

South Northamptonshire Council

Leadership Risk Register

Monthly Review - as at end of September 2020.

This update will be discussed by SMT on 19 October 2020.

This update will be reported to Cabinet BPM at its meeting on 26 October 2020.

This month's update is the next full report to Members.

What this document is

This document sets out the Council's leadership risks. These are the primary risks to the Council. The attached register explains the risks and their inherent levels, together with mitigating actions being taken to reduce the risks to the residual level shown. The register is reviewed and updated by the Council's Senior Management Team monthly, and reported to Members quarterly.

Audit Committee at its meeting on 30 July 2020 requested that the risk register show how the Council is responding to risks resulting from Covid-19. As of the end of July 2020 update, further information regarding how risks are affected by, and mitigated by Covid-19 are requested in the additional column inserted for each risk.

Changes in risk this month - at a glance

Leadership Risk	Residual Score	Direction of travel	Latest Update
L01 Financial Resilience	12 medium risk	↔	Ongoing impact of Covid-19 continues to affect all Council activities, mitigating actions and comments have been updated as the situation moves rapidly. However risk L03 increased to medium risk in August 2020, as appointments started being made of SNC Officers to the Shadow West Northants Council as this impacted upon our management capacity. With adoption of the Local Plan, risk L04 has been deleted.
L02 Statutory functions	6 Low risk	↔	
L03 Lack of management Capacity	12 Medium risk	↔	
L04 Local Plan	Risk deleted as Local Plan now adopted		
L05 Business Continuity	9 Low risk	↔	
L06 Strategic Community Partners	12 Medium risk	↔	
L07 Emergency Planning	12 Medium risk	↔	
L08 Health & Safety	12 Medium risk	↔	
L09 Cyber Security	15 Medium risk	↔	
L10 Safeguarding the Vulnerable	9 Low risk	↔	
L11 Income generation through council owned companies	9 Medium risk	↔	
L12 Financial sustainability of third party suppliers	12 medium risk	↔	
L13 Local Government Reorganisation	9 Medium risk	↔	
L14 Corporate Governance	4 Low risk	↔	

Level of risk	How the risk should be managed
High Risk (16-25)	Requires active management to manage down and maintain the exposure at an acceptable level. Escalate upwards.
Medium Risk (10 -15)	Contingency Plans - a robust contingency plan may suffice together with early warning mechanisms to detect any deviation from the profile.
Low Risk (1 – 9)	Good Housekeeping - may require some risk mitigation to reduce the likelihood if this can be done cost effectively, but good housekeeping to ensure that the impact remains low should be adequate. Re-assess frequently to ensure conditions remain the same.

Changes in residual risk scores since last month	
	No changes this month. Note risk L04 no longer applies.

Risk Scorecard – Residual Risks						
		Probability				
		1 - Remote	2 - Unlikely	3 - Possible	4 - Probable	5 - Highly Probable
Impact	5 - Catastrophic			L09		
	4 - Major			L03, L07, L12		
	3 - Moderate		L02	L05, L10, L11, L13	L01, L06, L08	
	2 - Minor		L14			
	1 - Insignificant					

Risk Definition	
Leadership	Strategic risks that are significant in size and duration, and will impact on the reputation and performance of the Council as a whole, and in particular, on its ability to deliver on its corporate priorities
Operational	Risks to systems or processes that underpin the organisation’s governance, operation and ability to deliver services

L01 - Financial Resilience – Failure to react to external financial shocks, new policy and increased service demand. Poor investment and asset management decisions.

Inherent risk level		Lead Member - Councillor Peter Rawlinson		Residual risk level	
Probability	4	Risk Owner - Martin Henry		Probability	3
Impact	4	Risk Manager - Denise Taylor		Impact	4
Inherent risk score	16			Residual risk score	12
				Direction of travel	↔
		15/10/20		Mitigating actions and comments	

How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?

