

Appendix A: Bristol City Council - Corporate Risk Register Report as at June 2018

Corporate Risk Register as at June 2018 - Risks to the achievement of Bristol City Councils Objectives.								
Risk title and description	What we have done	Performance	Current Risk Level			Tolerance Risk Level		
			Likelihood	Impact	Risk Rating	Likelihood	Impact	Risk Rating
<p>CRR13: Financial Framework and MTFP.</p> <p>Failure to reasonably estimate and agree the financial 'envelope' available, both annually and in the medium-term and the council is unable to set a balanced budget.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> Inadequate budgeting & budgetary control/Financial Settlements & wider fiscal policy changes: <ul style="list-style-type: none"> The potential for new funding formulas such as fair funding, business rates retention, new national funding formula for schools and High Needs to significantly reduce the government funding available to the council alongside possible increase in demand for council services. Political failure to facilitate the setting of a lawful budget. Unable to agree a deliverable programme of propositions that enable the required savings to be achieved. Insufficient reserves to mitigate risks and liabilities and provide resilience. Rising inflation could lead to increased costs. Economic uncertainty impact on locally generated revenues - business rates and housing growth, impacting on council tax, new homes bonus and business rate income. Brexit - the general uncertainty affecting the financial markets, levels of trade & investment. Judicial review. 	<p>BCC manages its financial risks through a range of controls including budget preparation, budget setting and a Budget Accountability Framework. Roles and responsibilities for managing, monitoring and forecasting income and expenditure against approved budgets have been updated.</p> <p>The council has developed a strong rolling Medium-term financial planning process to enable the strategic objectives and statutory duties are met. We are working to ensure a rigorous structure exists to oversee the budgetary control process from budget setting through to monitoring, oversight and scrutiny including:</p> <ul style="list-style-type: none"> The level of reserves and balances are regularly reviewed to ensure that account is taken of any financial risk. Financial Regulations and Financial Scheme of Delegation is in place. Regular in-year monitoring and reporting, review of future financial plans and assessment of financial risks and reserves are undertaken to ensure the financial plans are delivered. 2018/19 Budget and Capital Programme agreed by Full Council in February 2018 with agreed savings programme and outline capital programme to 2023. Medium Term Financial Strategy agreed by Cabinet in July 2017 and refreshed annually detailing savings, growth, and risks. The Mid-Year Treasury Report for 2017/18 presented to Audit Committee and Full Council in accordance with the Council's Treasury Management Process. Challenge meetings to challenge 2018/23 budget process are ongoing. The ongoing production of a programme of propositions that exceed the forecasted budget gap to provide members with options and headroom for variations in financial estimates. Changes to propositions are maintained in the DWG Tracker. The ongoing agreement of initial budget, proposals and key assumptions by Corporate Leadership Board and Executive and submission to scrutiny. The ongoing assessment of the adequacy of general reserves and any specific reserve which takes into account an assessment of the risks related to the budget estimates and financial/economic climate. The maintaining of the evolving financial model that reflects in a timely manner changes in national and local assumptions. 	↑	2	5	10	1	7	7
Risk Owner: S151 Officer and Director of Finance.	Action Owner: Section 151 Officer, Acting Executive Director Resources and Acting Director of Finance.	Portfolio Flag: Finance, Governance and Performance.			Strategy Theme: Our Organisation.			

