

Corporate Risk Register as at December 2019 – Threat Risks to the achievement of Bristol City Councils Objectives.									
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>CRR1: Long term commercial investments and major projects. BCC's long-term commercial investments and major projects may require greater than anticipated capital investment.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> The cost is higher than expected. The project is delivered later than planned. The operating and maintenance cost of the asset exceeds expectations. Strategic, geographic, social, financial and economic conditions changing over time. Oversight of Project Interdependencies not well managed. Insufficient in-house resources to progress major projects lead to missed opportunities to leverage third party investment. Failure to anticipate and secure investment and resources to deliver enabling works and infrastructure. 	<p>In July 2019 the Corporate Leadership Board (CLB) / Capital and Investment Board (CIB) were launched and meet on a monthly basis. They have an oversight and stewardship role for the delivery of the Capital Programme and capital investments.</p> <p>Some examples of recent key projects which were reviewed by CIB include Harbour Strategy, Cattlemarket Road, and Colston Hall.</p> <p>The Growth and Regeneration (G&R) Board meets monthly to continue to improve project, programme and portfolio risk management and to ensure robust arrangements are in place and there is challenge against deliverables.</p> <p>The G&R Board identified a number of Areas of Growth and Regeneration (AGR) across the City to enable place shaping and contribute to regeneration, affordable housing, community building and the financial sustainability of the Council. The AGR are regularly reviewed and re-prioritised by the G&R Board.</p>	↑	2	7	14	<p>The Growth and Regeneration Leadership Team undertook Capital Programme Workshops in August – October 2019 to review and re-prioritise the Capital Programme. This is reviewed on a monthly basis.</p> <p>Colston Hall - we continue to de-risk the building elements of the project. The roof structure has been removed and most of the demolition completed. During this process there have been a number of elements discovered that are of both of historic and archaeological importance. We are working with the relevant Statutory bodies, the Design Team and the Main Contractor to ascertain the best way of dealing with these issues and in due course we will be in a position to assess any effect on cost and/or programme timings.</p> <p>Harbour Strategy: Colleagues across Growth & Regeneration and Resources Directorates are working together to ensure we have a joined up approach to delivering a new Harbour Strategy. We are carrying out condition surveys on the docks walls to produce a future maintenance schedule as part of the BCC Asset Management Plan.</p> <p>Energy: Commissioning a strategic partner to deliver the ambitions as outlined in the City Leap prospectus.</p>	1	7	7
Risk Owner: Executive Director Growth and Regeneration, Executive Director Resources and S151 Officer.	Action Owner: Executive Director Growth and Regeneration, Director Finance, Director Commercialisation and Citizens.	Portfolio Flag: Finance, Governance and Performance.			Strategy Theme: Our Organisation, Empowering and Caring, Fair and Inclusive, Well Connected, Wellbeing.				

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<p>CRR3: Failure to Manage Asbestos. Failure to manage the asbestos management plan for properties.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> Staff availability to carry out work plans in a safe way. Lack of appropriate training. Lack of oversight and control by local management. Lack of information on the potential or known risks. Inadequate contract management arrangements. Lack of effective processes and systems consistently being applied. Policies are not kept up to date. Budget pressures. 	<p>An action plan is in place within Housing department. The plan is being governed on a regular basis by the Health, Safety and Wellbeing Team.</p> <p>Progress has been made to raise the risk profile of asbestos amongst managers and operatives, introduction of more robust strategies for managing staff and contractors, asbestos good working practice is also regularly communicated.</p> <p>Staff and operatives have attended asbestos training.</p> <p>A management directive has been made this training a mandatory requirement for staff at every level with Housing and Landlord Services.</p> <p>Properties are surveyed prior to any work being undertaken by Asbestos Consultants plus an ongoing programme of surveys is being carried out.</p> <p>Asbestos incidents are investigated in-house and appropriate actions taken.</p> <p>Property Services have improved the contract management arrangements with MSS, the surveyor to ensure that all inspections are carried out according to required timescales.</p> <p>A new dedicated safety Team based within Housing and Landlord Services has been created.</p> <p>Property CHASM project is underway, to ensure all premises report on compliance.</p>	↔	2	7	14	<p>The structure of the new team is currently being formulated by the newly appointed Construction Safety Manager.</p> <p>The terms of reference for the new Team are being developed, it is envisaged that the team will take working responsibility for the Keystone asbestos management software and for leading other asbestos improvement strategies. Jan 2020.</p> <p>We are holding regular 'Asbestos working group' meetings to progress the management of Asbestos across the authority. Ongoing.</p> <p>Now that progress has been made with the plan, a second detailed review will be carried out by the Safety Health and Wellbeing Team and the Construction Health and Safety Manager to reassess the effectiveness of all action that has been taken to date and to ensure the Asbestos Management arrangements are continually improving. Jan 2020.</p> <p>Mandatory asbestos staff training within Housing and Landlord Services is in progress.</p>	1	7	7
Risk Owner: Head of Paid Service and Corporate Leadership Board (CLB) / Director HR, Workforce and Organisational Design.	Action Owner: Director of Commercialisation and Citizens (for Corporate Estate) and Director of Housing and Landlord Services (for Social Housing).	Portfolio Flag: Finance, Governance and Performance.			Strategy Theme: Our Organisation.				

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<p>CRR4: Corporate Health, Safety and Wellbeing.</p> <p>If the City Council does not meet its wide range of Health & Safety requirements then there could be a risk to the safety of employees, visitors, contractors, citizens and BCC corporate body.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • If services do not have sufficient staff numbers to carry out work plans in a safe way. • If services are not able to order appropriate equipment required for staff safety. • Lack of appropriate equipment. • Lack of appropriate training. • Lack of oversight and control by local management. • Lack of information on the potential or known risks. • Inadequate contract management arrangements. • Lack of effective processes and systems consistently being applied • Policies are not kept up to date. 	<p>The Corporate Safety, Health & Wellbeing (SH&W) team support the council and provide advice and guidance. The Corporate Policy Statement, service specific policies, procedures and systems of work/safety arrangements are in place and routinely reviewed.</p> <p>BCC has a Corporate Health and Safety Management System (CHaSMS) to identify and monitor hazards, risks and appropriate actions. Each manager (with staff and /or premises responsibilities) has an action plan which is completed on a quarterly basis. Once completed the HS&W team check the returns and give relevant feedback to the individual Managers and report the overall results to Senior Management/EDM and develop appropriate action plans.</p> <p>BCC has a comprehensive programme of e-learning and personal face to face course delivery available to all directors, managers, staff and members.</p> <p>There is a corporate accident/incident reporting procedure. The Corporate Safety Information System is in place to share with staff details of addresses which due to potential violence & aggression or police notification are considered to present risks.</p> <p>Benchmarking and annual reports are provided to BCC along with the annual performance report.</p> <p>All contracts set up with external providers include a check of their relevant Health and Safety competency.</p> <p>The council's audit programme monitors compliance with statutory duty and best practices.</p> <p>We have reviewed the Health and Safety Management arrangements and developed a (project) service development and improvement plan.</p>	↔	2	7	14	<p>A revised electronic accident/incident local reporting database is being developed; approval will be required by the Project Board. Target date April 2020.</p> <p>The Project plan and work streams are being implemented to improve all elements of the health and safety management system. This plan is being governed quarterly by Statutory and Policy Board. Ongoing.</p> <p>All policies and procedures are being reviewed and refreshed. Target date April 2020.</p> <p>CHASMs will be expanded to include a greater focus on property risk, with a new arrangement for those "persons in charge" for reporting and discussing premises risks. Target date May 2020.</p> <p>A review of training is being undertaken. Linked to CHASM review by April 2020.</p> <p>Arrangements for controlling risks of Hand Arm Vibration, Noise and respiratory sensitizers will be carried out, with a supporting Occupational Health Surveillance programme where required. Programme started – ongoing.</p> <p>A refreshed focus on wellbeing and health is in progress with a plan in place within the project Improvement Plan to focus on mental health. Work has started and is ongoing.</p> <p>Time to Change action plan scheduled for April 2020 which will be monitored. Started and ongoing.</p> <p>Improved collaboration between Safety, Health & Wellbeing, Risk and Insurance, Civil Contingencies (including Business Continuity), Procurement and Legal Services</p>	1	7	7
<p>Risk Owner: Head of Paid Service and Corporate Leadership Board (CLB).</p>	<p>Action Owner: Director of Workforce Change.</p>	<p>Portfolio Flag: Finance, Governance and Performance.</p>	<p>Strategy Theme: Our Organisation.</p>						