Potential impact if risk not mitigated	Controls	Control assessment	Mitigating actions (to address control issues)	Comments
A Reduced medium and long term financial viability	Medium Term Revenue Plan reported regularly to members. Monthly financial monitoring linked to performance monitoring.	Fully	Following recent West Northants Council recruitment, the S151 statutory officer is retained. The Strategic Business Partner has now taken on the role of Temporary Assistant Director of Finance and Procurement. Overall the Finance and Procurement resource provides a highly competent team. Additional resilience and resource for financial accounting and reporting engaged through external partners and agencies.	COVID-19 pandemic is already impacting SNC expenditure and income. The review of services for 2020/21 has identified additional pressures of £2.24m. This position and the cost of recovery (including work backlogs) are being reviewed every month as part of the budget monitoring. Government funding of (£1,663k) has been received and the underspend of (£530k) from the Draft Statement of Accounts 2019/20 and non Covid-19 spend of (£52k) will reduce the remaining pressure to a surplus of (£9k). This incorporates the Central Government grant funding for Fees & Charges and Leisure where the first claim has been made and a forecast incorporated for the remainder of the year. Regular reviews will provide further updates to this position.
B Reduction in services to customers	Efficiency plan in place and balanced medium term	Fully	All potential investments to now be taken through SMT/Committee prior to formal sign off. Robust review and challenge of our investment options to be regularly undertaken through our usual monitoring processes.	
C Continued reliance on central govt funding and therefore reduced opportunity for independent decision making	Highly professional, competent, qualified staff	Partially	Robust monitoring now in place with monthly monitoring agreed with Finance and ED/ADs	
E Reduced financial returns (or losses) on investments/assets	Good networks established locally, regionally and nationally	Fully	Asset Management Strategy to be reviewed and refreshed in the new year. Regular attendance at the Northants Finance Officers Group and other networks.	
F Inability to deliver financial efficiencies	National guidance interpreting legislation available and used regularly	Fully	The Council subscribes to a number of advice lines which provide legislative interpretation and guidance.	

L01 - Financial Resilience – Failure to react to external financial shocks, new policy and increased service demand. Poor investment and asset management decisions.					
Inherent risk level		Lead Member - Councillor Peter Rawlinson		Residual risk level	
Probability	4	Risk Owner - Martin Henry		Probability	3
Impact	4	Risk Manager - Denise Taylor		Impact	4
Inherent risk score	16			Residual risk score	12
		15/10/20		Direction of travel	↔
				Mitigating actions and comments	
					How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?
Potential impact if risk not mitigated	Controls	Control assessment	Mitigating actions (to address control issues)	Comments	
G	Inability to deliver commercial objectives (increased income)	Members aware and are briefed regularly	Fully	Relevant members are briefed on a one to one basis at least once a month. Wider briefings take place where required on new and emerging issues and matters. Member training is organised.	
H	Poor customer service and satisfaction	Participate in Northamptonshire Finance Officers work streams	Fully	Finance support and engagement with programme management processes being implemented.	
I1	Lack of officer capacity to meet service demand	Treasury management policies in place	Fully	Regular involvement and engagement with senior management across county as well as involvement in Regional and National finance forums.	
I2		Investment strategies in place	Partially	Regular member meetings, training and support in place and regularly reviewed. Briefings provided on key topics to members.	
I3		Regular financial and performance monitoring in place	Fully	Robust monitoring now in place with monthly monitoring agreed with Finance and ED/ADs	
I4		Independent third party advisers in place	Fully	Regular utilisation of advisors.	
I5		Regular bulletins and advice received from advisers	Fully	Internal Audits being undertaken for core financial activity and capital.	
I6		Property portfolio income monitored through financial management arrangements on a regular basis	Fully	Robust Property portfolio income monitoring now in place with monthly monitoring agreed with Finance and ED/ADs	

L02 - Statutory functions – Failure to meet statutory obligations and policy and legislative changes are not anticipated or planned for.