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<p>CRR14: Information Governance.</p> <p>Introduction of the General Data Protection Regulations (GDPR).</p> <p>If the City Council fails to prepare for successful implementation of the General Data Protection Regulations (GDPR) then it may fail to fully comply with its statutory requirements.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • Failure to adequately plan for the implementation of the GDPR being introduced in May 2018. • Failure to invest in the required systems, equipment and posts required to implement these regulations. • Failure to adequately train staff in the requirements of the regulations. • Lack of resource (capacity or expertise) to manage Subject Access Requests. 	<p>A project team was put in place November 2017 and a plan developed around the Information Commissioners Office (ICO) 12 step plan January 2018. A 'Senior Information Risk Owner' was appointed (SIRO) February 2018 and Project Manager in November 2017, funding for additional Project Resource was approved by Statutory and Policy Board, April 2018. An informed Health Check with a supporting action plan was put in place February 2018 refocussing the project on essential elements of compliance for 25 May 2018. An Assurance Group is in place to support the SIRO and will continue to meet to manage and monitor the plan. The Extended Director Management Team has been briefed and weekly progress updates provided.</p> <p>The Data Protection/ Data Retention Policies have been updated and Data Protection (DP) guidance has been revised. The Data Protection Officer is in post and the Statutory Data Protection Officer has been appointed Q4. 2017/18. We have reviewed and implemented the Privacy Impact Assessment process and updated data sharing agreements with external partners and written to 1,200 highest risk suppliers to advise changes to contract.</p> <p>A Data Protection Audit of Personal Data held has been carried out and the Record of Processing Activities (ROPA's) completed.</p> <p>Interim improvements have been made to the Subject access request process to centralise the receipt of requests. The anticipated increase in requests has not yet materialised and improvements have been made to the way Data breaches are reported.</p> <p>Support has been provided to schools including a brief, guidance and templates and access to a data protection lawyer. Assurance that GDPR companies and schools are compliant was reviewed in Q4. 2018 and is ongoing. Members have been briefed and template ROPA's and Privacy Notices provided in Q4. 2017/18.</p> <p>A staff E-Learning package was launched and 99.9% of staff completed this. A training package was also been launched for staff who do not have access to ICT systems. New notices have been made available on the council web site detailing how we use personal data in a more transparent manner.</p> <p>Communication has been via the Source with council wide GDPR Communication in May 2018 as well as the ask GDPR mailbox, twice weekly drop-in sessions and the intranet - Source page has been updated with guidance, templates and examples for GDPR actions.</p> <p>There is regular reporting to the Cabinet Member for Finance, Governance and Performance, Deputy Mayor Cllr. Cheney, on progress against GDPR plan with updates provided to the Audit Committee quarterly.</p>	<p>↑</p>	2	5	10	2	3	6
Risk Owner: Senior Information Risk Owner (SIRO).	Action Owner: Senior Information Risk Owner (SIRO) and GDPR Project Manager.	Portfolio Flag: Finance, Governance and Performance.	Strategy Theme: Our Organisation.					

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<p>CRR15: Financial Deficit.</p> <p>The council's financial position goes into significant deficit in the current year resulting in reserves (actual or projected) being less than the minimum specified by the council's reserves policy.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • A failure to appropriately plan and deliver savings unscheduled loss of material income streams. • Increase in demography, demand and costs for key council services. • The inability to generate the minimum anticipated level of capital receipts. • Insufficient reserves to facilitate short term mitigations, risks and liabilities. • Interest rate volatility impacting on the council's debt costs. 	<p>BCC's Financial framework ensures that we have in place sound arrangements for financial planning, management, monitoring and reporting. New spend decisions and borrowing is only supported where the source of revenue resources to meet the costs is clearly identified and availability confirmed by Finance. Getting our accounts produced on time and without audit qualification is important to ensure that we can properly account for the resources we have used during the year.</p> <p>Corporate Revenue Monitoring Reports with identified risks are reported to Cabinet, overspending departments prepare action plans with responsible Directors identified.</p> <p>The ongoing review and due diligence of all budget savings by Delivery working Group and Delivery Executive, Corporate Leadership Board and the Executive. The pipeline of propositions to be incorporated into the DWG tracker, due diligence undertaken and subject to DWG/DE governance and assurance process.</p> <p>The ongoing regular monitoring reports to Corporate Leadership Team and Cabinet management reports setting out progress on delivery of savings and other risks and opportunities in addition to the forecast expenditure.</p> <p>We have continual oversight and ongoing management of the council's financial risks.</p> <p>Internal audit also undertakes a number of reviews of our financial planning and monitoring arrangements.</p>	↔	2	5	10	<p>A review of robustness of forecasting in light of YTD run rates and other associated evidence.</p> <p>Budget Improvement – The executive will review service recovery/delivery plans, options for mitigation and their viability, risk and priority outcome implications - both immediate and the wider MTFP impact.</p> <p>Where viable in year recovery/delivery plans cannot be achieved, Strategic Directors will report to the Mayor and Cabinet seeking a supplementary funding approval in accordance with the council's delegated executive approval powers (up to £1,000,000 for an area of activity).</p> <p>Where viable in year recovery/delivery plans cannot be achieved, Strategic Directors will report to prepared for Full Council (in accordance with the Budget & Policy framework) to seek agreement to a supplementary estimate (> £1,000,000 for an area of activity).</p> <p>We will seek agreement from the Executive of the alternative measures held in abeyance across other General Fund services e.g. which will be offset and advise all associated Strategic Directors appropriately.</p> <p>We will carry out a re-assessment of service delivery risks and opportunities and risk and other reserves.</p>	1	5	5
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<p>CRR16: Leadership.</p> <p>If there is a lack of leadership or management skills then this could impact on performance and the ability to deliver positive change.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • Loss of experienced managers. • New skills sets required to meet new challenges. • Poor communication regarding change and new initiatives. • Need to make savings / increase income. 	<p>A senior management restructure is almost complete which will bring permanency and stability for the leadership team.</p> <p>A new Leadership Framework sets out the leadership behaviours and qualities expected of our managers and aspiring managers. Applicants for senior leadership roles are tested against these qualities.</p> <p>An organisation-wide leadership development and engagement programme will support colleagues during the time of transition. The Leadership Framework will be rolled out to provide support to enable our staff to become confident and supportive leaders for our workforce.</p> <p>To promote a positive culture within the organisation, a set of organisation values and behaviours has been created in collaboration with staff focus groups; this will help set the tone of the organisation and assist, in conjunction with the Corporate Strategy priorities, in providing clarity of purpose. It will link directly through to a new performance framework that will provide clarity to staff about the expectations and how their work contributes to the success of the organisation. This will feature in the Workforce Plan which is currently being drafted.</p> <p>Learning and development is available to support staff to meet the expectations of the organisation.</p> <p>The Corporate Strategy and associated Business Plans will provide clarity on priorities and help our workforce focus its attention and resources on the areas that derive greatest results for our communities and residents.</p>	↑	2	5	10	1	5	5
Risk Owner: Head of Paid Service and CLB.	Action Owner: Head of Paid Service and CLB.	Portfolio Flag: Finance, Governance and Performance.			Strategy Theme: Our Organisation.			

