new accommodation implemented and under constant review</li> </ul>	3	5	15	<ul style="list-style-type: none"> <li>- Learning and Development arranging fire responsible person, fire warden and first aider training.</li> <li>- Facilities Management to ensure Fire Risk Assessments are completed.</li> <li>- Facilities Management to engage fire safety supplier to produce Emergency Plans. 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.</li> <li>- Facilities Management team to implement new signage etc.</li> <li>- Facilities Management team to distribute emergency plan to site occupiers and to arrange training on plan for fire marshals.</li> <li>- Fire drills to be undertaken.</li> <li>- Alternatives to current Civic Centre check in and check out arrangements to be reviewed due to issues with current arrangements.</li> <li>- Out of normal office hours arrangement to be reviewed.</li> </ul>	Director Housing, Planning and Regeneration (Sara Bowrey)  Supported by Director, Human Resources (Charles Obazuaye)

## Housing, Planning and Regeneration Risk Register

## Appendix D

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 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
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
n	Strategy, Performance and Corporate Transformation	<b>Data Collections</b> Failure to undertake statutory statistical data collections, including key housing and planning information, thereby adversely affecting government grant allocations and performance assessments	<b>Cause(s):</b> - Business Interruption - IT systems do not keep pace with legislative reporting requirements <b>Effect(s):</b> - 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 Chaudhry)
9	Strategic Property	<b>Financial Performance</b> Failure to reach expected income through rental income and property disposal	<b>Cause(s):</b> - 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 <b>Effect(s):</b> - 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 deferrals 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	- Continue 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 and further updates will follow.	Assistant Director, Strategic Property (Darren Essex)
10	Strategic Property	<b>Contractor Performance</b> Failure to deliver facilities management service	<b>Cause(s):</b> - Inadequate qualified staffing resources - Lack of capacity to deliver outcomes <b>Effect(s):</b> - 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 bc can be facilitated. - An Exec Committee report will go forwards in March 2024 on the re-tendering strategy for all FM contracts as those that are in place at present were short term solutions following the in sourcing 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 (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 (Darren Essex)
11	Strategic Property	<b>Capital Financing Shortfall</b> Risk of significant costs increase in the Capital Programme and possible reductions in proceeds from disposals could impact on the Council's ability to fully fund the Capital programme	<b>Cause(s):</b> - Property price reductions as a result of the economic environment could have a negative impact on sale proceeds. - Limited scope to identify further Council assets for disposal - Significant increase in cost of capital schemes due to inflation and supply issues requiring an increase in funding - Significant additional costs and future liabilities across the Council's operational estate arising from any further condition survey liabilities not identified at this stage. - Requirement to obtain funding for significant new Housing Schemes and impact of higher borrowing costs - In January 2023, a report titled Capital Strategy 2023-24 to 2026-27 and Q3 Capital Programme Monitoring to Executive identified a significant increase in the Council's capital programme and resulting funding proposals given the factors identified above there is a risk that significant changes in cost and proceeds could create a new capital financing shortfall that needs to be addressed. The full funding identified excludes the potential works relating to potential works on the Churchill Theatre and library with proposals expected to be reported to Members later this year. - Only limited earmarked reserves available to support the capital programme, once other pressures (inc revenue budget gap) are factored in. <b>Effect(s):</b> - Without alternative funding, the Council would require drawdown from revenue resources. - This would increase the Council's revenue budget gap. - Or many schemes would not progress due to lack of funding available although the scope to do this may be limited given the critical nature of some of the works required.	