

NBBC Strategic Risk Register

Current Version: 30th September 2020

Risk Level Indicator Matrix and Descriptors

Key

Green	Green (acceptable)
Amber	Amber (tolerable)
Red	Red (unacceptable)

Likelihood

4	4	8	12	16
3	3	6	9	12
2	2	4	6	8
1	1	2	3	4
	1	2	3	4

Impact

Likelihood

- 4: **Very High** – occurrence is most likely or has already happened and will do so again if control measures are not introduced
- 3: **High** – occurrence is anticipated within the next 12 months
- 2: **Significant** – occurrence is probable in the next 3 years
- 1: **Low** – foreseeable, but not probable in the next 3 years

	Level of Impact	Service Delivery	Financial / Legal	Reputation / Community
4	Major	<ul style="list-style-type: none"> • A service delivery failure causes significant hardship to people for a period of 3 to 4 weeks or more or 1 week for anyone that is vulnerable, or failure to meet a nationally mandated deadline • Loss of major stakeholder/partner. • Adverse outcome of a serious regulatory enquiry 	<ul style="list-style-type: none"> • Financial loss over £400,000 • Serious risk of legal challenge 	<ul style="list-style-type: none"> • Sustained adverse TV/radio coverage • Borough wide loss of public confidence • Major damage to local environment, health and economy • Multiple loss of life
3	Serious	<ul style="list-style-type: none"> • A service delivery failure causes significant hardship for a period of 2 to 3 weeks or 3 to 7 calendar days for vulnerable people • Formal regulatory inquiry • Loss of a key partner or other partners 	<ul style="list-style-type: none"> • Financial loss between £200K and £399K • High risk of successful legal challenge 	<ul style="list-style-type: none"> • Significant adverse coverage in national press or equivalent low national TV coverage • Serious damage to local environment, health and economy • Extensive or multiple injuries &/or a fatality
2	Moderate	<ul style="list-style-type: none"> • A service delivery failure causes significant hardship for 1 to 2 weeks or 1-2 calendar days for vulnerable people • Loss of a significant non-key partner • Legal concerns raised • Loss of employees has moderate effect on service provision 	<ul style="list-style-type: none"> • Financial loss between £50K and £199K • Informal regulatory enquiry 	<ul style="list-style-type: none"> • Significant adverse coverage in local press or regional TV • Large number of customer complaints • Moderate damage to local environment, health and economy • Moderate injuries to an individual
1	Low	<ul style="list-style-type: none"> • Disruption to services for up to 1 week • Minor legal implications • Loss of employees not significantly affecting service provision 	<ul style="list-style-type: none"> • Financial loss up to £49K 	<ul style="list-style-type: none"> • Minor adverse media coverage • Minor environmental, health and economy damage • Minor increase in number of customer complaints • One or more minor injuries to an individual

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
R1	<p>Potential failure to provide adequate accommodation to meet the needs of the borough with consequent impact on the lives of residents</p> <p>NOTE: See also R20, Pandemic – services, social and economic implications</p>	Very High / Major (RED)	<p>1. Housing / Homelessness Strategy.</p> <p>2. Corporate Strategic Housing Group (CSHG) - comprising Housing, Legal, Planning & Finance officers.</p> <p>3. Warwickshire Heads of Housing Group (WHOH).</p>	Strategic Housing Manager (unless stated)	Very High / Serious (RED)	<p>1. Housing Needs Survey (2010), Strategic Housing Market Assessment (2013), Housing Options data.</p> <p>2. CSHG minutes.</p> <p>1&2: Sustainable 30 Year Business Plan</p> <p>3. Minutes of WHOH meetings.</p>	Director (R&H)

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			<p>4. Affordable Housing Supplementary Planning Document (Borough Plan).</p> <p>5. Implementation plan relating to the Homelessness Reduction Act.</p> <p>6. Housing Revenue Account Development and Acquisition Strategy.</p> <p>7. Investment Partner status with Homes England.</p> <p>8. Development Team for HRA new builds.</p> <p>9. Funds identified for HRA Business Plan for acquisitions and new builds.</p>	5 – 9: Director (R&H)		<p>4. Document in place.</p> <p>5– 7. Documents / minutes of meetings</p> <p>8. Management Team minutes</p> <p>9.HRA Business Plan</p>	

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			<p>10. Nominations agreements with registered providers.</p> <p>Planned:</p> <p>1. HRA / GF development programme.</p> <p>2. Consultation on Town Centres Area action plan (development plan document).</p> <p>3. Review of Borough Plan</p>	<p>10. Strategic Housing Services Manager</p> <p>1: Head of Development / Head of Regeneration and Estates Property Services</p> <p>2: Director (D, P & PP)</p> <p>3: Director (D, P & PP)</p>		<p>10. Agreement records.</p> <p>1. Programmes in place.</p> <p>2. Document in place.</p> <p>3. Publication of revised plan.</p>	