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<p>CRR5: Business Continuity and Councils Service Resilience.</p> <p>If the council has a Business Continuity disruption and is unable to ensure the resilience of key BCC operations and business activities, then the impact of the event maybe increased with a greater impact on people and council Services.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • Strikes (People, Fuel). • Loss of key staff (communicable diseases and influenza epidemics). • Loss of suppliers. • Loss of accommodation to deliver key services. • Loss of equipment. • Any event which may cause major disruption. • Unavailability of IT and/or Telecoms. • Loss of staff/staff availability. • Knowledge loss. • Reduced chances of preventing/responding to incidents due to a lack of forward planning or investment. 	<p>The council's Corporate Resilience Group (CRG) is supported by directorate representatives who meet quarterly to oversee the council's Business Continuity arrangements / receive significant risks outside council's Control which are reflected on the Local Resilience Forum Community Risk Register (LRF).</p> <p>Policies and procedures are in place. The Business Continuity Policy communicated to relevant staff. The Incident Response Plan updated in December 2019.</p> <p>Service Business Continuity Plans undergo 'refreshing by services' annually.</p> <p>An Incident Management Team training session was carried out November 2019.</p> <p>A Senior Management on-call rota has been devised agreed and is regularly monitored.</p> <p>A successful annual Pandemic Flu-themed continuity exercise was held on 5 Nov 2019.</p> <p>CLB accepted growth bid for extra staff on Civil Protection Unit (CPU) team.</p> <p>A Business Continuity Coordinator has been recruited and in post since the beginning of December 2020 and will lead the February review of service BC Plans.</p>	↔	2	5	10	<p>The Business Continuity Policy and the Corporate Business Continuity Plan will be reviewed before the end of the financial year.</p> <p>Annual Service Continuity Plan reviews.</p> <p>Business Continuity refresher training - workshops held at 100TS and City Hall.</p> <p>A review of Service Level Business Continuity Plans will be carried out in early 2020. We are introducing a quality assurance approach for our business continuity plans to emphasise service accountability.</p> <p>The Businesses Continuity Working Group will be refreshed within the year and we are currently drafting a plan for future exercises to test different elements of BCC Business Continuity arrangements with partners.</p>	1	7	7
Risk Owner: Executive Director Growth and Regeneration / Head of Paid Service.	Action Owner: Director Management of Place and Civil Protection Manager.	Portfolio Flag: Finance, Governance and Performance.	Strategy Theme: Our Organisation, Wellbeing.						

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<p>CRR6: Fraud and Corruption.</p> <p>Failure to prevent or detect acts of significant fraud or corruption against the council from either internal or external sources.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • Failure of management to implement a sound system of internal control and/or to demonstrate commitment to it at all times. • Not keeping up to date with developments in new areas of fraud. • Insufficient risk assessment of new emerging fraud issues. • Lack of clear management control of responsibility, authorities and / or delegation. • Lack of resources to undertake the depth of work required to minimise the risks of fraud / avoidance. • Under investment in fraud prevention and detection technology and resource. 	<p>A Policy is in place on anti-fraud, corruption and bribery and a Bribery and Corruption review has been completed which concluded that controls in the services most at risk of corruption are in place.</p> <p>The counter Fraud and Investigations team concentrates on areas of high fraud risk, investigates fraud promptly where suspected and sanctions appropriately.</p> <p>An accessible route to report suspected fraud is available to both the public and employees via a Whistleblowing Policy.</p> <p>We have been improving awareness of fraud and compliance through a process of reminders about ethics and conduct, fraud awareness training and other publicity, continual maintenance of Counter Fraud information on Web pages and monitoring and review of the effectiveness of the Counter Fraud Arrangements.</p> <p>Counter Fraud Performance is monitored by Audit Committee via the Annual and half yearly Counter Fraud Update, periodic Internal Audit Updates and the Annual review of arrangements against CIPFA Count Fraud Assessment Tool. Improvements are highlighted in an action plan which is monitored by Audit Committee.</p> <p>An initiative to provide an amnesty period for tenancy fraudsters to return keys to Council properties has been completed.</p> <p>We are monitoring fraud indicators (warning signs and fraud alerts) to ensure anti- fraud approach is correctly targeted and we regular meet with Legal services to ensure cases progress swiftly.</p> <p>Data sets submitted to National Fraud Initiative and output received for review.</p>	↔	3	5	15	<p>The Fraud Policy is currently being reviewed and updated.</p> <p>Work is underway with legal services to ensure maximum recovery with minimum resource. Analysis of how much 'recoverable' overpayment is actually 'recovered' is currently underway to ensure resources are targeted most effectively.</p> <p>By investing in specialist fraud prevention and detection software and utilising cross organisation data will minimise the council's exposure to fraud risk and aid early detection / prevention. Project to develop a New Fraud Case Management System and data hub is being considered. Ongoing exercises to establish proof of concept are under way.</p> <p>Council wide fraud and avoidance initiatives will continue on a rolling basis and include the following:</p> <ul style="list-style-type: none"> • NNDR Small Business Rate Relief • National Fraud Initiative • Personal Budgets • Bribery and Corruption Risk Assessment 	2	5	10
Risk Owner: Executive Director Resources and Director of Finance (S151 Officer).	Action Owner: Director of Finance and Chief Internal Auditor.	Portfolio Flag: Finance, Governance and Performance.	Strategy Theme: Our Organisation.						

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<p>CRR7: Cyber-Security.</p> <p>The Council's risk level in regards to Cyber-security is higher than should be expected.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> Lack of investment in appropriate technologies. Reliance on in-house expertise, and self-assessments (PSN). Lack of formal approach to risk management (ISO27001). Historic lack of focus. 	<p>Budget provision for Cyber Security was allocated within the Future State Assessment Plan (FSA) as approved by Cabinet June 2018.</p> <p>Independent full security assessments were carried out November 2018.</p> <p>An Information Governance Board was established to provide oversight of information security and an escalation point to the Council's SIRO.</p> <p>Head of Information Assurance commenced in post September 2019.</p>	↔	3	7	21	<p>The Council is starting to use a SIRO checklist to capture and escalate cyber security risks.</p> <p>The Council is procuring an Information Security Management System which will review and enhance the Council's policies and strategies for information management. The Information Assurance Service is working closely with the Council's ICT Department to improve the approach to all aspects of Information Assurance (including adoption of ISO27001).</p> <p>The ITTP (formerly FSA Programme) currently has plans to implement technology platforms to move the Council from file storage to document storage platforms, increase team collaboration without use of email, implement file retention policies, introduce document marking and rights management, implement data classification and improve federated search across structured and unstructured data stores.</p> <p>The ITTP (formerly FSA Programme) will align with the new Information Assurance approach and the strategy set by the Council's SIRO.</p> <p>As well as technical controls, the Council continues to carry out regular Phishing attack exercises where we are sending emails to staff to see how users react to this type of Cyber Attack. Anyone clicking on links is directed towards targeted training.</p> <p>The Information Assurance and ICT team will continue to work together to support the SIRO to develop appropriate targeted training for all Council staff relating to cyber security.</p>	1	5	5
Risk Owner: Senior Information Risk Owner (SIRO).	Action Owner: Director, Digital Transformation.	Portfolio Flag: Finance, Governance and Performance.			Strategy Theme: Our Organisation.				