Financial	4	4	16	- Fundamental review of capital programme undertaken to inform updated Capital Strategy 2023/24 to 2026/27 as reported to Executive in January 2023 - this includes full capital programme, approved asset disposals, mitigations and agreed financing options. - Regular reporting to Members via SAG, FSG and Executive - Tight control and scrutiny [by finance] of capital spending commitments as they reach the level of business case. - Quarterly capital programme monitoring reports to Executive. - Current programme has now had funding agreed (ie Members have approved PWLB borrowing to refinance existing housing schemes (£50m via PWLB) and the additional option of up to £10m support from the Council's revenue earmarked reserves).	3	4	12	- Monitor capital programme costs, disposals sales prices and programme.	Assistant Director, Strategic Property (Darren Essex)
12	Strategic Property	<b>Operational Property Repair</b> The OPR Programme cannot be delivered to budget and within programme	<b>Cause(s):</b> - That building cost inflation and other economic uncertainties continue - The scope of works required exceeds the budget - The programme continues beyond the time anticipated - Resource to deliver the programme not available as anticipated <b>Effect(s):</b> - Not all works required can be implemented - Impacted properties may continue to have repair liabilities beyond those anticipated - Impacted properties may not be compliant for building regulations and health & safety - Works continue beyond the end of the anticipated programme	Financial	5	4	20	- Condition Surveys undertaken across all Workstreams - Original Cost estimates utilised cost per m2. Reviewed based upon Projects in or out of scope and QS assessment of Condition Surveys undertaken. - Executive Report on findings of the review and proposed capital works to repair the properties agreed at Full Council in Dec '22. Update tabled at COE in Dec 23. - Internal Resource increased by way of appointment of Capital Programme and Capital Works Managers. Also services from original consultant reviewed in terms of performance and scope.	4	3	12	- Monitor costs at Programme Board. Review of professional services required to deliver programme, leading to procurement of new multi disciplinary design lead services. Two Consultants to be appointed to manage workload. Tender due to be returned 15 Feb 24. Consultants to be appointed by 10 April 24. Master Programme drafted for discussion with Heads of Service.	Assistant Director, Strategic Property (Darren Essex)
13	Strategic Property	<b>Operational Property Repair</b> Buildings within the OPR Programme fail prior to commencement of works	<b>Cause(s):</b> - Infrastructure that is beyond economic repair fails <b>Effect:</b> - The property cannot be occupied - A Council service or stakeholder is unable to continue to offer a service from the property - There is a health & safety incident 5. The Council suffers financial and/or reputational loss	Financial	5	4	20	- OPR Team working closely with FM to identify any emergency works/repairs that need to be undertaken ahead of the OPR commencing. Engagement with FM through Sub Board and Programme Board meetings. Standard Agenda item to pick any FM related issues. Works on properties known to be at significant will be accelerated if the works are to be undertaken via OPR.	4	3	12	- Monitor Facilities Management reports of infrastructure failure. - FM to monitor/track OPR Programme and scope their FM Programme accordingly to ensure compliance. - Failure of building services to at any property to be reported to the FM property help desk by site. - FM property to engage supplier to attend promptly to investigate and remedy - Where Failure terminal and business critical to be reported to Assistant Director.	Assistant Director, Strategic Property (Darren Essex)
14	Culture and Regeneration	<b>Outreach Service</b> Failure to provide service in Cotmandene and Mottingham	<b>Cause(s):</b> - Buildings vulnerable to water and sewerage issues - Small staff base vulnerable to stress, lone working, and staff leaving - Change in locations and competing services <b>Effect(s):</b> - Failure to deliver full service - Closure of outreach centres - Impact on vulnerable adults - Lack of local users finding or using the service - Mottingham service halted during staff consultation due to lack of staff and low usage of service by local residents. Appointments still possible from Mottingham Library.	Social	4	4	16	- 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 and other Council services: Cotmandene collocated with St Paul's Cray Library permanently at refurbished site; Mottingham to be permanently relocated to Castlecombe site in 2024	3	4	12	- Progressing TUPE of staff to GLL and libraries contract variation to combine services - Continuing to support St Paul's Cray Library and Community Support Centre to operate as a co-located facility housing Library and Outreach Services	Assistant Director, Culture and Regeneration (Lydia Lee)