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R3	<p>A major NBBC contractor or supplier cannot deliver a service as planned or ceases trading / failure to comply with requirements for procuring goods and services</p> <p>NOTE: See also risk R19 (disruption ensuing from Brexit process) and R20, Pandemic – services, social and economic implications</p>	Significant / Major (AMBER)	<p>1. Legally binding contract documentation.</p> <p>2. Contract monitoring activities.</p> <p>3. Procurement process that is in place and regularly reviewed as defined by contract procedure rules. On-going supplier monitoring including credit check via Corporate Governance Group (CGG).</p> <p>4. On-going financial check (key contracts).</p>	<p>1. Strategic Creditors and Procurement Manager</p> <p>2: Respective Directors</p> <p>3&4: Strategic Creditors and Procurement Manager on behalf of Executive Director (Resources)</p>	Low / Major (GREEN)	<p>1. Tender documents, contract conditions and legal documentation.</p> <p>2. Minutes of meetings with contractors.</p> <p>3. Latest version of Contract Procedure Rules.</p> <p>4. Records of processed invoices.</p>	Executive Directors on behalf of Management Team

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			5. In-house Corporate Governance training.	5&6: Audit & Governance Manager		5. Records of in-house governance training.	
			6. Internal audit.			6. Internal Audit reports.	
			7. External legal advice.	7: Legal services Manager		7. Records of legal advice.	
			8. Designated Strategic Procurement Team.	8: Executive Director (Resources)		8. Team in place / training and contract support records.	
			9. Pay suppliers promptly to aid cash flow.	9: Executive Director (Resources)		9. Regular payments performance reports.	
			10. Consideration of provision of service by NABCEL.	10: Executive Director (Resources), Director (R&H)		10. Business Cases / Cabinet reports.	

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			<p>11. Contractors required to provide Parent Company Guarantee &/or performance bond, as required.</p> <p>12. Assisting contractors with cash flow.</p> <p>13. Additional payments to assist contractors.</p>	<p>11: Executive Director (Resources)</p> <p>12: Relevant Director in conjunction with Creditors and Procurement Manager and Executive Director (Resources)</p> <p>13: Relevant Director in conjunction with Creditors and Procurement Manager and Executive Director (Resources)</p>		<p>11.Tender documents, contract conditions and legal documentation</p> <p>12. Payments made.</p> <p>13. Payments made.</p>	

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			<p>14. Compliance with Cabinet Office Public Procurement Policy Notes (PPNs).</p> <p><u>Planned:</u></p> <p>1. Review of Contract Procedure Rules.</p> <p>2. Review and complete formal signing of the Leisure Management Contract, in line with changes to contract period.</p>	<p>14: Creditors and Procurement Manager</p> <p>1: Executive Director (Resources) / Audit and Governance Manager</p> <p>2: Executive Director (Operations) / Directors (D, P & PP and LR & H))</p>		<p>14. Creditors and Procurement records.</p> <p>1. Updated procedure rules.</p> <p>2. Signed legal contract in place.</p>	

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			3. Monitor and review the Covid-19 pandemic situation and operational recovery for leisure contract and future financial impact on the existing contract.	3: Executive Directors / Director (LR &H)		3. Interim agreements signed off with contractor until March 2021 / Leisure contract management fee re-negotiated from April 1 st , 2021 onwards.	

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R4	<p>Failure to maintain the economic vibrancy of the borough / town centres</p> <p>NOTE: See also R20, Pandemic – services, social and economic implications</p>	Very High / Major (RED)	<p>1. Non-constituent member of West Midlands Combined Authority (WMCA)</p> <p>2. Member of Coventry & Warwickshire Local Enterprise Partnership (CWLEP).</p> <p>3. Cross Border Delivery Partnership.</p> <p>4. Economic Development Strategy.</p> <p>5. Partnership working with Chamber of Commerce and Federation of Small Businesses (FSB) and others.</p>	<p>1,2,6,8,10: Executive Director (Operations)</p> <p>3,4,5, 7: Director (R&H)</p>	Very High / Major (RED)	<p>1,2,6. Minutes of WMCA meetings</p> <p>3, 4, 5. Minutes of meetings of CWLEP and Joint Committee</p> <p>3. Minutes of meetings of the partnership</p> <p>4. Cabinet report</p> <p>5. Minutes of partner meetings, FSB awards</p> <p>1 – 5. Papers relating to Economic Growth Programme Board</p>	Executive Directors on behalf of Management Team

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			6. Maintain "Invest Warwickshire" – website for available commercial property.			6. Website in place	
			7. Business Rates Local Discount scheme.	7: Director (R & H)		7. Policy in place	
			8. Residential development commenced at Church Street Nuneaton completed August 2020.	8: Head of Regeneration and Estates / Head of Town Centres and Marketing		8. Development in progress	
			9. Think Local First supporting local businesses.	9: Director (R&H)		9. Corporate Governance Group report	
			10. WMCA employment support pilot in Camp Hill.	10: Head of Communities / Economic Development Officer		10. Support in place	
			11. Transforming Nuneaton master plan.	11: Head of Regeneration and Estates		11. Plan in place	