Inherent risk level		Lead Member - Councillor Ian McCord		Residual risk level	
Probability	3	Risk Owner - Richard Ellis		Probability	2
Impact	4	Risk Manager - Andrew Hunkin		Impact	3
Inherent risk score	12			Residual risk score	6
				Direction of travel	↔

14/10/20

How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?

Potential impact if risk not mitigated	Controls	Control assessment	Mitigating actions (to address control issues)	Comments	
A1 Legal challenge	Embedded system of legislation and policy tracking in place, with clear accountabilities, reviewed regularly by Directors.	Partially	Establish corporate repository and accountability for policy/legislative changes	A corporate repository has been set up by the MO who has overall accountability for policy / legislative change. EDs and ADs address potential policy / legislative changes through a DMT standard agenda item.	Covid-19 has resulted in a number of new statutory instruments and Acts being published - all of which have been adopted.
A2	Clear accountability for responding to consultations with defined process to ensure Member engagement	Fully	Clear process for managing consultations	Consultations are coordinated by the Performance and Transformation Team. Countywide exercises are managed by the Strategic Marketing and Communications Team and specific exercises are managed by the most relevant service (e.g. the Finance service is responsible for the future funding consultation exercises). SMT and Member involvement is	No direct Covid-19 impact.
B1 Loss of opportunity to influence national policy / legislation	National guidance interpreting legislation available and used regularly	Fully	Establish access to systems / organisations that identify and interpret legislation	The Executive Director: Resources is a member of the Lawyers in Local Government organisation, that publishes weekly updates /reviews on legislative changes /best practice. He and the Solicitor also have access to services such as Thomson Reuters and organisations such as EM Lawshare.	No direct Covid-19 impact.
B2	Risks and issues associated with Statutory functions incorporated into Directorate Risk Registers and regularly reviewed	Partially	Review strategic / service risk registers	Leadership risk register fully reviewed for 19/20 year. As functions separate, specific risk registers have been reviewed and updated. Strategic risk / leadership risk registers are regularly reviewed by SMT, Audit Cttee and Scrutiny Cttee. DMTs regularly review service risk registers.	Covid-19 has had an impact on service risk registers and this is being dealt with through the review of corporate plan actions and a review of staffing resources.
C1 Financial penalties	Clear accountability for horizon scanning, risk identification / categorisation / escalation and policy interpretation in place	Partially	SMT fully engaged	SMT receives a wide variety of reports/information to ensure that it gives its attention to strategy and horizon scanning. To ensure that SMT is fully sighted on all items, it has compiled an SMT tracker that links into the committee and BPM forward plans.	No direct Covid-19 impact.
C2	Robust Committee forward plans to allow member oversight of policy issues and risk management, including Scrutiny and Audit	Partially	Ensure committee forward plans are reviewed regularly by senior officers	To ensure that SMT is fully sighted on all items, it has compiled an SMT tracker that links into the committee and BPM forward plans.	No direct Covid-19 impact.
C3	Internal Audit Plan risk based to provide necessary assurances	Partially	Ensure Internal Audit plan focusses on key leadership risks	Internal Audit Plan is approved and monitored by SMT and the Audit Cttee	Covid-19 has had some impact on the implementation of some internal audit recommendations (GDPR). These have been recalibrated and reported to the Audit Cttee.
C4	Strong networks established locally, regionally and nationally to ensure influence on policy issues	Fully	Develop stakeholder map, with Director responsibility allocated for managing key relationships	To be completed by 31 December 2020.	Covid-19 has led to a delay in implementing the mitigating action - but all responsibilities are known and understood: just not mapped.
C5	Senior Members aware and briefed regularly in 1:1s by Directors	Partially	Standardise agendas for Director / PFH 1:1s	CE, EDs and ADs have regular meetings with the relevant portfolio holders and use a template has been compiled that formalises and records more comprehensively those meetings.	No direct Covid-19 impact.