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					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
15	Culture and Regeneration	<b>Vitality and Prosperity of Town Centres</b> Failure of town centres to attract footfall and spend for retail and leisure opportunities	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- 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</li> <li>- 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.</li> <li>- Poor development in town centres / - Lack of investment in town centre facilities and public realm.</li> <li>- Impact of external factors on local economy</li> <li>- Supplier/contractor issues and increased contractor/supplier costs / - Planning applications refused</li> <li>- Lack of stakeholder interest and support for improvements / - General site constraints preventing progress/project delivery</li> <li>- Beckenham rebalot fails</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Reduction in town centre business occupancy and increase in vacancies</li> <li>- Loss of income from business rates and market charges, and reduction in income from parking charges</li> <li>- Poor public perception and negative publicity. / - Lack of private sector or inward investment.</li> <li>- Reduction in property value. / - Reduction in footfall and spend per head resulting in loss of business.</li> <li>- Delays delivering public realm improvements / - Public Realm Improvements projects have to be terminated</li> <li>- Potential costs to the Council to take on a town centre management service, and a lack of investment in the Town Centre</li> </ul>	Economic	4	4	16	<ul style="list-style-type: none"> <li>- Support to Business Improvement Districts through renewal or ballot processes.</li> <li>- Work in partnership with Business Improvement Districts to drive town centre activity that support business success and include programming and events in town centres.</li> <li>- Secure funding for and deliver public realm improvements in town centres</li> <li>- Work with developers to bring forward suitable development that supports the vitality of town centres</li> <li>- Secure developer contributions for the benefit of town centres.</li> <li>- Investigate options for Renewal opportunities in all town centres.</li> <li>- Prioritise investment in town centre leisure facilities.</li> <li>- Bromley Economic Partnership in place to identify issues affecting local economy</li> <li>- Terms of Reference to define relationship between the Business Improvement Districts have been created to better support the local economy.</li> </ul>	4	3	12	<ul style="list-style-type: none"> <li>- Work with businesses to investigate the viability of a Business Improvement Districts in relevant locations</li> <li>- Terms of Reference to define relationship between the Council and BIDs under regular review to ensure it remains relevant.</li> <li>- Work with developers to bring forward sensitive town centre development that also secures improved facilities for community services.</li> <li>- Finalise town centre public realm improvement schemes.</li> <li>- Night Time Enterprise Zone to encourage vibrancy in Bromley Town Centre after 6pm</li> <li>- Night Strategy for the borough to be developed by DEC24</li> </ul>	Assistant Director, Culture and Regeneration (Lydia Lee)
16	Culture and Regeneration	<b>Capital Schemes</b> Failure to deliver housing schemes	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Failure to gain approval from Members for business cases on use of land for housing</li> <li>- Failure to secure funding for schemes</li> <li>- Failure to deliver housing schemes on time and in budget</li> <li>- Issues with land ownership and usage</li> <li>- Planning permission not granted or granted with conditions which impact adversely on costs</li> <li>- Inflation and construction costs</li> <li>- Lack of interest from market in developing sites</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Failure to provide number of accommodation units identified</li> <li>- Failure to produced identified savings as part of Housing Transformation Board programme</li> <li>- Impact on vulnerable families and children</li> <li>- Tenants remain in TA for long periods of time</li> <li>- Increased revenue pressures on TA</li> </ul>	Financial/Social	5	5	25	<ul style="list-style-type: none"> <li>- The York Rise development is under construction</li> <li>- The West Wickham development is under construction</li> <li>- Additional resources in Regeneration and Renewals teams dedicated to assess and bring forward a range of housing sites across the borough.</li> <li>- Crystal Palace Regeneration strategy grant funding secured and consultancy team appointed. RIBA 2 due to complete September 23.