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<p>CRR17: Bristol City Council Strategy Management.</p> <p>The council fails to produce or embed a Corporate Strategy with clear links through to business planning and performance management, resulting in less effective implementation of policy, use of resources and/or partnership working.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> Plans, policies, budget and/or resource not aligned to the Corporate Strategy. Significant changes in senior management roles and personnel results in lack of knowledge or a feeling of ownership in relation to the Corporate Strategy. 	<p>Full Council received and approved the Corporate Strategy 2018 - 2023 in February 2018.</p> <p>Cabinet received the BCC Business Plan 2018/19 to note in May 2018. This was based on key elements of Service Plans for every department.</p> <p>We have completed and approved the Performance Framework via Statutory and Policy Board in June 2018. The refreshed Performance Framework follows through the golden thread from Corporate Strategy through to KPIs and management information.</p> <p>Communications plan for embedding Corporate Strategy and Business Plans, including full briefing of all Tier 1 - 3 managers and inclusion in My Performance reviews for all colleagues.</p> <p>An ongoing review of the Medium Term Financial Plan (MTFP) and wider policy / strategy framework to check alignment with Corporate Strategy.</p>	<p>↑</p>	1	7	7	<p>We are rolling out the BCC Communications Plan throughout 2018/19 using many channels including face-to-face Management Brief sessions.</p> <p>The BCC policy and strategy framework will be reviewed in priority order with initial data collection complete. The nature of reviewing strategies across the council means it will be an ongoing process.</p> <p>My Performance reviews are being completed across the organisation and managers are briefed to link personal objectives to the outcomes set out in the Corporate Strategy and Business Plan.</p> <p>The Corporate Strategy is being explained to all new colleagues via the corporate induction process.</p> <p>The Statutory and Policy Board will receive quarterly reporting from Q2. 2018/19 on progress against the Performance Framework.</p> <p>A one-off 'good housekeeping' review of corporate partnerships is planned for Q2 2018/19, creating a refreshed database and reviewing partnership Terms of Reference and/or Service Level Agreements against the Corporate Strategy and emerging partnership governance model as part of the developing One City Approach.</p>	1	5	5
<p>Risk Owner: Section 151 Officer, Acting Executive Director Resources.</p>	<p>Action Owner: Acting Director: Policy and Strategy.</p>	<p>Portfolio Flag: Finance, Governance and Performance.</p>			<p>Strategy Theme: Our Organisation.</p>				

Key internal and external Business Continuity and Civil Contingency Risks to note - Flooding and Brexit.