L03 - Lack of Management Capacity – Loss of key Directors/ADs and limited ability to recruit reduces capacity at management level

Inherent risk level		Lead Member - Councillor Ian McCord	Residual risk level	
Probability	4	Risk Owner - Richard Ellis	Probability	3
Impact	4	Risk Manager - Andrew Hunkin	Impact	4
Inherent risk score	16		Residual risk score	12
			Direction of travel	↔
		14/10/20		Comments updated

How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?

Potential impact if risk not mitigated	Controls	Control assessment	Mitigating actions (to address control issues)	Comments	How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?
A1 Financial impact due to use of agency staff, possible impact on customers and frontline service delivery if capacity risks are not managed.	Succession planning for key roles	Fully	Resilience training programme for Assistant Directors in place. Also, Managers' Forum now in place, developing next in line tier of managers into a more confident cadre (and thinking of succession planning).	Resilience training programme completed. Additional support and training and development identified and promoted through Staff Fayre and the Mgrs' Forum. A People Strategy has been approved by SMT for discussions with the unions prior to general circulation and promotion. The Learning and Development Programme has been developed with LGSS HR; and the courses available were promoted through the last staff briefings.	Some staff who are spending a considerable time on dealing with Covid-19 may find it difficult to attend training etc. But generally 1:1s are still being held, and most training is available online and can be provided at times to suit the trainee.
A2	Arrangements in place to source appropriate interim resource if needed	Fully	Discussions with Penna to ensure rapid response should interim resource be required	Two of the Executive Directors have been appointed into new roles for the unitary authority. Current SNC roles and responsibilities have been reviewed and re-designated. If the need arises additional interim capacity will be sought.	No direct Covid-19 impact.
B Inability to deliver council's plans	Delegations to Chief Exec and other senior officers agreed to ensure timely decisions	Partially	Review CE and other senior officers' delegations. Keep general staffing levels and critical services under review.	General and emergency delegations have been reviewed and actioned. These will come into force if Members are not in a position to make decisions because of the Coronavirus pandemic. General staffing levels and critical services are being kept under review by the TCG. Recovery plans are being drawn up to deal with backlogs. A review of the Corporate Plan is also being undertaken.	See comments column
C Inability to realise commercial opportunities or efficiencies	Cash flow, income streams and expenditure are stressed at the moment.	Partially	Regular monitoring of the Council's financial position	Regular monitoring will continue through SMT, with Member input as required.	Income stream and reserves have been impacted by Covid-19. Regular monitoring and management of this risk is ongoing.
D Reduced staff morale and uncertainty may lead to loss of good people	Daily programme of internal communication through the Pandemic period. Also a proactive approach to wellbeing	Partially	Daily communications to be delivered by CEO. Wellbeing to be promoted and monitored.	Regular communications are being delivered by CEO. Wellbeing is being promoted and monitored.	See comments column

L05 - Business Continuity – Failure to ensure that critical services can be maintained in the event of a short or long term incident affecting the Council's operations.

Inherent risk level		Lead Member - Councillor Dermot Bambridge		Residual risk level		
Probability	4	Risk Owner - Andrew Hunkin		Probability	3	
Impact	4	Risk Manager - Geoff Kent		Impact	3	
Inherent risk score	16			Residual risk score	9	
				Direction of travel	←→	
		15/10/20			No change	How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?
Potential impact if risk not mitigated		Controls	Control assessment	Mitigating actions (to address control issues)	Comments	
A	Inability to deliver critical services to customers/residents	Business continuity strategy in place	Partially	BC exercise and training delayed by Covid however all services have demonstrated that they have been able to respond to denial of facilities and some service elements. All services have reviewed and updated their BC plans in light of the coronavirus situation and with widespread homeworking now in place we have demonstrated that the plans work. Weekly TCG meetings are held with key staff to monitor the national and local coronavirus picture as well as reference being made to official Government advice.	Covid has demonstrated that all services take BC seriously and have been able to operate to near-normal levels since this start of the crisis in March 2020. TCG continues to meet weekly to review service delivery and deal with revised Government guidance and local events to ensure that our services still operate effectively.	
B	Financial loss	Services prioritised and recovery plans reflect the requirements of critical services	Partially			
C	Loss of important data	ICT disaster recovery arrangements in place	Fully			
D	Inability to recover sufficiently to restore non-critical services before they become critical	Incident management team identified in Business Continuity Strategy	Partially			
E1	Loss of reputation	All services undertake annual business impact assessments and update plans	Fully			
E2		Business Continuity Plans tested	Partially			

L06 - Strategic Community Partners – Financial failure of a public sector partner organisation Failure to build the necessary partnership relationships to deliver our strategic plan. Failure to ensure the necessary governance of third party relationships (council businesses, partners, suppliers).