</li> <li>- Regular liaison with GLA to negotiate grant rates which reflect increase costs due to inflation</li> <li>- Securing fix price tenders for housing delivery.</li> <li>- Bromley North submitted to Planning April 23, anticipated DCC 5/10/23. £720k secured from BLRF2 to support site preparation for this scheme.</li> </ul>	4	4	16	<ul style="list-style-type: none"> <li>- Further conversations required to be developed with services to understand short and longer term requirements of particular sites</li> <li>- Legal advice sought on ownership and usage issues and actions identified.</li> <li>- Coordination across disposals programme to ensure revenue and housing targets can be met jointly.</li> <li>- Leadership team working with GLA on Crystal Palace.</li> <li>- Further upskilling and knowledge sharing across teams to bring forward development effectively.</li> </ul>	Assistant Director, Culture and Regeneration (Lydia Lee)
17	Culture and Regeneration	<b>Leisure Centres</b> Failure to facilitate and enable the provision of leisure centre services	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Service provider ceases to trade due to financial difficulties</li> <li>- Facilities have to close due to plant failure or other serious building maintenance issues</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Temporary cessation of leisure facilities in the borough</li> <li>- Adverse public response</li> <li>- Social impact on vulnerable adults and families along with the wider population using leisure facilities and activities for health and wellbeing benefits</li> </ul>	Legal Reputational Social	4	4	16	<ul style="list-style-type: none"> <li>- Alliance Leisure contracted to undertake feasibility works for Walnut and West Wickham sites. proposals due to Executive in October 23.</li> <li>- Draft leisure strategy and facility planning works complete.</li> <li>- Playing pitch review complete.</li> <li>- Proactive Bromley established.</li> </ul>	3	3	9	<ul style="list-style-type: none"> <li>- Continue regular informal contact with MyTime in addition to formal meetings and provide support to resolve issues as necessary.</li> <li>- Leisure strategy and associated documents completed.</li> </ul>	Assistant Director, Culture and Regeneration (Lydia Lee)
18	Culture and Regeneration	<b>Library Service</b> Failure to provide statutory library service	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Service provider ceases to trade due to financial difficulties</li> <li>- Council terminates contract because service provider fails to consistently meet KPIs</li> <li>- Service does not meet contracted levels because of industrial action</li> <li>- Ongoing projects affecting permanent library buildings causing relocations and changes to available services</li> <li>- Library building projects causing temporary closures or interruptions to regular service</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Temporary cessation of library service in borough</li> <li>- Adverse public response</li> <li>- Possible impact on partners in shared use buildings</li> <li>- Social impact on vulnerable adults and families using library facilities and activities</li> </ul>	Legal Reputational Social	4	4	16	<ul style="list-style-type: none"> <li>- Ongoing monitoring of service provider to identify potential financial difficulties</li> <li>- KPIs monitored regularly: twice yearly reports to Members and monthly/annual review meetings with service provider.</li> <li>- Exit plan in place to manage any closure of contracted service and bring service in-house which is regularly reviewed and updated.</li> <li>- 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</li> <li>- Increased provision of activities and events for all age groups</li> <li>- Promotion of e-books, newspapers and magazines</li> <li>- Ongoing contact between Service Provider and LBB project teams where ongoing redevelopment projects interferes with usual library operations</li> </ul>	4	3	12	<ul style="list-style-type: none"> <li>- Continue regular informal contact with contractor in addition to formal meetings and provide support to resolve issues as necessary</li> <li>- Inclusion of service provider in regular project meetings and updating on timescales</li> <li>- Repair programme for library buildings to commence</li> <li>- Churchill Theatre/Central Library move to TopShop project to come on board following public announcement</li> <li>- Particular focus in 2024 to review performance of Bromley Historic Collections including partnership with Earth Museum and resources needed to support Archive service projects with LBB</li> </ul>	Assistant Director, Culture and Regeneration (Lydia Lee)