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<p>CRR9: Safeguarding Vulnerable Children.</p> <p>The council fails to ensure that adequate safeguarding measures are in place, resulting in harm or death to a vulnerable child.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> Failure to meet the requirements of the Children Act and associated legislation. Inadequate controls result in harm. Demand for services exceeds its capacity and capability. Increase in complex safeguarding risks, criminal exploitation, serious youth violence and gang affiliation. 	<p>The Keeping Bristol Safe Board provides independent scrutiny of children's safeguarding arrangements in the city and holds BCC and partner agencies to account. This includes delivery of Safer Communities and the Prevent Duty.</p> <p>BCC works with partners to effectively identify victims and perpetrators of extra-familial abuse including Child Sexual exploitation, Criminal Exploitation and Serious Violence, taking action to disrupt and protect.</p> <p>Bristol's published policies and procedures, comprehensive training and development and monthly professional supervision help ensure safe practice and adequate control of risks.</p> <p>Bristol has invested in an integrated localities and team around the school and family approach aimed at meeting the needs of children and families at the earliest point.</p> <p>Children and Families' Services invests in its workforce and provides career progression opportunities.</p> <p>Bristol has established Violence Reduction Unit focussing on prevention, disruption and recovery from serious youth violence and is working with the University of Bedfordshire to develop its approach to contextual safeguarding in the city.</p>	↔	2	7	14	<p>Information sharing and analysis to improve our ability to understand and respond to children at risk of criminal exploitation and going missing.</p> <p>In response to an identified and increasing risk of serious youth violence and criminal exploitation a multiagency plan is being implemented under the Serious Youth Violence Exec Group.</p> <p>Service Delivery Plans for 2020-21 set out further actions to mitigate risks identified and deliver on our ambitions for children and families.</p>	1	7	7
Risk Owner: Executive Director, People	Action Owner: Director Children's and Families Services.	Portfolio Flag: Children and Young People.			Strategy Theme: Our Organisation, Empowering and Caring, Wellbeing.				

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<p>CRR10: Safeguarding Adults at Risk with Care and support needs.</p> <p>The council fails to ensure adequate safeguarding measures are in place, Adults at risk.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • Adequacy of its controls. • Management and operational practices. • Demand for its services exceeded its capacity and capability. • Poor information sharing. • Lack of capacity or resources to deliver safe practice. • Failure to commission safe care for adults at risk. • Failure to meet the requirements of the “Prevent Duty” placed on Local Authorities. 	<p>The Adults Safeguarding Board has been reconstituted into the Keeping Bristol Safe Board which also includes responsibility for Children and Community Safety. The Board has senior executive representation and will ensure a strong focus on strategic matters of concern. The constitution for the Board has been confirmed and it will meet regularly and have oversight of safeguarding priorities.</p> <p>Safeguarding improvement plans are in place for Older People, Physical Disability and Disabled Children and the Capability framework for safeguarding and the Mental Capacity Act have been introduced. The Adult Change Programme ‘Better Lives’ Transforming Care Programme has been established to implement policy objectives of moving people into more suitable care settings.</p> <p>We have an active strategy in place to attract, recruit and retain social workers through a variety of routes with particular emphasis on experienced social workers. The Adult South West Recruitment and Retention Strategy has been drafted, the risks and costs identified. The strategy will be presented through the Decision Pathway. Regular strategies and campaigns support the recruitment and retention of high calibre social workers and managers, with competent agency social workers and managers used on temporary basis to fill vacancies.</p> <p>All key staff working with people directly at risk are trained in the essentials of safeguarding and BCC has an ongoing awareness-raising ‘Prevent’ training programme.</p> <p>Regular reporting on safeguarding is taking place quarterly for Directors and Cabinet Members, with an annual report for elected Members to allow for scrutiny of progress. The quality assurance framework and performance framework is routinely monitored and reported on.</p> <p>Focused work is being undertaken to address the backlog in safeguarding referrals and good progress has been made in bringing the number outstanding down to more manageable numbers.</p>	↔	2	7	14	<p>Social workers working with Multi-agency partners supporting Adults and elderly people to live safely within their families and communities.</p> <p>We are increasing capacity this year in the commissioning team to lead on monitoring quality in the care sector. Improving the quality services for those who need it and ensuring effective management oversight.</p> <p>It is planned to make a one off retention payment to all social workers as part of the council's retention policy. A wider review of the remuneration package for social workers is planned to improve recruitment and retention.</p> <p>Review of the Safeguarding Pathway.</p> <p>Transforming the Safeguarding Adults Board.</p> <p>Considering transformational approaches to home care re-commissioning that may offer a more flexible employment offer.</p> <p>Planning placed based approaches to include working with micro providers.</p>	1	7	7
Risk Owner: Executive Director, People	Action Owner: Director Adult Social Care.		Portfolio Flag: Adult Social Care.			Strategy Theme: Our Organisation, Empowering others and Caring, Fair and Inclusive, Well connected, Wellbeing.			

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<p>CRR12: Failure to deliver suitable emergency planning measures and respond to and manage emergency events when they occur. (Civil Contingency and Resilience)</p> <p>If the City has a Major Incident, Contractor Failure or the council inadequately responds, then the impact of the event may be increased with a greater impact on people and businesses.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • Critical services unprepared or have ineffective emergency and business continuity plans and associated activities. • Lack of resilience in the supply chain hampers effective response to incidents. • Lack of trained and available strategic staff. 	<p>BCC plays a leading role in the Avon and Somerset Local Resilience Forum (LRF), the multi-agency 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. The Avon and Somerset works to the Avon and Somerset Community Risk Register.</p> <p>A system is in place for ongoing monitoring of severe weather events (SWIMS).</p> <p>Emergency planning training has been rolled and a multi-agency exercise is regularly conducted to test different elements of BCC emergency arrangements with partners. The most recent exercises being Day Two May 2018, Dark Zodiac April 2018, Saxon Resolve November 2017 and major COMAH training exercise in November 2018 (Operation Spitfire).</p> <p>A senior management on-call rota has been devised, agreed and is monitored. Emergency volunteers have been recruited to aid emergency responses. Duty rotas in other key service delivery areas (e.g. Housing and Social Care) are also in place.</p> <p>The Bristol Operations Centre capacity to support multi-agency operations has been tested.</p> <p>BCC took receipt the South West’s share of the National Emergency Mortuary Equipment in July 2018 and arrangements for establishing Flax Bourton Public Mortuary as a dedicated disaster mortuary are in place.</p> <p>A progress paper on Civil Contingency is scheduled to go to the Corporate Leadership Board in early 2020.</p> <p>Recruitment and training of additional Emergency Centre Managers and Emergency Volunteers is ongoing.</p> <p>A review and exercise of the COMAH (Control of Major Accident Hazards) Plan is complete.</p>	↔	2	7	14	<p>An ‘Introduction to Emergency Planning’ e-learning package is in progress.</p> <p>Emergency Planning College (EPC)-led Strategic Incident Management Training session was delivered to senior officers in November 2019.</p> <p>Voluntary agency capacity to support incidents has been reviewed by BCC through the LRF.</p> <p>Training for staff to support incident response and recovery (admin, logging, logistics and support to victims, survivors and evacuees) is ongoing.</p>	1	7	7
Risk Owner: Executive Director Growth and Regeneration.	Action Owner: Director Management of Place.		Portfolio Flag: Finance, Governance and Performance.			Strategy Theme: Our Organisation, Wellbeing.			