Corporate Risk Register as at June 2018 - Internal and External Business Continuity and Civil Contingency Risks									
Risk title and description	What we have done	Performance	Current Risk Level			What we are doing	Tolerance Risk Level		
			Likelihood	Impact	Risk Rating		Likelihood	Impact	Risk Rating
<p>Flooding.</p> <p>There could be a risk of damage to properties and infrastructure as well as risk to public safety from flooding which may be caused by a tidal surge, heavy rainfall and river and groundwater flood events.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • Tidal surge, heavy rainfall, river and groundwater flood events. • Impact of climate change. • Lack of effective flood defences and preparedness for major incidents. 	<p>The Avon and Somerset Local Resilience Forum (LRF) is a partnership of all the organisations needed to prepare for an emergency in the LRF area. It includes the emergency services, health services, Maritime and Coastal Agency, Environment Agency, volunteer agencies, utility companies, transport providers and the five councils of Bath and North East Somerset, Bristol, North Somerset, Somerset and South Gloucestershire.</p> <p>Bristol is working with the Avon and Somerset LRF to construct new sea defences around North Somerset, Bristol and South Gloucestershire, working with emergency services, local authorities and other agencies to develop flood response plans and procedures, investigating instances of flooding, training specialist staff in swift water rescue techniques, communicating with housing and business developers to incorporate flood protection into new developments, providing guidance to members of the public about flooding, including flood warnings and what people can do to help themselves, regular maintenance and clearing programs of gullies and culverts, especially in the event of storm warnings.</p> <p>Bristol has in place a local Flood Risk Management Strategy approved at Cabinet in December 2017 which comprises of 5 keys areas and 43 separate actions in line with Environment Agency's national strategy.</p>	↔	3	5	15	<p>There is sustained resourcing and delivery of all actions in LFRMS over life of strategy. Strategy includes the following key projects:</p> <ul style="list-style-type: none"> • Working in partnership with the Environment Agency to develop a Bristol Tidal Flood Risk Management Strategy to protect the city centre, including climate change. • Working in partnership with South Gloucester and the Environment Agency to deliver a flood scheme to help protect Avonmouth Village and the Enterprise Area from tidal flooding, including climate change. 	3	3	9
Risk Owner: Director Transport.	Action Owner: Flood Risk Engineer, Strategic City Transport.	Portfolio Flag: Energy, Waste and Regulatory Services.			Strategy Theme: Our Organisation, Empowering and Caring, Fair and Inclusive, Well Connected, Wellbeing.				

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Risk title and description	What we have done	Performance	Current Risk Level			Tolerance Risk Level		
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<p>Brexit.</p> <p>The uncertainty around Brexit (and the resulting 'deal') may have an impact on the local economy, local funding and delivery of council services. The wider ramifications of the decision to leave the European Union are yet to be fully realised and felt in national and local economy. Whilst there will be some opportunities there is also uncertainty that may affect areas of the economy, financial markets, interest and exchange rates, construction, grants from the EU, Investment and other non-financial aspects.</p> <p>We may see a gradual slow down during period of uncertainty. A potential council impact (+/-) on: Inward investment and EU funding which could reduce and could in turn impact on the council, the city's universities, LEP and the housing market, capital costs resulting from increased cost of labour which could slow business rates growth (Inflation risk is reflected within risk 2 and based on latest OBR predictions), workforce pressures e.g. social care providers, procurement costs, inflationary pressures caused by fluctuations in sterling value and potentially a loss of EU grants funding.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • Gradual slow down during period of uncertainty. • Workforce pressures e.g. social care providers. • Inflationary pressures caused by fluctuations in sterling value. • Loss of EU grant funding. 	<p>The wider ramifications of the decision to leave the European Union are yet to be fully realised and felt in national and local economy. Whilst there will be some opportunities there is also uncertainty that may affect areas of the economy, financial markets, interest and exchange rates, construction, grants from the EU, Investment and other non-financial aspects.</p> <p>The Mayor has in 2016 set up a city-wide response group to better understand the impacts of leaving the EU on our city which now operates virtually - with members updating us on sectoral impact and with the Public Affairs team we are working to ensure that Bristol's interests are represented in the Brexit negotiations, and that the city's voice is heard by UK Government. We have contributed to a national call for information by Government (handled by the Local Government Association (LGA)) seeking input on likely impact of Brexit in different regions. We have lobbied through the Core Cities network seeking clarity over how the Government plans to address the potential EU funding gap.</p>	↔	4	3	12	4	3	12
Risk Owner: Head of Paid Service, Executive Director ACE.	Action Owner: Acting Head of Policy and Public Affairs.		Portfolio Flag: Finance, Governance and Performance.			Strategy Theme: Our Organisation.		