19	Planning	<b>Planning Service</b> Failure to deliver statutory requirements related to planning	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Failure of Planning IT service</li> <li>- Lack of suitably qualified staff to provide expertise within the service</li> <li>- Risk of bribery identified through internal audit</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- 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</li> <li>- Failure to prevent unauthorised development</li> <li>- Failure to respond to planning applications within statutory timescales</li> <li>- Planning decisions overturned on appeal</li> <li>- Failure to enforce Tree Protection Orders, protect listed buildings and conservation areas</li> <li>- Adverse public response</li> <li>- Reputational damage to the council</li> </ul>	Legal Financial Reputational	3	4	12	<ul style="list-style-type: none"> <li>- Planning software upgraded annually and maintained by software developer.</li> <li>- Review of case management software underway with target date of May 2024 for completion of replacement</li> <li>- Staffing levels and skill set appropriate for current levels of demand</li> <li>- Planning Advisory Service (PAS) review of service in June 2019 resulted in an improvement plan which has been delivered to Members</li> <li>- Appeals reviewed and learning implemented.</li> <li>- Planning Advisory Service (PAS) returned to review improvement plan and committees in July 2021 and further recommendations and actions are being pursued.</li> <li>- Existing checking and sign off process in place</li> <li>- Bribery training carried out</li> <li>- Officers required to declare any interest</li> </ul>	2	3	6	<ul style="list-style-type: none"> <li>- Implementation of new Planning IT system</li> <li>- Ongoing monitoring of work volumes to ensure staffing levels are sufficient for work levels</li> </ul>	Assistant Director, Planning (Tim Horsman)
20	Planning	<b>Community Infrastructure Levy</b> Failure to collect and spend local CIL and use for local infrastructure	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Failure to collect the local CIL</li> <li>- Failure to use local CIL appropriately</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Lack of funding for infrastructure to support new developments</li> <li>- Lack of funding to provide Infrastructure Delivery Team</li> </ul>	Legal Financial	2	3	6	<ul style="list-style-type: none"> <li>- Local CIL has been adopted and commenced in June 2021</li> <li>- Experienced Infrastructure Delivery Scheme Manager in post to ensure successful adoption of agreed local CIL</li> </ul>	2	3	6	<ul style="list-style-type: none"> <li>- Monitor current impact of inflation on the number of developments coming forward</li> </ul>	Assistant Director, Planning (Tim Horsman)
21	Planning	<b>Section 106 Agreements</b> Failure to complete S106 agreements for affordable housing	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Lack of appropriately qualified staff to ensure S106 agreements are implemented as appropriate</li> <li>- Lack of S106 Monitoring Officer in post</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Impact on level of supporting infrastructure in borough</li> <li>- S106 monies not being spent on appropriate infrastructure and housing schemes</li> </ul>	Financial	3	3	9	<ul style="list-style-type: none"> <li>- Officer group in place to monitor and maximise s106 spend</li> <li>- Infrastructure Delivery Team Leader in post acting as s106 monitoring officer and overseeing s106 agreements including financial receipts and payments</li> </ul>	1	1	1	<ul style="list-style-type: none"> <li>- 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.</li> </ul>	Assistant Director, Planning (Tim Horsman)
22	Planning	<b>London Plan</b> Failure to deliver level of housing in Bromley contained in Mayor of London's plan	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Mayor of London's Plan requires greater levels of housing to be built in Bromley than in Local Plan</li> <li>- Planning permission for sufficient level of development not granted</li> <li>- Landbanking by developers resulting in targets of new houses not being met in a timely fashion</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Bromley penalised at planning appeal stage</li> </ul>	Reputational Financial	5	3	15	<ul style="list-style-type: none"> <li>- Local Plan policies being reviewed to identify suitable sites</li> <li>- Planning and Regeneration teams are seeking to promote appropriate housing development in the Borough</li> </ul>	3	3	9	<ul style="list-style-type: none"> <li>- Local Plan review has commenced</li> </ul>	Assistant Director, Planning (Tim Horsman)

REF	DIVISION	RISK TITLE & DESCRIPTION <small>(a line break - press shift &amp; return - must be entered after the risk title)</small>	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING <small>(See next tab for guidance)</small>			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING <small>(See next tab for guidance)</small>			FURTHER ACTION REQUIRED	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