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<p>CRR13: Financial Framework and Medium Term Financial Plan (MTFP).</p> <p>Failure to be able 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"> Failure to achieve Business Rates income- appeals/general economic growth/loss of major sites (in budget setting). 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. Governments spending review 2020. 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 to significantly reduce the government funding available to the council alongside possible increase in demand for council services. Embedding of the new national funding formula for schools and High Needs. 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 cost. 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 the 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 maintaining of the evolving financial model that reflects in a timely manner changes in national and local assumptions. The level of reserves and balances are regularly reviewed to ensure that account is taken of any financial/economic risk and the adequacy of general reserves is determined as part of this exercise. 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. Changes to savings in year are monitored by delivery executive. <p>Restructured the finance team and planned skills development remains a key priority which will include commercial and business acumen. This will be an ongoing and aligned with professional development.</p> <p>Ensuring that Bristol City Council is engaged with or receiving timely feedback from the range of Government working groups exploring future local funding.</p> <p>Refreshed of the MTFP and Capital Strategy and expanded our model to take in a longer term view.</p>	↔	2	5	10	<p>A review will be ongoing to identify a programme of propositions that exceed the forecasted budget gap to provide members with options and headroom for variations in financial estimates.</p> <p>2020 Budget presented to Cabinet to consider and recommend to Full Council for approval Feb 2020.</p> <p>CIPFA Financial Management Code for Local Authorities has been released for full implementation from April 2021 which will have some additional requirements for the Council's financial management and governance of which we will seek to begin some implement measures in shadow form from April 2020.</p>	1	5	5
Risk Owner: S151 Officer and Director of Finance.	Action Owner: Section 151 Officer, Executive Director Resources and Director of Finance.	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. Impairments in our commercial Investments are realised. 	<p>BCC's Financial framework ensures that we have in place sound arrangements for financial planning, management, monitoring and reporting through to Corporate Leadership Team and Cabinet.</p> <p>The ongoing review and due diligence of all budget savings by Delivery Executive, Corporate Leadership Board and the Executive continues to be captured and monitored in the reports to Cabinet.</p> <p>We refreshed the Policy and Budget Framework and provided greater clarity in relation to the approval process for supplementary funding both capital and revenue.</p> <p>We have continual oversight and ongoing management of the council's financial risks and deep dives in areas reported of non-containable pressures.</p> <p>Regular reviews have been undertaken on the level and appropriateness of the earmarked reserves and where redirections have been south reported to Cabinet.</p>	↔	2	5	10	<p>Recovery plans are being fully assessed and requirements for any supplementary estimates will be incorporate into the period 8 monitoring reports and ongoing pressures and growth captured in the 2020/21 Budget report.</p> <p>Ensuring engagement at local, regional and national level in round table and working groups to keep abreast the spending review (now scheduled for 2020), Business Rates retention and new funding formulas for Local Government. To ensure funding for Bristol is maximised and impact of changes are fed into our long term financial planning and strategic planning.</p> <p>Ensure that there are sufficient reserves available to provide the Council with some resilience to material variations in spend forecasting and economic shocks.</p> <p>We will carry out frequent re-assessment of service delivery risks and opportunities and risk and other reserves.</p>	1	5	5
Risk Owner: S151 Officer and Director of Finance.	Action Owner: Section 151 Officer, Executive Director Resources and Director of Finance.	Portfolio Flag: Finance, Governance and Performance.	Strategy Theme: Our Organisation.						

Corporate Risk Register as at December 2019 – Threat Risks to the achievement of Bristol City Councils Objectives.									
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<p>CRR18: The risk of failing to deliver the range of housing to meet Bristol's needs and not realise the ambition to deliver 2000 homes, of which 800 are affordable, per annum by 2020.</p> <p>Strategies and delivery models designed to further stimulate growth in the housing market and deliver diversity of the housing offer across the city prove to be ineffective and do not attract and retain economically active residents.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • Not enough planning applications submitted. • Not enough permission granted. • Inability of the housebuilding industry to deliver at this level. • Increased uncertainty in the market due to Brexit. • Lack of capacity within the council's delivery system and the local market. • Insufficient housing land identified in planning documents. 	<p>Secured planning permissions.</p> <p>Secured additional grant funding for infrastructure.</p> <p>Releasing land.</p> <p>Issuing grants to Registered Providers (RPs).</p> <p>Established Local Housing Company (Goram Homes).</p> <p>Secured funding from Homes England under HIF and Accelerated Construction and Community Development in order to release further housing land.</p> <p>Established a grant funding programme to subsidise the delivery of affordable homes.</p> <p>Introduced the Affordable Housing Practice Note.</p> <p>Working collaboratively with Homes England to maximise subsidy in schemes to provide as much affordable housing as possible.</p> <p>Requiring a minimum of 30% affordable housing on land released by the Council.</p>	↔	2	5	10	<p>We are addressing all areas of provision including: Community Led Housing (CLH), Registered Providers (RPs) and Direct Delivery, (New Council Homes).</p> <p>We are carrying out a Service Review of the Housing Delivery Team.</p> <p>Significant land release programme to Registered Partners (RPs).</p> <p>We are looking at opportunities to fund the acquisition of additional units in developments on site.</p> <p>External funding bids have been made to secure infrastructure funding to accelerate delivery.</p> <p>Revised the Affordable Housing Grant Funding Policy to ensure it is relevant and assist the delivery of new affordable homes.</p> <p>Working Closely with Homes England to ensure additional subsidy is secured</p> <p>Identifying opportunities to acquire additional affordable homes off the shelf.</p> <p>We are monitoring performance closely.</p>	1	5	5
Risk Owner: Executive Director Growth and Regeneration.	Action Owner: Director Development of Place.	Portfolio Flag: Housing.			Strategy Theme: Fair and Inclusive.				

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<p>CRR19: Tree Management.</p> <p>Risk of trees and tree limbs falling and causing harm to people or property due to unfavourable weather conditions and tree diseases.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • The Council has 100,000 trees. Severe weather conditions and / or disease can leads to tree failure. • Lack of maintenance of trees can result in tree failure. • Some council trees are not being managed or inspected, increasing the chance of failure. 	<p>Analysis of all trees is the main task and this takes time to complete.</p> <p>Analysis work on trees is underway by the tree team and Desktop mapping is complete.</p> <p>Cabinet report in June2019 was agreed including re-procuring the tree management contract to create additional capacity to manage all off the councils trees. The cost of this will be covered by the departments on whose land the trees are situated - more finance work is needed on this.</p>	↔	3	5	15	<p>Analysis continues on trees potentially at risk. Desktop mapping is completed and trees will need to be assessed.</p> <p>Contract has been extended for tree maintenance</p> <p>Budget for 18/19 has been protected. Budget for 19/20 is available to continue tree analysis and maintain trees on the existing contract.</p> <p>Additional resource being recruited to undertake the work.</p> <p>New tree management contract going through procurement process.</p>	1	5	5
Risk Owner: Executive Director Growth and Regeneration.	Action Owner: Director Management of Place.	Portfolio Flag: Communities.			Strategy Theme: Our Organisation, Wellbeing.				

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<p>CRR21: General Data Protection Regulation (GDPR) compliance.</p> <p>If the Council fails to maintain a defensible and compliant response to the Data Protection Act 2018 and General Data Protection Regulation (GDPR) then it will fail to fully comply with its statutory requirements.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> 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 Steering Group and Working Group is in place and regular reports continue to be provided to Executive Directors Meetings (EDM's) to ensure that the high-level of engagement and buy-in across all levels of the organisation is maintained.</p> <p>Improved data breach reporting for EDM's.</p> <p>Guidance on GDPR compliance and breach reporting has been published on the Council's intranet (Source).</p> <p>Improved PIA process and PIA register.</p> <p>Business Continuity plan produced and updated to reflect new IG Service.</p> <p>The Council provides e-learning training for new starters on data protection.</p> <p>Data protection staff have attended training courses to maintain up to date knowledge and expertise.</p>	↔	2	5	10	<p>Continuing delivery of prioritised objectives to embed GDPR compliance in this quarter we are working on:</p> <ul style="list-style-type: none"> New starters induction and awareness training. Training for offline staff. Reviewing procurement templates. Reviewing data protection policies. Progressing the business case for a privacy management system (with Head of Service and Director). Implementing a case management system. Team training plan. Targeted training for data protection champions within the Council. The purchase of a privacy management system is being considered as part of service and budget planning for 2020/21. 	2	3	6
Risk Owner: Senior Information Risk Owner (SIRO).	Action Owner: Senior Information Risk Owner (SIRO) and Statutory Data Protection Officer (SDPO).	Portfolio Flag: Finance, Governance and Performance.			Strategy Theme: Our Organisation.				