Inherent risk level		Lead Member - Councillor Ian McCord	Residual risk level	
Probability	4	Risk Owner - Andrew Hunkin	Probability	4
Impact	4	Risk Manager - Geoff Kent	Impact	3
Inherent risk score	16		Residual risk score	12
			Direction of travel	↔
		15/10/20		No change

How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?

Potential impact if risk not mitigated	Controls	Control assessment	Mitigating actions (to address control issues)	Comments	
A Potential reduction in service areas funded by the County Council resulting in an unplanned increase in demand on district functions leading to service difficulties.	Robust governance/contract management framework in place for key third party relationships	Partially	Review existing arrangements/ contracts to ensure appropriate governance	Third party governance review completed. Cllr and Officer appointments to Council owned companies have been reviewed and approved.	All partnering arrangements have worked effectively during the covid crisis.
B Poor service delivery	Robust governance/contract management framework in place for key third party relationships	Partially	Standard agenda item at senior officer meetings	Impact of potential NCC cuts reviewed for all plans and strategy changes proposed and / or made.	
C Inability to deliver council's plans and outcomes for communities	Training and development of senior officers/members to fulfil their responsibilities with partner organisations	Partially	Training plan to be developed with LGSS in early 2020.		
D Legal challenge	Leader and CEO engaging at National and county level to mitigate impacts of potential service reductions for residents	Partially	Engagement with other public bodies.	Ongoing meetings with Chief Execs from across Northamptonshire to agree next steps for Unitary approach	
E Financial loss	Regular review and sharing of partnership activity/engagement at senior officer meetings	Partially	Regular discussions at DMT and internal Northants LGR meetings.		
F Inability to partner in the future				Ongoing meetings with wider health partners to ensure evidence based approach to investment in Wellbeing Directorate Services	
G Reduced opportunity for inward investment in the future					

L07 - Emergency Planning – Failure to ensure that the local authority has plans in place to respond appropriately to a civil emergency fulfilling its duty as a category one responder.

Inherent risk level		Lead Member - Councillor Dermot Bambridge		Residual risk level		
Probability	4	Risk Owner - Jane Carr		Probability	3	
Impact	4	Risk Manager - Geoff Kent		Impact	4	
Inherent risk score	16			Residual risk score	12	
				Direction of travel	↔	
		15/10/20			No change	
Potential impact if risk not mitigated		Controls	Control assessment	Mitigating actions (to address control issues)	Comments	How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?
A	Inability of council to respond effectively to an emergency	Key contact lists updated monthly.	Partially	There is a specific, fully trained SNC employed member of staff covering emergency planning as part of their job role. Emergency Plan Part B and Wallet Guides have been updated this month.	Active plans are in place to ensure the authority is prepared for a variety of emergencies. Continual improvements are being made as a result of a review of these plans and in partnership with the Local Resilience Forum. Regular meetings are taking place of the Northants LRF, and at SNC internally to ensure that we respond proactively to the Covid-19 as it changes.	A high level multi-agency response to covid has been in place since March 2020 where senior staff from all agencies meet weekly and high level data, information and guidance is then shared with the Council and the community.
B	Unnecessary hardship to residents and/or communities	Dedicated Emergency Planning Officer in post to review, test and exercise plan and to establish, monitor and ensure all elements are covered	Partially	Active participation in LRF response to Covid-19 situation		
C	Risk to human welfare and the environment	Added resilience from cover between shared Environmental Health team, shared Environmental Services & SNC Housing Team s officers with appropriate skill (Bronze Incident Liaison Officers)	Fully	Desktop emergency planning exercise undertaken by Senior Managers in June 2019		
D	Legal challenge	Senior management attend Civil Emergency training	Fully	Training for senior officers was last undertaken in June 2019.		
E	Potential financial loss through compensation claims	Multi agency emergency exercises conducted to ensure readiness	Fully	Senior managers have attended duty manager training .		
F1	Ineffective Cat 1 partnership relationships	All officers that are involved in emergency responses are trained for their roles	Fully	The Inter Agency Group has met regularly to review readiness for large events		
F2		Full participation in Local Resilience Forum (LRF) activities	Fully	SNC is represented at the Local Resilience Forum		