23	Compliance & Strategy	<p><b>Homes for Ukraine and other Refugee programmes</b> 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</p>	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Volume of refugees arriving increasing</li> <li>- Breakdown in relationship between sponsor and guest</li> <li>- Accommodation coming to an end at the pre-agreed period with no alternatives readily available, other than temporary accommodation or foster care</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Failure to fulfill statutory obligations</li> <li>- Impact on life chances and outcomes for individuals and families in temporary accommodation, particularly given the vulnerability of the refugees</li> <li>- Increased risk of legal challenge due to provision of unsuitable accommodation (including shared accommodation)</li> <li>- Pressure on Childrens Social Care if the sponsor placement fails and a Foster Placement is required</li> <li>- Impact on available accommodation to meet other statutory duties.</li> </ul>	Housing Social	5	4	20	<ul style="list-style-type: none"> <li>- Focus on preventing homelessness and diversion to alternative housing options through:-</li> <li>- Landlord and Tenancy advice, support and sustainment</li> <li>- Assistance, (including financial aid) to access the private rented sector</li> <li>- Access to employment and training</li> <li>- Debt, money, budgeting and welfare benefits advice, including assistance to resolve rent and mortgage arrears</li> <li>- Sanctuary scheme for the protection of victims of domestic violence</li> <li>- Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money</li> <li>- Implementation of the More Homes Bromley initiative to ensure the supply reduces the reliance on nightly paid accommodation</li> <li>- Implementing the Homelessness Strategy - setting up the multi agency Homelessness forum and taking forward the priorities of the strategy</li> <li>- New incentive campaign for private sector landlords embedded and benefits being realised</li> <li>- Modelling taking place to forecast how many households may need accommodation around the 6 month mark</li> <li>- Expression of Interest data being utilised and home assessments and DBS checks will be carried out so that alternative sponsor accommodation is available</li> </ul>	4	4	16	<ul style="list-style-type: none"> <li>- 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.</li> <li>- 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.</li> <li>- Continue to develop partnership working with private sector landlords to assist households to remain in private sector accommodation.</li> <li>- Work innovatively with a range of providers to increase access to a supply of affordable accommodation.</li> <li>- Continue to focus on early intervention and prevention of homelessness assessing trends in approaches to tackle main causes of homelessness.</li> <li>- 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.</li> <li>- Approval given to continue to operate the dedicated team for the next twelve months.</li> <li>- Deliver incentive scheme for hosts prepared to extend sponsor placement.</li> <li>- Continue to extend and deliver range of floating support schemes.</li> <li>- Implement dedicated housing advice role(s) in place to provide intensive support to families at risk of placement breakdown/move on.</li> <li>- Ongoing dialogue with sponsors to enable modelling of when placements may come to an end. / - Implementing the re matching service.</li> </ul>	Director of Housing, Planning and Regeneration (Sara Bowrey)

## Risk Assessment Guidance

Likelihood	Almost Certain (5)	5	10	15	20	25	<table border="1" style="margin: 0 auto;"> <tr><td style="background-color: red;">15+</td></tr> <tr><td style="background-color: orange;">10 - 12</td></tr> <tr><td style="background-color: yellow;">5 - 9</td></tr> <tr><td style="background-color: cyan;">1 - 4</td></tr> </table>	15+	10 - 12	5 - 9	1 - 4	<p><b>High Risk</b> - review controls and actions every month</p> <p><b>Significant Risk</b> - review controls and actions every 3 months</p> <p><b>Medium Risk</b> - review controls and actions every 6 months</p> <p><b>Low Risk</b> - review controls and actions at least annually</p>
	15+											
	10 - 12											
	5 - 9											
	1 - 4											
Highly likely (4)	4	8	12	16	20							
Likely (3)	3	6	9	12	15							
Unlikely (2)	2	4	6	8	10							
Remote (1)	1	2	3	4	5							
	Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)	Impact						

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

Risk Impact Key					
Risk Impact	Score - 1	Score - 2	Score - 3	Score - 4	Score - 5
	Insignificant	Minor	Moderate	Major	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