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<p>CRR22: Partnerships Governance</p> <p>If the council does not maximise (or cannot quantify) the benefits of partnership working and/or experiences negative or counter-productive results may arise from partnership working.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> Failure to establish and/or manage contracts, Service Level Agreements and/or Terms of Reference in relation to partnerships. Not maintaining a central register of partnerships, membership, governance arrangements and performance measures. No identified lead officer to progress development of partnership working as in proposals presented to the Audit Committee in April 2016. Outdated partnership policy and toolkit (last iteration 2010). A broad range of partnerships with variable degrees of formality. 	<p>BCC has close involvement of Elected Mayor and Members in key partnerships. Regular review and evaluation of the current position by CLB.</p> <p>BCC has mechanisms in place for regular dialogue including formal partnerships.</p> <p>The role of Director: Policy and Strategy has been expanded to include oversight of partnerships and a permanent appointment to this post has been made.</p> <p>A refreshed Partnerships Policy has been drafted and iterated in consultation with relevant business partners. (June-Dec 2019).</p> <p>Scoping and reviewing the need for Commercial Training for relevant managers as part of Procurement and Commercial Strategy.</p> <p>Created a central partnership register.</p>	↑	2	3	6	<p>We are reviewing and refreshing the Partnership Policy and Toolkit.</p> <p>Creating a template Terms of Reference and porting existing Terms of reference to it where required.</p>	2	3	6
Risk Owner: Head of Paid Service.	Action Owner: Head of Policy and Public Affairs	Portfolio Flag: Finance, Governance and Performance.			Strategy Theme: Our Organisation.				

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<p>CRR23: Better Lives Programme.</p> <p>Failure to deliver the required outcomes and savings from the Better Lives Programme, whilst delivering against our statutory duties and maintaining quality services.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> Increased demand and complexity of Service Users' needs. The Provider Market is unable to meet needs in the required way and/or we suffer relationship breakdown. Other Directorates within the organisation are unable to support the Programme in the way required. Statutory requirements of Adult Social Care (ASC) mean resources have to be diverted away from Programme activity. Changes to the priorities of the wider health system and/or the National context, requires us to divert resources/focus away from the Programme's objectives. 	<p>Programme Board in place that meets monthly with representation from Executive Directors, cabinet member for Adults and NHS and has a key governance role for the Programme in terms of managing risk. Risks and issues are shared and actions and decisions arising are minuted and logged. The Programme Senior Responsible Officer (SRO) flags up risks and issues at key internal governance meetings e.g. People EDM, Statutory & Policy Board.</p> <p>A Trajectory management approach tracks key performance metrics across all areas which are shared with Programme Board, ASC DMT and People to identify risks, dependencies and alter priorities accordingly.</p> <p>Key interventions to improve Provider Market's ability to respond to changing requirements and needs e.g. Bristol Price introduced for residential and nursing care and unit cost for Home Care.</p> <p>Working closely with wider Council partners where there are dependencies e.g. Change Services, Housing, Communities, Information Communication Technology (ICT) and Procurement colleagues as well as external partners including NHS where there is direct impact between services.</p> <p>All workstreams focussing on practice which ensure we are meeting statutory requirements and that people receive the correct care and support, including a Reviews workstream.</p> <p>Interventions that are impacting new demand and enabling individuals to maximise their independence e.g. the introduction of the Bristol Price; increased capacity and investment in Home Care; increased capacity in the Reablement Service; Introduced a new Home First Service and a new Technology Enabled Care offer.</p>	↔	2	7	14	<p>Current phase of programme includes activities to deliver further changes which are required around Older People's services and an increased focus on Adults of Working Age and Preparing for Adulthood and Preparing for Adulthood.</p> <p>Provider reviews to ensure that people are receiving the right care and support and freeing up capacity in the Market is now embedded into business as usual.</p> <p>New technology and ways of working to our Home First and Reablement teams in place and continue to increase the capacity of the Reablement service to the required level.</p> <p>Introducing a further rate increase for Home Care.</p> <p>Embedding the new Pathway to Independence service.</p> <p>Safeguarding Pathway review to ensure greater efficiency and response to Safeguarding Alerts.</p> <p>Opening two new Extra Care Housing sites in the City each with 60 units with BCC nomination rights (120 units in total). Also new 'First Home' provision for young adults (Preparing for Adulthood) March 20.</p>	1	7	7
Risk Owner: Executive Director, People	Action Owner: Director Adult Social Care.	Portfolio Flag: Adult Social Care.			Strategy Theme: Our Organisation, Empowering others and Caring, Fair and Inclusive, Well connected, Wellbeing.				

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<p>CRR24: Procurement and Contract Management Compliance</p> <p>Failure to ensure that BCC:</p> <ul style="list-style-type: none"> Achieves value for money when purchasing goods and services. Complies with legislation (including the risk of legal challenge), quality and cost. Meets social value requirements for contract awards. Ensure orders for goods / services are efficiently placed and observes agreed terms. BCC do not take into account long term view with regards to TCO (Total Cost of Ownership) & Life Cycle Costs. High incidence of non-contracted spends. <p>Key potential causes are:</p> <ul style="list-style-type: none"> Poor / weak pre procurement forward planning and tender specifications. Over reliance and inappropriate use of waivers. Ineffective Supply chain and market engagement. Poor / weak contract monitoring. Supplier failure and missed opportunities of warning signs. 	<p>The Procurement Service has been subject to a number of changes to the Procurement service which includes the following:</p> <ul style="list-style-type: none"> Combined the "Procurement Service" and CSRSM under one service area as the new Strategic Procurement and Supplier Relations Service. Alignment of resources at Senior Management to enable direction of resources across Category Areas, Governance and Contract Management. Overhauled the Procurement Rules endorsed by Full Council in December 2019 and the streamlined the procurement process in line with Officer Delegated Authority providing greater empowerment and accountability. Related Audit report recommendations captured and plans established to address identified issues. Procurement resources engaged from inception on a number of key strategic projects e.g. City Leap and engagement on the service planning of the Service in the Council's Service Planning Process. 	↔	3	5	15	<p>A Service improvement plan is being developed to address some of the issues outlined in Internal Audit reports.</p> <p>Additional resources capacity being considered for Contract Management and service delivery.</p> <p>Strengthen the reporting to CLB / statutory policy board on areas of compliance, procurement rules and PFI reporting</p>	3	3	9
Risk Owner: Section 151 Officer, Executive Director Resources.	Action Owner: Director Finance (Section 151 Officer).	Portfolio Flag: Finance, Governance and Performance.			Strategy Theme: Our Organisation.				

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<p>CRR25: Suitability of Line of Business (LOB) systems</p> <p>The Councils reliance on legacy systems.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • Lack of desire to change; systems. • Significant transition activity leads to systems being expensive/complex to change. • Lack of understanding of consequences of not changing systems on ICT. • Lack of adherence to Procurement rules in relation to re-procurements. 	<p>IT Services continue to highlight risks and shortcomings with systems (in an informal manner) to Heads of Service and Senior Leadership whilst the on-going formal review continues. We continue to work with Information Assurance colleagues in regards to those systems which may perpetuate a Cyber Security or Information Management risk.</p>	↔	4	5	20	<p>Planning for the roll out Windows 10, ICT are undertaking a review of the Council’s application portfolio to check compatibility with the new operating system. This has resulted in a widening of the review to look at a number of other aspects, such as cost, contract status, security and whether the functionality could be delivered through other products/solutions.</p> <p>We will continue to assess functionality and compatibility of LOS systems as part of the roll out of Windows 10. This will continue through to mid-2020.</p> <p>It is the intention of ITTP to produce a report against the Council’s line of business review which places the applications into groups which can be considered by stakeholders for replacement/removal/upgrade.</p>	2	5	10
<p>Risk Owner: Senior Information Risk Owner (SIRO) for Cyber Security. Service Areas for BCP/DR.</p>	<p>Action Owner: Director, Digital Transformation.</p>	<p>Portfolio Flag: Finance, Governance and Performance.</p>			<p>Strategy Theme: Our Organisation.</p>				