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			12. Employment land allocations in borough Plan.	12: Head of Planning		12. Borough Plan in place.	
			13. Bid to Government's "Future High Streets" fund.	13: Management Team		13. Bid submitted.	
			14. Letting and further development of former Co-Op building.	14: Executive Directors		14. Site development.	
			15. Delivery of Transforming Nuneaton master plan including spend against CWLEP and "One Public Estate" grants.	15: Head of Regeneration and Estates		15. Programme Board minutes.	
			16. Prepare Towns Fund bid to Government	16: Director (R &H)		16. Bid submitted.	

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			<p>17. Bedworth visioning document completed and Transforming Bedworth Group established.</p> <p>18. Procured regeneration partner for Abbey Street, Nuneaton.</p> <p>19. Appointed additional staff capacity for Nuneaton.</p> <p>20. Delivery of Government Coronavirus Business Grants</p> <p>21. Delivery of Government funded Discretionary grants to small businesses</p>	<p>17: Town Centres and Marketing Manager</p> <p>18: Head of Regeneration and Estates</p> <p>19. Director (R &H)</p> <p>20 & 21: Director (R&H)</p>		<p>17. Records in place.</p> <p>18. Procurement and other programme management documentation</p> <p>19. Staff in post / induction records.</p> <p>20.Payment records on Civica system.</p> <p>21. Applications and payment records on Civica.</p>	

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			<p>22. Warwickshire Town Centres Strategic Task Force (set up due to Covid-19 pandemic)</p> <p><u>Planned:</u></p> <p>1. Development of Business Improvement District (BID) proposal.</p> <p>2. Consultation on Town Centres Area action plan.</p> <p>3. Leisure Strategy and parks concept plans.</p> <p>4. Abbey Street development - to Cabinet for approval October 2020 (Planning application December 2020).</p>	<p>22: Head of Town Centres and Marketing</p> <p>1. Head of Town Centres and Marketing</p> <p>2: Head of Planning, Development Control</p> <p>3: Director (L, H &R)</p> <p>4: Head of Regeneration and Estates</p>		<p>22. Meeting minutes / outcomes correspondence.</p> <p>1. Study in place.</p> <p>2. Cabinet progress reports.</p> <p>3. Strategy and plans in place / Cabinet progress reports.</p> <p>4. Cabinet / Planning Committee minutes.</p>	

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R5	Failure to reduce the fear of crime and disorder.	High /- Serious (RED)	<p>1. Nuneaton and Bedworth Safer Communities Partnership (NABSCOP). Meets monthly. Action points identified & regularly reviewed. Has own Risk Register.</p> <p>2. Police & Crime Commissioner (PCC) grants</p> <p>3. Annual strategic assessment of crime, the level of crime & its impact on the community.</p> <p>4. Corporate Community safety Group.</p> <p>5. Anti-Social Behaviour & Harassment Policy / Anti-Social Behaviour Strategy 2019-21.</p>	1-6: Communities Manager.	Sig / Moderate (GREEN)	<p>1 & 3. Minutes of NABSCOP meetings, including crime performance statistics. External OSP reports.</p> <p>2. Financial accounts (PCC grant receipt and usage). External OSP reports.</p> <p>4. Minutes of Corporate Community safety Group</p> <p>5. Relevant case management records in Flare system / ASB Case Management Group minutes.</p>	Director (R&H)

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			<p>6. Communities Officer (anti-social behaviour).</p> <p>7. CCTV coverage.</p> <p>8. Replacement of DPPPOs with Public Space Protection Orders.</p> <p><u>Planned:</u></p>	<p>7: Executive Director (Resources) and Director (R&H)</p> <p>8: Director (R&H)</p>		<p>6. Officer in place.</p> <p>7.CCTV records / British Standard BS7958 Certification / Police Tasking Group minutes.</p> <p>8. Minutes of internal meetings.</p>	

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R6	<p>Arson or an accidental fire in NBBC corporate buildings, General Purpose flats and Independent Living Complexes</p> <p>NOTE: Single council housing incidents do not constitute a strategic risk.</p>	Significant / Major (AMBER)	<p>1. Fire Management Group (FMG).</p> <p>2. Regularly serviced fire detection & alarm systems / fire extinguishers and appropriate Fire Risk Assessments (FRA) regularly reviewed.</p> <p>3. Quarterly Health & Safety inspections give attention to fire risks.</p> <p>4. Annual Capital Fire Safety Work Programme in Housing Revenue account stock.</p>	<p>1: Director (D, P & PP)</p> <p>2: Plant Maintenance / Energy Officer, Director (D, P & PP), Head of Health and Safety and Asbestos</p> <p>3: Respective Directors.</p> <p>4: Housing Property Services Manager</p>	Low / Major (GREEN)	<p>1. FMG meeting minutes.</p> <p>2. Service records, Fire extinguisher service records & records of FRA outcomes. External report (review of arrangements).</p> <p>3. Quarterly Health & Safety inspection records.</p> <p>4. Cabinet reports and Capital Projects Meeting Minutes.</p>	Executive Directors on behalf of Management Team