L08 - Health and Safety – Failure to comply with health and safety legislation, corporate H&S policies and corporate H&S landlord responsibilities.					
Inherent risk level	Lead Member - Councillor Peter Rawlinson		Residual risk level		
Probability	5	Risk Owner - Martin Henry	Probability	4	
Impact	4	Risk Manager - Staci Courtney	Impact	3	
Inherent risk score	20		Residual risk score	12	
			Direction of travel	↔	
	15/10/20			G9, g15, H11	How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?
Potential impact if risk not mitigated	Controls	Control assessment	Mitigating actions (to address control issues)	Comments	
A Fatality, serious injury & ill health to employees or members of the public	New health & safety corporate arrangements and guidance being updated. Robust risk assessment process, that is suitable and sufficient. Risk Assessments identify risks and suitable control measures.	Partially	The Corporate Health, Safety and Wellbeing Policy has been developed following restructure; and has been ratified and signed. An Action Plan has also been drafted and agreed. Managers to assess own department risk assessments to ensure they are suitable, sufficient, up to date and identify all risks.	SMT scheduled to receive regular updates from Senior H&S Officer. H&S Policy for stand-alone SNC has now been ratified and signed. H&S Champion is now Executive Director Finance. Updated Corporate Arrangements have been drafted that reflect the current structure. Corporate Action Plan developed, agreed and is currently being reviewed. All Corporate arrangements needed updating. 47 of them have been RAG rated to prioritise those that are higher risk. Now working with Future Northants to create a set of document for the new unitary. COVID-19 has added a new risk to H&S for employees and members of the public. This is being managed by TCG, which H&S feeds into via Mike Carter. An annual plan has been created by the senior H&S officer. This has been presented to SMT who have signed off and taken responsibility for. Next stage is for it to be taken to audit committee. Annual plan signed off at audit committee (sept 2020) SMT H&S champion now Andrew Hunkin. ALL corporate arrangements are being rewritten to prepare for future northants.	
B Criminal prosecution for failings	Robust Health & Safety policies and Corporate H&S arrangements in place as part of an Integrated H&S Management System	Partially	All Assistant Directors to complete a H&S Checklist to provide a status on the management of H&S in their service areas following ratification of the new checklist format. Actions to be formalised into service plans & monitored at DMT Meetings. This Action need to be changed and agreed by SMT, and consideration of the risk rating updated. This action has been changed and replaced by an annual H&S plan. This plan has been agreed by SMT and will be reviewed monthly by SMT and taken to audit committee.	Directorate H&S Action Plans based on the AD Checklist are being prepared by 31/12/19. Senior H&S officer working with other councils to update policies and procedures in prep for unitary. New date agreed by senior team for directorate action plan. End of Feb 2020 Only one directorate action plan received to date. Environmental Services. This action has not been achieved in the timescales agreed. I recommend that this be discussed by SMT to decide the most suitable way forward. No update received from SMT if this has been discussed. An annual plan has been created based on the gap analysis, audits and assessment by the senior H&S Officer since she started in post in September 2019. This places action and responsibility on Directors and AD to ensure they are put into place to improve and ensure SNC fulfilling legal obligations	
C Financial loss due to compensation claims	Corporate H&S Team in place to provide competent health and safety advice and guidance until SNC recruits a new Health and Safety Officer.	Fully	Senior Health & Safety officer in place at The forum. For 30 hours per week. This is temporarily 37 hours for 6 months in order to get all paperwork updated. Part time Health, Safety & Recycling officer in place at Tove to manage H&S risks in environmental services.	Senior Health & Safety Officer to carry on with Level 6 H&S qualification and H&S Recycling officer to complete IOSH Managing safety course 2020. Due to the amount of workload more resource is required to bring H&S up to standard. Due to COVID-19 an external resource has not been found, it has been agreed that Mike Carter will assist where possible and considering his own workload. Mike Carter doesn't have the capacity to assist. Another options needs to be considered. Still outstanding	Recruiting help has been difficult during COVID. H&S admin help was offered in Nov 2019: still outstanding