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Corporate Risk Performance Summary for 'Significant Risks' and 'Event' Risks			Quarter 4 January – March 17/18		Quarter 1 April - June 18/19		Quarter 2 July - September 18/19		Quarter 3 October - December 18/19		Quarter 4 January - March 18/19	
Risk ID	Risk	Risk Owner	Rating	Travel	Rating	Travel	Rating	Travel	Rating	Travel	Rating	Travel
CRR1	Long Term Commercial Investments	Executive Director Growth and Regeneration and Section 151 Officer, Acting Executive Director Resources	4x7=28	↔	3x7=21	↑						
CRR2	IT Infrastructure	Interim Director IT	3x7=21	↔	3x7=21	↔						
CRR3	Asbestos Management	Section 151 Officer, Acting Director Resources	3x7=21	↔	3x7=21	↔						
CRR4	Corporate Health, Safety and Wellbeing	Section 151 Officer, Acting Director Resources	3x7=21	↔	3x7=21	↔						
CRR5	Business Continuity and Council Resilience (Split with CRR12)	Executive Director Communities	3x7=21	↔	3x7=21	↔						
CRR6	Fraud and Corruption	Section 151 Officer, Acting Director Resources	3x5=15	↔	3x5=15	↔						
CRR7	Cyber-attack threats and implications	Interim Director IT	3x5=15	↔	3x5=15	↔						
CRR8	Service Review	Section 151 Officer, Acting Director Resources	4x5=20	↔	3x5=15	↑						
CRR9	Safeguarding Vulnerable Children (Split with CRR10)	Executive Director Adults, Children and Education	2x7=14	↔	2x7=14	↔						
CRR10	Safeguarding Vulnerable Adults (Split with CRR9)	Executive Director Adults, Children and Education	2x7=14	↔	2x7=14	↔						
CRR11	BCC Infrastructure Delivery	Executive Director Growth and Regeneration	2x7=14	↔	2x7=14	↔						
CRR12	Civil Contingencies and Council Resilience (Split with CRR5)	Executive Director Communities	3x7=21	↔	2x7=14	↑						
CRR13	Financial Framework and MTFP	S151 Officer and Director of Finance	2x7=14	↔	2x5=10	↑						
CRR14	Information Governance Introduction of the General Data Protection Regulations (GDPR)	Senior Information Risk Owner (SIRO)	2x7=14	↔	2x5=10	↑						
CRR15	Financial Deficit	S151 Officer and Director of Finance	2x5=10	↔	2x5=10	↔						
CRR16	Leadership	Acting Head of Policy and Public Affairs	4x5=20	↔	2x5=10	↑						
CRR17	Strategy Management	Acting Director of Policy and Strategy	2x7=14	↔	1x7=7	↑						

Business Continuity and Civil Contingency Events Risks to note	Risk Owner	Rating	Travel	Rating	Travel	Rating	Travel	Rating	Travel	Rating	Travel
Flooding	Executive Director Growth and Regeneration	3x5=15	↔	3x5=15	↔						
Brexit	Head of Paid Service	4x3=12	↔	4x3=12	↔						

Risk Matrix

Likelihood	4	4	12	20	28
	3	3	9	15	21
	2	2	6	10	14
	1	1	3	5	7
		1	3	5	7
	Impact				

Level of risk	Action required by level risk	
28	Critical:	Action required. Escalate (if a Directorate level risk, escalate to the Corporate Risk Register. Escalate corporate risks to the attention of the Cabinet Lead to confirm action to be taken).
14 - 21	High:	Must be addressed. If Directorate level consider escalating to the Corporate Risk Register. If a corporate risk consider escalating to the Cabinet Lead.
5 - 12	Medium:	Action required, manage and monitor at the Directorate level.
1 - 4	Low:	May not need any further action / monitor at the service level.