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			<p>5. Business Continuity Plans.</p> <p>6. Existing insurance policy documents.</p> <p>7. Liaison with Warwickshire Fire and Rescue Service Fire Prevention Team.</p> <p>8. External Wall Insulation specification reviewed.</p> <p>9. Internal audit of fire risk arrangements (completion by December 2020).</p>	<p>5: Respective Directors.</p> <p>6: Audit and Governance Manager</p> <p>7: Head of Health and Safety and Asbestos</p> <p>8: Director (R&H)</p> <p>9: Head of Health and Safety and Asbestos</p>		<p>5. Business Continuity Plan documents in place.</p> <p>6. Policy documents in place.</p> <p>7. E-mail records and meeting minutes / outcomes.</p> <p>8. Property records.</p> <p>9. Internal Audit report.</p>	

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			<p>10. Maglock doors fitted to communal areas of Independent Living Complexes.</p> <p>11. Certified fire doors – Ministry of Housing Communities and Local Government (MHCLG).</p> <p><u>Planned:</u></p> <p>1. On-going review of corporate assets.</p> <p>2. Implement Internal Audit report action plan.</p> <p>3. Review of evacuation policy in complexes in progress.</p>	<p>10: Director (R&H)</p> <p>11: Property Services Manager</p> <p>1. Management Team</p> <p>2. Head of Health and Safety and Asbestos</p> <p>3 and 4. Director (R&H)</p>		<p>10. Doors in place.</p> <p>11. Certification in place.</p>	

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			<p>4. Act on appropriate recommendations arising from public enquiries (i.e. Grenfell Tower).</p> <p>5. Review of fire arrangements in Independent Living and General-Purpose flats</p> <p>6. Corporate review of Health and Safety arrangements.</p>	<p>5. Director – (R&H) / Director – (D, P & PP)</p> <p>6. Director – (D, P & PP)</p>		<p>5. Report in place.</p> <p>6. Report in place.</p>	

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R7	<p>Breakdown of Council services due to an emergency or significant incident.</p> <p>NOTE: See also R20, Pandemic – services, social and economic implications</p>	Low/Major (AMBER)	<p>1. Corporate Business Continuity Plan.</p> <p>2. Each Directorate has an effective Business Continuity Plan (BCP).</p> <p>3. Two separate server rooms in different towns connected by high-speed links.</p> <p>4. Emergency Plan including regular training.</p> <p>5. Re-configuration of the 2nd internet connection at Bedworth to takeover if the Nuneaton internet connection is down</p>	<p>1: Executive Directors</p> <p>2 & 3: Directors.</p> <p>3: Director (CS&BI).</p> <p>4: Executive Directors.</p> <p>5: Director (CS&BI).</p>	Low/ Serious (GREEN)	<p>1. Plan in place.</p> <p>2: Plans in place.</p> <p>3: Maintained by IT / Maintenance Contracts.</p> <p>4: Plan in place.</p> <p>5. In place.</p>	Executive Directors and Director (CS&BI)

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			<p>6. Shared service Emergency Planning Officer in place.</p> <p><u>Planned:</u></p> <p>1. Update Business Continuity Plans.</p> <p>2. Explore options to resolve power outages.</p> <p>3. Explore options to have active / active mirroring of the services at Nuneaton and Bedworth.</p> <p>4. Update Emergency Plan.</p>	<p>6: Director (CS&BI).</p> <p>1: Directors</p> <p>2&3: Director (CS&BI)</p> <p>4: Director (CS&BI) and Joint Emergency Planning Officer (shared service)</p>		<p>6. Joint Emergency Planning Officer (JEPO) two-year work streams plan.</p>	

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R8	Failure to deliver / refresh the key elements of "Delivering Our Future (DOF) 2019 – 31.	High / Moderate (AMBER)	<p>1. Member training programme.</p> <p>2. Annual Development Reviews.</p> <p>3. Management Development training.</p> <p>4. Performance management framework.</p> <p>5. DOF Delivery Plan.</p> <p>6. Monitor and utilise external funding opportunities.</p>	<p>1: Executive Directors</p> <p>2: Directors</p> <p>3.: Director (CS&BI)</p> <p>4: Audit and Governance Manager</p> <p>5 - 7: Management Team</p>	Very High / Moderate (AMBER)	<p>1, 2 & 3. Records of all formal Employee & Member meetings and training.</p> <p>4 & 5. Strategic Performance Report (monthly to management / quarterly to Cabinet / Overview and Scrutiny Panels).</p> <p>6. Capital Programme and Revenue Budgets.</p>	Executive Directors on behalf of Management Team