D Enforcement action – cost of regulator (HSE) time	Clearly identified accountability and responsibilities for Health and Safety established at all levels throughout the organisation	Fully	The new Health, Safety & Wellbeing policy clearly identifies accountability, responsibility and roles. Presentation given to SMT. Launch as soon as formal sign off at cabinet.	Policy now signed off. This document has not been accessibility checked so is currently not on the intranet. Available on request. Available on the intranet W/c 3/02/2020. Policy is now on the intranet and available. There is still a residual risk that enforcement action will be taken due to the gaps in the safety system. It has been identified that there is a gap in H&S training for managers. Discussion have started with the LGSS training manager to discuss options. A large number of staff have not accessed iLearn so new passwords have been set up to get everyone registered.	
E Increased sickness absence	Directorate Health & Safety Improvement Plans established with embedded reporting and recording arrangements in place	Partially	Corporate arrangements being updated to improve reporting. Annual H&S Plan in place to track improvements. HR to monitor sickness absence to understand the reason for trends. This to be shared to implement a plan to improve.	All directorate have been tasked to carry out gap and plan to improve health & safety in their areas, to be completed end-Dec19. Expected delivery by end of Feb 2020. Still outstanding As mentioned in G10. Still outstanding. Action placed on the annual plan for HR to track sickness absence so the figures can be analysed.	COVID has increased workload for Senior H&S officer so the annual H&S plan was slightly delayed. Plan has been submitted but resulting actions mean more actions to be completed toward the 3rd and 4th quarter
F Increased agency costs	Proactive monitoring of Health & Safety performance management internally	Partially	Good awareness in higher risk areas of the business, e.g. Environmental Services. However other areas need improved awareness of risk assessment process	Audits and inspections planned in for the rest of the year. A formal schedule will be created for 2020 and distributed for visibility. Staff resource and capacity is making Audit and inspections difficult.	Site based inspections were delayed due to COVID. Staff needed to assist were shielding so some had to be done solo. Resulting in some areas not inspected.
G1 Reduction in capacity impacts service delivery	Effective training regime in place for all staff	Partially	All staff to complete H&S training on induction. All other staff will complete H&S elearning organised by L&D.	LGSS have taken over arranging the eLearning training managed through GK. Training review is needed to understand the gaps in H&S training. This data is not held by H&S. SC contacting LGSS to arrange training. It has been found that not all staff are on the new iLearn system. SC working with LGSS to improve numbers. Password resets sent to all employees and reminders sent to managers.	Some training was cancelled due to COVID. Some was moved to eLearning which may not be the best learning style for some staff. Increased cost have been occurred due to the way training has had to be delivered at short notice or reduced numbers.
G2	Positive Health & Safety risk aware culture	Partially	H&S staff to meet with departments to understand culture and do gap analysis.	H&S questionnaire to be carried out in new year to understand what the H&S culture is. H&S officer working with department to improve the awareness of responsibilities under H&S	Action put on hold. Senior H&S officer aware that culture maybe different during this time and doing a survey might not get the real picture.
G3	Corporate Health & Safety meeting structure in place for co ordination and consultation	Fully	Health, Safety & Wellbeing forum to meet quarterly. Currently SMT. Then will be staff representatives. Monthly meetings set up with H&S Champion.	We will seek to make the H&S forum staff rep led mid 2020.	
G4	Corporate body & Member overview of Health & Safety performance via appropriate committee	Partially	Improve communication of H&S across all levels. New KPIs to be agreed and formal reporting through H&S forum.	Health, Safety & Wellbeing forum set up - to consult with stakeholders. First met 7th Nov. Quarterly Meetings scheduled.	
G5	Assurance that third party organisations subscribe to and follow Council Health & Safety guidelines and are performance managed where required	Partially	Full audit of process and management of third parties. To include Tendering, management & performance management.	Full assessment to be carried out of control of Third parties. 2020. Working with Library and CSN to ensure compliance	COVID has halted progress on this. Facilities manager has left SNC