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<p>CRR26: ICT Resilience</p> <p>The Councils ability to deliver critical and key services in the event of ICT outages, and be able to recover in the event of system and/or data loss.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • Poor BCP planning and understanding of key system architecture. • Untested DR arrangements including data recovery. • Untested network reconfiguration to alleviate key location outage. • Untested recovery schedules in terms of order and instructions. • Lack of resilience available for legacy systems (single points of failure – people and technology). • Services undertaking their own IT arrangements outside of the corporate approach. 	<p>Resilience has been implemented within the Corporate Network to ensure that the network remains active and available in the event of a building becoming unavailable or a circuit being interrupted. Work to date.</p> <p>Backups are held within, and external, to the corporate network to ensure availability. Work to date.</p> <p>The IT Transformation Programme has the movement to more resilient hosting as part of a core deliverable. Utilising cloud hosting improves resilience and recovery and enables access to key systems from outside of the corporate network, and if necessary, from non-corporate devices.</p> <p>The ITTP includes the review of future DR arrangements with the move to cloud for most services, and a move to crown hosting for remaining, servers.</p> <p>The ITTP includes work to aid with the survivability and recovery of Cyber Security Incidents which will aid the resilience of key Council systems.</p>	↔	2	7	14	<p>The Council has a contract with a third party to provide DR capability. The Council is working to undertake a full end- to- end test of the services it procures however, this has been challenging. The Council continues to engage with the third party supplier and have recently received a quote to undertake a full DR test, which is under review.</p> <p>The small scale tests undertaken to date have taken far longer and have been more complex than was envisaged. This has reduced confidence in the ICT service.</p> <p>It is our intention to undertake a full DR test on an annual basis. However, as the small scale tests have been problematic, this has not been possible to date.</p> <p>As part of the project to replace the Council’s on premise SAN, the Council is improving the resilience of hosted services by extending our replication of data. Our on-going move of service to Cloud infrastructure will reduce the Council’s risk profile over time.</p>	2	5	10
<p>Risk Owner: Head of Paid Service and Service Area Leads.</p>	<p>Action Owner: Director, Digital Transformation.</p>	<p>Portfolio Flag: Finance, Governance and Performance.</p>			<p>Strategy Theme: Our Organisation.</p>				

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<p>CRR27: Capital Transport Programme Delivery</p> <p>Management of the overall transport capital programme is key to ensuring we deliver against mayoral priorities in the most cost and time efficient way possible. Failure to do so negatively impacts the council's reputation and finances and makes the council less likely to reduce congestion, air pollution and inequality.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • Overspend on individual schemes leading to uncontainable cost pressures. • Underspend on annual profile. • Lack of coordination and programme management across divisions. 	<p>Transport Programme Team and Delivery Board established.</p> <p>Shared paperwork and highlight reporting process initiated.</p> <p>Regular briefings and reporting to senior management and cabinet members.</p> <p>5 year capital programme mapping process underway.</p>	↑	3	3	9	<p>Working with Transport Planning Team (TPT) and other managers to develop systems further engaging with Directors of Economy of Place and Management of Place, to develop proposals for overall improved management of capital programme and recruitment of appropriate resource levels.</p> <p>We continuing to develop Transport Planning Team (TPT), Transport Development Board (TDB) and highlight report processes which are governed by the Growth and Regeneration (G&R) Board (monthly meeting).</p> <p>5 Year mapping ongoing, 19/20 programme mapped and ongoing.</p> <p>We continuing to develop Transport Planning Team (TPT), Transport Development Board (TDB) and highlight report processes which are governed by the Growth and Regeneration (G&R) Board (monthly meeting).</p>	2	3	6
Risk Owner: Executive Director Growth and Regeneration.	Action Owner: Director Economy of Place.	Portfolio Flag: Communities.			Strategy Theme: Our Organisation, Wellbeing.				

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<p>CRR29: Information Security Management System (ISMS)</p> <p>There is a risk that if the council does not have an Information Security Management System then it will not be able to effectively manage Information Security risks.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • Ineffective Information Security Management System, inadequate resources to create and maintain an ISMS, management buy in and support to operate an ISMS 	<p>We have worked with Information Governance Board (IGB) and ICT on introducing and/or designing an ISMS aligned to ISO 27001.</p> <p>The Information Assurance Team have started a procurement process to design and deliver a new information security management system.</p>	↔	4	5	20	<p>Information Assurance are continuing to work with ICT and IGB on implementing an Information Security Management System.</p>	1	5	5
Risk Owner: Senior Information Risk Owner (SIRO).	Action Owner: Senior Information Risk Owner (SIRO) and Statutory Data Protection Officer (SDPO).	Portfolio Flag: Finance, Governance and Performance.			Strategy Theme: Our Organisation.				

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<p>CRR30: Failure to deliver Bristol City Council's wider Clean Air Plan (excluding traffic clean air zone) Communication/engagement with stakeholders does not result in sufficient behavioural change.</p> <p>We are unable to deliver actions committed to by Mayor in the wider Clean Air Plan (excluding Traffic Clean Air Zone) - which is addressed in Management of Place service area.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • Staff capacity. • Procurement risks. • Lack of resources. • Unable to secure political agreement. • Unable to secure stakeholder buy in in the time available. 	<p>Measures have been developed and will form part of the Clean Air Plan. Mayors Speech June 2019 announced some of these as policy commitments (Mayors Office).</p> <p>Officers undertake initial works and the Mayor's Report was presented to Full Council 17th July 2019.</p> <p>Officers are working on the plan. Staff and consultancy resources are in place.</p> <p>Stakeholder engagement plan is in place and being implemented. Timetable remains very challenging.</p> <p>Mayor led Environment Sustainability Board being set up to oversee Climate Plan. 1st Meeting 10th July 2019.</p> <p>A proposal to allocate £250k of reserves has been approved by G&R EDM and CLB, and has now been approved by Cabinet.</p>	<p>↑</p>	2	5	10	<p>Measures have been finalised and implementation plans are being developed.</p> <p>Staff being allocated to complete the work.</p> <p>Commissioning consultants have been engage to help develop the Bristol Climate Strategy.</p> <p>Engagement plan with stakeholders is being implemented.</p>	1	3	3
Risk Owner: Executive Director Growth and Regeneration.	Action Owner: Climate Change & Sustainable City Manager	Portfolio Flag: Strategic Planning and City Design			Strategy Theme: Wellbeing				

Corporate Risk Register as at December 2019 – Opportunity Risks to the achievement of Bristol City Councils Objectives.									
Risk title and description	What we have done	Performance	Current Risk Level			What we are doing	Tolerance Risk Level		
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<p>OPP1: One City Approach</p> <p>The One City Approach will offer a new way to plan strategically with partners as part of a wider city system.</p> <p>Key potential causes:</p> <ul style="list-style-type: none"> • Mayoral aspiration and widespread partner sign-up to the principle. • Work to date has produced outline plan and engaged partners in the long-term vision and necessary work to complete the plan. 	<p>We have Launched the One City Plan v1 in January 2019.</p> <p>We have funded the core City Office staff team for 2019/20 (April 2019).</p> <p>We appointed to the Head of City Office role, 2x Operational and Stakeholder Engagement Managers, a SDG Coordinator and a sequence of interns, work experience and external offers of resourcing to support the initiatives.</p> <p>We have established all One City Boards.</p> <p>We have agreed the top three priority One City projects for 19/20 and are actively supporting these.</p> <p>Aligned internal resourcing for One City Plan development with our review of Partnership Policy (see CRR21) to ensure a joined-up approach.</p> <p>Established the leadership framework with a regular meeting pulse and associated governance mechanisms.</p>	↔	3	7	21	<p>Have implemented the citywide governance structure including establishing the Economy Board, Environment Board and the associated city Climate Advisory Committee. All boards have now met and are refreshing their contributions to the One City Plan.</p> <p>The City Office has engaged a sponsorship expert to scope potential opportunities for future funding. Project activity will also be supported by the 100,000 Euros awarded to One City as a prize-winner for European Capital of Innovation.</p> <p>Producing One City Plan for v2 in January 2020.</p>	4	7	28
Risk Owner: Head of Paid Service.	Action Owner: Director Policy, Strategy and Partnerships.	Portfolio Flag: Mayor.			Strategy Theme: Our Organisation.				

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<p>OPP2: Corporate Strategy</p> <p>The approved Corporate Strategy presents an opportunity to fundamentally refresh and strengthen our business planning, leadership and performance frameworks.</p> <p>Key potential causes:</p> <ul style="list-style-type: none"> • Approved Corporate Strategy provides the foundation and direction for the organisation. 	<p>We have approved and adopted the Corporate Strategy, Business Plan 18/19 and Performance Framework 18/19 through appropriate Decision Pathways.</p> <p>Re-launched and completed 'My Performance' reviews for all colleagues including annual objective setting linked to the Corporate Strategy and Business Plan 18/19.</p> <p>Designed and launched an integrated business planning approach for 2019/20, linking financial planning, service planning, Risk Management and performance management more closely and from an earlier starting point.</p> <p>The LGA Corporate Peer Challenge completed, providing fresh learning opportunities to improve our approach.</p> <p>Leadership Framework introduced and senior management posts recruited against it.</p>	↔	4	7	28	<p>Running an integrated business planning approach for 2020/21, linking financial planning, and service planning and performance management more closely and from an earlier starting point.</p> <p>Following up roll-out of iTrent for performance.</p>	4	7	28
Risk Owner: Head of Paid Service.	Action Owner: Director Policy, Strategy and Partnerships.	Portfolio Flag: Finance, Governance and Performance.			Strategy Theme: Our Organisation.				