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			<p>7. Partnership working arrangements.</p> <p><u>Planned:</u></p> <p>1. On-going annual review of DOF delivery plan.</p> <p>2. Reassessment of action timescales due to implications of the Covid-19 pandemic.</p>	<p>1: Audit and Governance Manager</p> <p>2. Management Team</p>		<p>7. Partnership board meeting minutes.</p> <p>1. Current plan in place</p> <p>2. Management Team minutes / updated delivery plan.</p>	

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R9	<p>Failure to effectively manage Health, Safety & welfare arrangements to limit the potential for accidents and financial penalties</p> <p>NOTE: See also R20, Pandemic – services, social and economic implications</p>	High / Major (RED)	<p>1. Health and Safety Co-ordinators Group (HASCOG).</p> <p>2. Health & Safety policies & procedures.</p> <p>3. Risk assessments and safe systems of work.</p> <p>4. Mandatory Health & Safety training.</p> <p>5. Designated Corporate Health and Safety Team.</p> <p>6. Fire Safety Management Group (FMG).</p>	<p>1, 5, 6 & 7: Director (D, P & PP),</p> <p>2, 4 & 8: Head of Health and Safety and Asbestos</p> <p>3: Directors</p>	Significant / Major (AMBER)	<p>1, 2, 3. HASCOG minutes.</p> <p>4. Training Records</p> <p>5. Team in place.</p> <p>6. FMG Meeting minutes.</p>	Director (D, P & PP)

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			<p>7. Asbestos Management Group (AMG).</p> <p>8. New compliance software system (NSHARE) in place.</p> <p><u>Planned:</u></p> <p>1. Implement actions from Internal Audit report.</p> <p>2. Fully implement new compliance software system (NSHARE).</p> <p>3. Corporate review of Health and Safety arrangements.</p> <p>4. Develop effective reporting and assurance for Management Team.</p>	<p>1&2: Head of Health and Safety and Asbestos</p> <p>3&4: Director – (D, P & PP)</p>		<p>7. AMG meeting minutes.</p> <p>1. FMG Meeting minutes.</p> <p>2. I.T. system fully implemented.</p> <p>3. Report in place and recommendations implemented.</p> <p>4. Management Team reports and minutes.</p>	

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
R10	Failure to effectively manage the Council's finances	V. High / Serious (RED)	<p>1. Regular monitoring of budgets including Cabinet reporting.</p> <p>2. Adequate level of reserves held to manage fluctuations. Section 151 assurance statement on budget proposals.</p> <p>3. Nuneaton and Bedworth Community Enterprises Ltd (NABCEL).</p>	Management Team (all)	Low / Moderate (GREEN)	<p>1 & 6. Strategic Performance Management Report to Management Team / Cabinet / Full Council / Corporate Governance Group.</p> <p>2. Earmarked reserves maintained and kept under review / S151 Officer's annual Assurance Statement on reserves.</p> <p>3. NABCEL meeting minutes.</p>	Executive Directors / Section 151 Officer – Executive Director (Resources)

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
			<p>4. Housing Revenue Account Business Plan.</p> <p>5. Updated Medium-Term Financial Plan.</p> <p>6. Strategic Risk Register maintenance and review.</p> <p>7. Financial and HRA risk assessments.</p> <p>8. Effective / robust internal and external audit.</p> <p>9. Quarterly reporting to Audit and Standards Committee.</p> <p>10. Financial and contract procedure rules.</p>			<p>4. Internal / External audit / annual Cabinet report.</p> <p>4 / 5. Cabinet / Full Council minutes.</p> <p>6. Document controlled Strategic Risk Register.</p> <p>7. HRA Business Plan and budget reports.</p> <p>8. Audit reports.</p> <p>9. Audit and Standards Committee reports.</p> <p>10. Internal / External audit reports.</p>	

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
			<p>11. The Executive Director (Resources) is the President of the Society of District Treasurers and, through this role, has close liaison with various Government Departments in relation to future local government financial matters.</p> <p><u>Planned:</u></p> <p>1. Refresher budget holder training.</p>	<p>11: Executive Director (Resources)</p> <p>1. Head of Financial Services</p>		<p>11. Meeting minutes.</p> <p>1. Training records.</p>	

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
R11	Nuneaton and Bedworth Community Enterprises Ltd. (NABCEL) gives rise to unplanned liabilities	Significant / Serious (AMBER)	<p>1. NABCEL Board.</p> <p>2. Articles of Association adopted.</p> <p>3. Each new business activity for NABCEL is supported by a robust business case that must be approved by both the Council and the NABCEL Board.</p> <p>4. Appropriate and effective policies and procedures are in place and budgets are monitored regularly.</p> <p>5. Appropriate insurance cover in place.</p>	Head of Financial Services (unless otherwise stated)	Low / Moderate (GREEN)	<p>1. Board meeting papers & minutes.</p> <p>2. Articles of association</p> <p>3. Business cases / Cabinet minutes.</p> <p>4. Policies located in records management system and budget monitoring.</p> <p>5. Insurance certification.</p>	Executive Director (Operations) on behalf of Management Team