Current and Tolerance risk ratings:

The 'Current' risk rating refers to the current level of risk taking into account any management actions, controls and fall back plans already in place. The 'Tolerance' rating represents what is deemed to be a realistic level of risk to be achieved once additional actions have been put in place. On some occasions the aim will be to contain the level of the risk at the current level.

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LIKELIHOOD AND IMPACT RISK RATING SCORING

Likelihood Guidance

Likelihood	Likelihood Ratings 1 to 4			
	1	2	3	4
Description	Might happen on rare occasions.	Will possibly happen, possibly on several occasions.	Will probably happen, possibly at regular intervals.	Likely to happen, possibly frequently.
Numerical Likelihood	Less than 10%	Less than 50%	50% or more	75% or more

Severity of Impact Guidance (Risk to be assessed against all of the Categories, and the highest score used in the matrix).

Impact Category	Impact Levels 1 to 7			
	1	3	5	7
Service provision	Very limited effect (positive or negative) on service provision. Impact can be managed within normal working arrangements.	Noticeable and significant effect (positive or negative) on service provision. Effect may require some additional resource, but manageable in a reasonable time frame.	Severe effect on service provision or a Corporate Strategic Plan priority area. Effect may require considerable additional resource but will not require a major strategy change.	Extremely severe service disruption. Significant customer opposition. Legal action. Effect could not be managed within a reasonable time frame or by a short term allocation of resources, and may require major strategy changes. The Council risks 'special measures'. Officer / Member forced to resign.
Communities	Minimal impact on community.	Noticeable (positive or negative) impact on the community or a more manageable impact on a smaller number of vulnerable groups / individuals which is not likely to last more than six months.	A more severe but manageable impact (positive or negative) on a significant number of vulnerable groups / individuals which is not likely to last more than twelve months.	A lasting and noticeable impact on a significant number of vulnerable groups / individuals.
Environmental	No effect (positive or negative) on the natural and built environment.	Short term effect (positive or negative) on the natural and or built environment.	Serious local discharge of pollutant or source of community annoyance that requires remedial action.	Lasting effect on the natural and or built environment.
Financial Loss / Gain	Under £0.5m	Between £0.5m - £3m	Between £3m - £5m	More than £5m
Fraud & Corruption Loss	Under £50k	Between £50k - £100k	Between £100k - £1m	More than £1m
Legal	No significant legal implications or action is anticipated.	Tribunal / BCC legal team involvement required (potential for claim).	Criminal prosecution anticipated and / or civil litigation.	Criminal prosecution anticipated and or civil litigation (> 1 person).
Personal Safety	Minor injury to citizens or colleagues.	Significant injury or ill health of citizens or colleagues causing short-term disability / absence from work.	Major injury or ill health of citizens or colleagues may result in. long term disability / absence from work.	Death of citizen(s) or colleague(s). Significant long-term disability / absence from work.
Programme / Project Management (Including developing commercial enterprises)	Minor delays and/or budget overspend, but can be brought back on schedule with this project stage. No threat to delivery of the project on time and to budget and no threat to identified benefits / outcomes.	Slippage causes significant delay to delivery of key project milestones, and/or budget overspends. No threat to overall delivery of the project and the identified benefits / outcomes.	Slippage causes significant delay to delivery of key project milestones; and/or major budget overspends. Major threat to delivery of the project on time and to budget, and achievement of one or more benefits / outcomes.	Significant issues threaten delivery of the entire project. Could lead to project being cancelled or put on hold.
Reputation	Minimal and transient loss of public or partner trust. Contained within the individual service.	Significant public or partner interest although limited potential for enhancement of, or damage to, reputation. Dissatisfaction reported through council complaints procedure but contained within the council. Local MP involvement. Some local media/social media interest.	Serious potential for enhancement of, or damage to, reputation and the willingness of other parties to collaborate or do business with the council. Dissatisfaction regularly reported through council complaints procedure. Higher levels of local or national interest. Higher levels of local media / social media interest.	Highly significant potential for enhancement of, or damage to, reputation and the willingness of other parties to collaborate or do business with the council. Intense local, national and potentially international media attention. Viral social media or online pick-up. Public enquiry or poor external assessor report.