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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>OPP3: Devolution</p> <p>Should the potential arise for opportunities from a region’s devolving, second devolution deal that could lead to an opportunity to align the Council’s corporate priorities and strengthen regional partnership working.</p> <p>Key potential causes:</p> <ul style="list-style-type: none"> • Potential development of second devolution deal. 	<p>We have continued engagement with WECA; but with recognition that focus has been placed more on a proposed housing fund. The national uncertainty around long term government funding and approach has decreased the opportunity slightly (Q1 19/20), but this has recovered given the opportunity around a potential 'powerhouse' for the West of Britain, which has early positive momentum. (Q2 19/20)</p> <p>We have commissioned work to investigate the potential for a Western Powerhouse, a cross-border, cross-sector partnership akin to the Northern Powerhouse or Midlands Engine.</p> <p>We worked with partners to establish a cross-border economic powerhouse for western England and south Wales, the Western Gateway, an entity similar to the well-established Northern Powerhouse.</p>	↔	3	5	15	<p>We will continue to engage with WECA at strategic level.</p> <p>We will continue to engage with HM Government following suggestion that more devolution opportunities may be available following Brexit, including specific spending review asks and engagement on the Western Powerhouse proposal.</p> <p>We are establishing a Secretariat for the proposed western powerhouse and will continue to engage partners and HM Government on this project.</p>	3	7	21
Risk Owner: Head of Paid Service.	Action Owner: Director Policy, Strategy and Partnerships.	Portfolio Flag: Finance, Governance and Performance.			Strategy Theme: Our Organisation.				

Corporate Risk Register as at December 2019 – Opportunity Risks to the achievement of Bristol City Councils Objectives.									
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>OPP4: Brexit.</p> <p>If exiting the European Union provides benefits, such as increased domestic concentration of power, this may lead to opportunities for this to be harnessed at a local or regional level.</p> <p>Key potential causes for enhancing and exploiting:</p> <ul style="list-style-type: none"> • Exiting the European Union. 	<p>Undertaken an internal assessment of threat and opportunities following an externally-provided workshop, publishing our No Deal Scenario Assessment and updated it in Q2 2019.</p> <p>Established a city Brexit Response Group and met since 2016.</p> <p>Met Michel Barnier in Brussels with the Core Cities.</p> <p>Been monitoring the environment; including news of threats from large local employers of leaving UK.</p> <p>Collaborated on draft Inclusive Economic Growth Strategy and Local Industrial Strategy.</p> <p>Participating in MHCLG events and national working group of local authority representatives.</p> <p>We continue to work with Core Cities and M8 leaders on concerted joint efforts.</p> <p>We have formed a Brexit Project Board for internal preparedness and provided fortnightly updates to all Members on preparedness work.</p> <p>We have agreed terms of reference for a Brexit Coordination Group to manage daily operations in the event of a No Deal exit.</p>	↔	1	5	5	<p>We are monitoring the issue on an ongoing basis. We have further meetings of Bristol Brexit Response Group and Brexit Project Board.</p> <p>Continued monitoring of external environment and government relations.</p> <p>Promoting a potential powerhouse for the West of Britain as a post-Brexit opportunity to invest in the region and city.</p>	1	5	5
Risk Owner: Head of Paid Service.	Action Owner: Director Policy, Strategy and Partnerships.	Portfolio Flag: Finance, Governance and Performance.			Strategy Theme: Our Organisation.				

Key External Risk and Civil Contingency Risks to note - Flooding and Brexit

Corporate Risk Register as at December 2019 - External 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>BCCC2: Brexit</p> <p>The risk that Brexit (and any resulting 'deal' or 'no deal') will impact the local economy, local funding and delivery of council services, and that uncertainty around Brexit could impact our ability to accurately assess or plan for potential positive or negative outcomes.</p> <p>Key potential causes are:</p> <ul style="list-style-type: none"> • Exiting the European Union. • Lack of agreed Trade Deal and/or a defined permanent future relationship with the EU. • Unprecedented and complex national / international process. • Lack of planning by the authority. 	<p>We have established and operated a city-wide Bristol Brexit Response Group.</p> <p>Working with Core Cities and M8 leaders on concerted joint efforts, including meeting Michel Barnier.</p> <p>Collaborated on draft Inclusive Economic Growth Strategy and Local Industrial Strategy.</p> <p>Developed a BCC Brexit No Deal Scenario Assessment to inform action planning, then refreshed it in Q2 19/20.</p> <p>Participation in MHCLG events and national working group of local authority representatives.</p> <p>Formed Brexit Project Board to take forward preparedness actions and met consistently to drive progress.</p> <p>Agreed funding for key areas for mitigation work.</p> <p>Established TOR for a Brexit Coordination Group to manage daily activity in a No Deal scenario (Jan 2019) and tested (Mar 2019).</p> <p>Established regular meeting of Brexit Lead Officers from neighbouring authorities and WECA to share approaches and best practice. (Sep 19).</p>	↑	2	7	14	<p>Continue to implement actions identified through No Deal Brexit Scenario Assessment as required. Ongoing.</p> <p>Continued internal Brexit Project Board to oversee BCC preparedness and respond with agility to changing circumstances. Ongoing.</p> <p>Continued monitoring of external environment and government relations. Ongoing.</p> <p>Continue engagement with all relevant government departments and partners to ensure sectoral/organisation risks are communicated and mitigations proactively suggested. Ongoing.</p> <p>Continue to meet with neighbouring Brexit Lead Officers and plan further actions together, including shared initiatives.</p> <p>Taking forward a range of actions set by Brexit Project Board. Ongoing.</p>	2	5	10
Risk Owner: Head of Paid Service.	Action Owner: Director Policy, Strategy and Partnerships.	Portfolio Flag: Finance, Governance and Performance.			Strategy Theme: Our Organisation.				

Corporate Risk Register as at December 2019 - External 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>BCCC1: 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. It provide 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 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: Executive Director Growth and Regeneration.	Action Owner: Director Management of Place, Flood Risk Engineer.	Portfolio Flag: Energy, Waste and Regulatory Services.			Strategy Theme: Our Organisation, Empowering and Caring, Fair and Inclusive, Well Connected, Wellbeing.				