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
			<p>6. External accounting support.</p> <p>7. Internal Audit.</p> <p>8. Shareholder agreement / committee.</p> <p>9. Shareholder board member training.</p> <p>10. Fixed term Managing Director in place.</p> <p>11. Three-year Business Strategy.</p> <p>12. Five-year Business Plan.</p>			<p>6. External Account reports.</p> <p>7. Internal Audit reports.</p> <p>8. Shareholder agreement record / minutes of Shareholder Committee meetings.</p> <p>9. Training records.</p> <p>10. Contract of employment and work plan.</p> <p>11. Strategy in place.</p> <p>12. Business Plan in place.</p>	

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
			<p><u>Planned:</u></p> <p>1. Annual review of Business Strategy and Business plan.</p>	1. NABCEL Managing Director		1. Updated Strategy and Plan in place.	

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
R12	<p>Safeguarding children and adults with care and support needs from abuse, neglect and harm</p> <p>NOTE: See also R20, Pandemic – services, social and economic implications</p>	Significant / Serious (AMBER)	<p>1. Safeguarding Policy and Guidance.</p> <p>2. Corporate safeguarding lead officer and single point of contact for Warwickshire Multi Agency Safeguarding Hub (MASH)</p> <p>3. NBBC Recruitment & selection procedure.</p> <p>4. Disclosure & Barring Service policy and checks (DBS).</p> <p>5. MASH) and Adult Social Care (ASC).</p>	<p>Audit and Governance Manager (unless stated).</p> <p>3: Director (CS &BI).</p>	Low / Serious (GREEN)	<p>1. Policy in place and raining records.</p> <p>2. Job description and person specification.</p> <p>3. Recruitment records.</p> <p>4. DBS check records.</p> <p>5. NBBC Website, safeguarding page.</p>	Executive Director (Resources)

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
			<p>6. Safeguarding refresher training (every 3 years).</p> <p>7. Warwickshire Safeguarding Board best practice guidelines.</p> <p>8. Warwickshire Housing safeguarding lead officer.</p> <p>9. Multi Agency Protection Authority (MAPA)</p> <p><u>Planned:</u></p>	<p>8. Strategic Housing Services Manager.</p> <p>9: Director (R&H)</p>		<p>6. Training records (“DELTA”).</p> <p>7. Minutes of meetings (quarterly)</p> <p>8. Correspondence / meeting minutes.</p> <p>9. Minutes of meetings.</p>	

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
R14	Inadequate information management resulting in penalties applied by the Information Commissioner's Office / Non-compliance with General Data Protection Regulations (GDPR)	Very High/ Major (RED)	<p>1. Corporate Information Governance Group (CIGG) / Information Management Group.</p> <p>2. Use of an accredited contractor to dispose of electrical equipment (including IT equipment). The contractor guarantees data destruction & provides certification accordingly.</p> <p>3. Compliance with Public Services Network Code of Connection (PSN Co-Co).</p> <p>4. Senior Information Risk Owner (SIRO) and Deputy appointed.</p>	<p>1: Audit & Governance Manager</p> <p>2: Director (CS&BI).</p> <p>3: Director (CS&BI).</p> <p>4: Executive Director (Resources).</p>	Significant / Major (AMBER)	<p>1 and 2. Contractor agreement and meeting minutes</p> <p>3. Annual PSN Compliance Certification / "Cyber Essentials Scheme" certification (see also risk R16)</p> <p>4. SIRO's Job Description</p>	Executive Director (Resources)

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
			<p>5. Information Governance Framework/ ICT Code of Conduct for Employees/Member Protocol for the Use of IT Resources.</p> <p>6. Appointment of Data Protection Officer (DPO) in line with Data Protection regulations.</p> <p>7. Data Protection action plan.</p> <p>8. Data audit and publication of privacy notices.</p> <p>9. External Audit undertaken (Information Security Advice Limited).</p>	<p>5: Audit and Governance Manager).</p> <p>6: Audit and Governance Manager.</p> <p>7: DPO.</p> <p>8: Audit and Governance Manager.</p> <p>9: Audit and Governance Manager.</p>		<p>5. Individual Cabinet Member Decision</p> <p>6. DPO in place.</p> <p>7. Highlight reports to CIGG.</p> <p>8. Audit records (records of processing activity)/notices on council website.</p> <p>9. Report in place.</p>	

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			<p><u>Planned:</u></p> <p>1. Data Protection policy to be updated</p> <p>2. Data Protection training available on Delta to be reviewed to ensure that it is up to date and appropriate</p> <p>3. Data Protection information to be made available to employees via the new Intranet</p> <p>4. Data breach monitoring report to be developed and monitored by the IMG</p> <p>5. Information asset register to be reviewed annually</p>	<p>1. DPO</p> <p>2: DPO and Training Officer</p> <p>3: DPO</p> <p>4. Audit and Governance Manager and DPO</p> <p>5. Information asset owners</p>		<p>1. Policy approved.</p> <p>2. Delta training records.</p> <p>3. Intranet</p> <p>4. Monitoring report</p> <p>5 Asset registers</p>	

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R15	<p>Insufficient planning or resourcing of capital investment priorities</p> <p>NOTE: See also R4 (failure to maintain economic vibrancy of the borough / town centres)</p>	Significant / Serious (AMBER)	<p>1. Corporate Asset Management Team (CAMT)).</p> <p>2. Regular monitoring of capital projects.</p> <p>3. Asset Management Plan & Capital Strategy (5 years).</p> <p>4. Capital Programme Management meetings.</p> <p>5. Housing Revenue account (HRA) Business Plan (subject to regular review).</p>	<p>1: Executive Director (Operations)</p> <p>2: Executive Director (Resources), supported by CAMT.</p> <p>3: Executive Director (Operations).</p> <p>4 & 5: Director (R&H).</p>	Low / Moderate (GREEN)	<p>1. Minutes of CAMT meeting.</p> <p>2 & 5. Capital Programme Management meetings / Budget reports to management.</p> <p>3, 6 & 10. Cabinet reports.</p> <p>4. CAMT (reports to & minutes of meetings).</p> <p>5. Plan in place.</p>	Executive Directors and Director (R&H).

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
			6. Medium Term Financial Plan.	6: Executive Director (Resources)		6. Plan in place.	
			7. Acquisitions and Disposal Programme.	7: Director (R&H))		7. Programme in place.	
			8. Internal audit programme.	8: Audit and Governance Manager		8. Audit reports.	
			9. Treasury Management Strategy and Prudential Indicators.	9 & 10: Executive Director (Resources)		9. Strategy in place / Council minutes.	
			10. Half yearly reports to Cabinet on Capital programme.			10. Cabinet reports.	
			11. WMCA funding for land remediation.	11. Head of Regeneration and Estates		11. Funding received.	

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			<p>12. On-going funding bids via external bodies.</p> <p><u>Planned:</u></p> <p>1. Revised HRA Asset Management Plan.</p> <p>2. Review and update Capital Strategy.</p> <p>3. Funding bids to “Future High Streets” and “Town Centres” funds</p>	<p>12: Director (R&H)</p> <p>1: Property Services Manager</p> <p>2: Executive Director (Resources)</p> <p>3: Executive Directors</p>		<p>12. Bid documentation in place.</p> <p>1. Plan in place.</p> <p>2. Document in place and adopted.</p> <p>3. Bid documentation.</p>	

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
R16	"Cyber" crime or attack	High/ Major (RED)	<ol style="list-style-type: none"> 1. Public Services Network (PSN) annual compliance certification. 2. Anti-virus, managed firewall, security patches and robust back-up procedure updated weekly. 3. Awareness training sessions held throughout the year (linked to "Nexus Comply" module). 4. Monthly e-communication from Cyber Crime Officer (WCC). 	<p>1: ICT Client Manager</p> <p>2: ICT Client Manager</p> <p>3, 4 & 5: Director (CS&BI)</p>	Low / Major (AMBER)	<p>1 & 2. PSN certification in place</p> <p>3. Training programme and attendance records.</p> <p>4. Monthly e-communication.</p>	Director (CS& BI)

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
			<p><u>Planned:</u></p> <p>1. "Cyber Essentials" certification to be reinstated in conjunction with the new Housing computer package.</p>	<p>1. ICT Client Manager</p>		<p>1. Certificate in place.</p>	

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
R19	Disruption ensuing from "Brexit" process	Very High/ Major (RED)	<p>1. "Brexit" preparedness action plan.</p> <p>2. Local Resilience Forum (LRF).</p> <p>3. Regular updates to Senior Managers.</p> <p>4. Brexit support and advice for local businesses.</p> <p>5. Liaison with suppliers in relation to their resilience.</p> <p>6. Regional information briefing network.</p>	<p>1: Management Team</p> <p>2: Director (CS&BI)</p> <p>3: Director (D, P & PP)</p> <p>4: Director (R&H)</p> <p>5. Relevant Directors</p> <p>6: Executive Directors.</p>	Very High/ Moderate (AMBER)	<p>1. Action plan in Council's Records Management system.</p> <p>2. Minutes of LRF meetings.</p> <p>3. E-mail records.</p> <p>4. NBBC website.</p> <p>5. Supplier correspondence.</p> <p>6. Correspondence / minutes.</p>	Executive Directors on behalf of Management Team

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
			7. Brexit lead officer appointed.	7: Director (CS &BI)		7. Officer in place.	
			8. Communities information support on settled status.	8: Communities Manager		8. Event records.	
			9. Staff trained on settled status.	9: Communities Manager		9. Training records.	
			10. LA Preparation Brexit Fund - £50,000 to assist with helping business and others prepare for Brexit	10. Executive Director (Resources)		10. Budget records.	