Corporate Threat Risk Performance Summary				Quarter 4 Jan – Mar 19/20		Quarter 1 Apr – Jun 19/20		Quarter 2 Jul - Sept 19/20		Quarter 3 Oct - Dec 19/20		Quarter 4 Jan - Mar 20/21	
Page	Risk ID	Risk	Risk Owner	Rating	Travel	Rating	Travel	Rating	Travel	Rating	Travel	Rating	Travel
4	CRR7	Cyber-Security(Previously Cyber-Attack)	Senior Information Risk Owner (SIRO)	3x7=21	↔	3x7=21	↔	3x7=21	↔	3x7=21	↔		
10	CRR25	Suitability of Line of Business Systems (LOB)	Senior Information Risk Owner (SIRO)	3x5=15	↔	4x5=20	↓	4x5=20	↔	4x5=20	↔		
11	CRR29	Information Security Management System.	Senior Information Risk Owner (SIRO)			4x5=20	New	4x5=20	↔	4x5=20	↔		
7	CRR19	Tree Management	Executive Director Growth and Regeneration	3x5=15	↔	3x5=15	↔	3x5=15	↔	3x5=15	↔		
9	CRR24	Procurement and contract management compliance	Executive Director Resources and Director of Finance (Section 151 Officer)	3x5=15	↔	3x5=15	↔	3x5=15	↔	3x5=15	↔		
3	CRR6	Fraud and Corruption	Executive Director Resources and Director of Finance (Section 151 Officer)	3x5=15	↔	3x5=15	↔	3x5=15	↔	3x5=15	↔		
1	CRR1	Long Term Commercial Investments and Major projects Capital Investment	Executive Director Growth and Regeneration, Executive Director Resources and Section 151 Officer	3x7=21	↔	3x7=21	↔	3x7=21	↔	2x7=14	↑		
10	CRR26	ICT Resilience	Head of Paid Service, service area leads	3x7=21	↔	2x7=14	↑	2x7=14	↔	2x7=14	↔		
9	CRR23	Better Lives Programme	Executive Director, People	2x7=14	↔	2x7=14	↔	2x7=14	↔	2x7=14	↔		
4	CRR9	Safeguarding Vulnerable Children	Executive Director, People	2x7=14	↔	2x7=14	↔	2x7=14	↔	2x7=14	↔		
5	CRR10	Safeguarding Vulnerable Adults	Executive Director, People	2x7=14	↔	2x7=14	↔	2x7=14	↔	2x7=14	↔		
5	CRR12	Failure to deliver suitable emergency planning measures, respond to and manage emergency events when they occur.	Executive Director Growth and Regeneration	2x7=14	↔	2x7=14	↔	2x7=14	↔	2x7=14	↔		
1	CRR3	Asbestos Management	Head of Paid Service and CLB	3x7=21	↔	3x7=21	↔	2x7=14	↑	2x7=14	↔		
2	CRR4	Corporate Health, Safety and Wellbeing	Head of Paid Service and CLB	3x7=21	↔	3x7=21	↔	2x7=14	↑	2x7=14	↔		
12	CRR30	Failure to deliver Bristol City Council's wider Clean Air Plan. Communication/engagement with stakeholders does not result in sufficient behavioural change (excluding traffic clean air zone).	Executive Director Growth and Regeneration					3x5=15	New	2x5=10	↑		
3	CRR5	Business Continuity and Council Resilience	Head of Paid Service / Executive Director Growth and Regeneration	3x5=15	↔	3x5=15	↔	2x5=10	↑	2x5=10	↔		
7	CRR18	The risk of failing to deliver the range of housing to meet Bristol's needs and not realise the ambition to deliver 2000 homes, of which 800 are affordable, per annum by 2020.	Executive Director Growth and Regeneration	2x7=14	↓	2x5=10	↑	2x5=10	↔	2x5=10	↔		
6	CRR13	Financial Framework and MTFP	Director of Finance (Section 151 Officer)	3x5=15	↓	2x5=10	↑	2x5=10	↔	2x5=10	↔		
8	CRR21	General Data Protection (GDPR Compliance)	Senior Information Risk Owner (SIRO)	3x5=15	↔	2x5=10	↑	2x5=10	↔	2x5=10	↔		
6	CRR15	Financial Deficit	Director of Finance (Section 151 Officer)	1x5=5	↔	2x5=10	↓	2x5=10	↔	2x5=10	↔		
11	CRR27	Capital Transport Programme Delivery	Executive Director Growth and Regeneration	3x7=21	New	3x5=15	↑	3x5=15	↔	3x3=9	↑		
8	CRR22	Partnerships Governance	Head of Paid Service	3x3=9	↑	3x3=9	↔	3x3=9	↔	2x3=6	↑		

Corporate risk performance summary for closed / de-escalated risks

Status	Risk ID	Risk	Risk Owner	Quarter 4 Jan – Mar 18/19		Quarter 1 Apr – Jun 19/20		Quarter 2 Jul – Sept 19/20		Quarter 3 Oct - Dec 19/20		Quarter 4 Jan - Mar 19/20	
				Rating	Travel	Rating	Travel	Rating	Travel	Rating	Travel	Rating	Travel
Closed	CRR8	Service Review	Head of Paid Service	2x5=10	Closed								
De -escalated	CRR16	Leadership	Head of Paid Service and CLB	2x5=10	↔	2x5=10	Closed						
De -escalated	CRR17	Strategy Management	Head of Paid Service	1x7=7	↔	1x7=7	Closed						
Merged into CRR1	CRR11	BCC Infrastructure Delivery	Director of Finance (Section 151 Officer) and Executive Director Growth and Regeneration	2x7=14	↔	2x7=14	↔	2x7=14	↔	2x7=14	Closed		

Corporate Risk Performance Summary for Opportunity risks

Page	Risk ID	Risk	Risk Owner	Quarter 4 Jan – Mar 18/19		Quarter 1 Apr – Jun 19/20		Quarter 2 Jul – Sept 19/20		Quarter 3 Oct - Dec 19/20		Quarter 4 Jan - Mar 19/20	
				Travel	Rating	Rating	Travel	Rating	Travel	Rating	Travel	Rating	Travel
13	OPP2	Corporate Strategy	Head of Paid Service	4x7=28	↔	4x7=28	↔	4x7=28	↔	4x7=28	↔		
13	OPP1	One City	Head of Paid Service	4x5=20	↔	4x5=20	↔	3x7=21	↑	3x7=21	↔		
14	OPP3	Devolution	Head of Paid Service	3x5=15	↔	3x5=15	↔	3x5=15	↔	3x5=15	↔		
14	OPP4	Brexit	Head of Paid Service	1x5=5	↔	1x5=5	↔	1x5=5	↔	1x5=5	↔		

Corporate Risk Performance Summary for External and Civil Contingency risks

Page	Risk ID	Risk	Risk Owner	Quarter 4 Jan – Mar 18/19		Quarter 1 Apr – Jun 19/20		Quarter 2 Jul – Sept 19/20		Quarter 3 Oct - Dec 19/20		Quarter 4 Jan - Mar 19/20	
				Travel	Rating	Rating	Travel	Rating	Travel	Rating	Travel	Rating	Travel
15	BCCC2	Brexit	Head of Paid Service	4x5=20	↔	3x7=21	↓	3x7=21	↔	2x7=14	↑		
15	BCCC1	Flooding	Executive Director Growth and Regeneration	3x5=15	↔	3x5=15	↔	3x5=15	↔	3x5=15	↔		

Risk Scoring Matrix

		Threat Impact (Negative risks)					Opportunity Impact (Positive Risk)						
		Almost certain	Likely	Unlikely	Rare	Score	Level	Almost certain	Likely	Unlikely	Rare		
Threat Likelihood	Almost certain	4	4 (Low)	12 (Medium)	20 (High)	28 (Critical)	28 (Significant)	20 (High)	12 (Medium)	4 (Low)	4	Almost certain	
	Likely	3	3 (Low)	9 (Medium)	15 (High)	21 (High)	21 (High)	15 (High)	9 (Medium)	3 (Low)	3	Likely	
	Unlikely	2	2 (Low)	6 (Medium)	10 (Medium)	14 (High)	14 (High)	10 (Medium)	6 (Medium)	2 (Low)	2	Unlikely	
	Rare	1	1 (Low)	3 (Low)	5 (Medium)	7 (Medium)	7 (Medium)	5 (Medium)	3 (Low)	1 (Low)	1	Rare	
			1	3	5	7	7	5	3	1			
			Minor	Moderate	Major	Critical	Exceptional	Significant	Modest	Slight			

Threat Level	Opportunity Level	Level of Risk	Actions Required
1-4	1-4	Low	May not need any further action / monitor at the Service level.
5-12	5-12	Medium	Action required, manage and monitor at the Directorate level.
14-21	14-21	High	Must be addressed - if Directorate level consider escalating to the Corporate Risk Report, if Corporate consider escalating to the Cabinet Lead.
28	28	Critical / Significant	Action required - escalate if a Directorate level risk, escalate to the Corporate Level, if Corporate bring to the attention of the Cabinet Lead to confirm action to be taken.

Current and Tolerance risk ratings: The 'Current' risk rating for both threats and opportunities refer to the current level of risk taking into account any strategies to manage risk - 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.

Positive Risks (Opportunities): Where the risk is an opportunity, a cost benefit analysis is required to determine whether the opportunity is worth pursuing, guided by the score for the matrix, e.g. an opportunity with a score of 28 would be pursued as it would offer considerable benefits for little risk.

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 <i>(Including developing commercial enterprises)</i>	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.