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
			<p><u>Planned:</u></p> <p>1. Discussions with the Growth Hub, CWLEP, Federation of Small Business (FSB) and Coventry and Warwickshire Chamber of Commerce (CWCC) to identify all business issues and support mechanisms.</p>	1: Economic Development Manager		1. Minutes of meetings and appropriate action plans.	

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R20	Pandemic – service, social and economic implications	Very High/ Major (RED)	<p>1. Corporate Business Continuity Plan.</p> <p>2. Each Directorate has an effective Business Continuity Plan (BCP).</p> <p>3. Emergency Plan including regular training.</p> <p>4. Risk assessment in place to address and co-ordinate the safe delivery of (revised) services / working arrangements.</p> <p>5. Support for vulnerable groups in the community:</p>	<p>1: Executive Directors</p> <p>2: Executive Directors / Directors.</p> <p>3: Director (CS&BI).</p> <p>4. Head of Health and Safety</p> <p>5 - 8: Executive Directors.</p>	Very High/ Major (RED)	<p>1. Plan in place.</p> <p>2: Plans in place.</p> <p>3. Plan in place / training records.</p> <p>4. Risk assessment in place.</p> <p>5 & 6. Terms of reference / meeting minutes:</p>	Executive Directors on behalf of Management Team

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
			<ul style="list-style-type: none"> • Warwickshire Recovery Advisory Group [WRAG] • Warwickshire Recovery Advisory [RCG] • West Midlands [including Warwickshire] Recovery Advisory Group [RCG] <p>6. Support for local businesses in the community.</p> <ul style="list-style-type: none"> • Warwickshire Recovery Advisory Group [WRAG] 			<p>Chief Executives and Council Leaders from WCC and Districts & Boroughs.</p> <p>Chief Executives from WCC and Districts & Boroughs.</p> <p>Chief Executives from Constituent / Non-Constituent LA members of WMCA ad also senior “blue light” officers</p> <p>Chief Executives and Council Leaders from WCC and Districts & Boroughs.</p>	

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
			<ul style="list-style-type: none"> • Warwickshire Recovery Advisory [RCG] • West Midlands [including Warwickshire] Recovery Advisory Group [RCG] <p>7. Implement directives from Central Government, as required.</p> <p>8. Effective and timely communication systems (employees, Elected Members, public and media).</p>			<p>Chief Executives from WCC and Districts & Boroughs.</p> <p>Chief Executives from Constituent / Non-Constituent LA members of WMCA ad also senior “blue light” officers</p> <p>7. Regular completion of pro forma returns to Government.</p> <p>8. E-mail and public / media communications / bulletins.</p>	

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			<u>Planned:</u> 1. Update Emergency / Business Continuity Plans.	1. Executive Directors / Directors		1. Plans in place.	

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R21	Noncompliance with s10(1) of the Freedom of Information Act 2000 – Failure to respond within the prescribed time limit	Very high/Mode rate (AMBER)	<ol style="list-style-type: none"> 1. Monthly FOI reports to senior managers 2. Dash Customer Service Workflow application used to manage outstanding cases 3. Email alerts on receipt of new requests 4. Nominated officers in some service areas to monitor outstanding requests 5. External Audit undertaken (Information Security Advice Limited). 	<ol style="list-style-type: none"> 1: Senior Managers 2: Director (CS&BI) 3: Director (CS&BI) 4: Executive Directors/ Directors 5: Audit and Governance Manager. 	Very high/Mode rate (AMBER)	<ol style="list-style-type: none"> 1. Reports 2. Dash application 3. Emails 4. Nominated Officers 5. Report in place. 	

<u>Risk Ref</u>	<u>Risk Description</u>	<u>Gross Risk</u>	<u>Mitigation Control Existing / Ongoing</u>	<u>Mitigation Owner</u>	<u>Net Risk / STATUS</u>	<u>Sources of Assurance</u>	<u>Risk Owner</u>
			<p><u>Planned</u></p> <ol style="list-style-type: none"> 1. All aged outstanding requests to be reviewed 2. Workflow process to be reviewed and updated if necessary 3. Targeted training on meeting FOI request deadlines 4. Consider feasibility of having a dedicated employee to monitor and manage FOI requests 	<p>1-3: Information Management Group (IMG)</p> <p>4: Management team</p>		<ol style="list-style-type: none"> 1. Outstanding request reports 2. Outstanding request reports 3. Training records 4. Outstanding request reports 	