L09 - Cyber Security - If there is insufficient security with regards to the data held and IT systems used by the councils and insufficient protection against malicious attacks on the council's systems then there is a risk of: a data breach, a loss of service, cyber- ransom.

Inherent risk level		Lead Member - Councillor Andrew Grant		Residual risk level	
Probability	4	Risk Owner - Richard Ellis		Probability	3
Impact	5	Risk Manager - Geoff Kent and David Spilsbury		Impact	5
Inherent risk score	20			Residual risk score	15
				Direction of travel	↔
		15/10/20			Mitigating actions updated

How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?

Potential impact if risk not mitigated	Controls	Control assessment	Mitigating actions (to address control issues)	Comments	How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?
A Service disruption	File and Data encryption on computer devices	Fully	We have cyber-essentials plus certification.	Cyber security incidents are inevitable. To manage this risk we have effective controls and mitigations in place including audit and review.	With remote working becoming the norm with the start of the covid crisis, IT have increased efforts to ensure that the Council's data is secure. Multi-factor authentication is now being rolled out and has already been implemented for the highest risk (of cyber attack) groups of senior managers then planning, before the rest of the organisation. Members are now being given refresher training remotely on GDPR in addition to this.
B Financial loss / fine	Managing access permissions and privileged users through AD and individual applications	Fully			
C Prosecution – penalties imposed	Consistent approach to information and data management and security across the councils	Fully			
D Individuals could be placed at risk of harm	Effective information management and security training and awareness programme for staff	Fully	IT were trained in cyber security in late 2018 followed by all staff in early 2019. The Govt has given us funding for further training; the provider has been identified, this will be virtual training rolled out to both staff and Members from July 2020.		
E Reduced capability to deliver customer facing services	Password security controls in place	Fully	Implemented the intrusion prevention and detection system. Multi-factor authentication rolled out in Sep20 for all users, to add additional security to Council system and data access. Members being onboarded by end-Oct20.		
F Unlawful disclosure of sensitive information	Robust information and data related incident management procedures in place	Fully	Agreed Terms of Reference, re-implemented the security forum as the Information Governance Group, first met 10/10/19 then quarterly meetings, chaired by the Information Governance Manager.		
G Inability to share services or work with partners	Appropriate robust contractual arrangements in place with all third parties that supply systems or data processing services	Fully	As above, cyber security training is being rolled out as will GDPR update training for all staff		
H1 Loss of reputation	Appropriate plans in place to ensure ongoing PSN compliance	Fully	Cyber Security issues regularly highlighted to all staff in Staff Times and weekly update emails from CEO		
H2	Adequate preventative measures in place to mitigate insider threat, including physical and system security	Partially	External Health Check undertaken January 2020, no high risk security issues highlighted. Cookiebot live on website for users to confirm cookie preferences.		
H3	Insider threat mitigated through recruitment and line management processes	Fully	Additional IT security advice provided for all staff during the Covid-19 working at home period including online coronavirus related scams		
H4	Cookie pop-ups on the website	Partially	Internal Audit completed a cyber audit in June 2020 with no major issues or significant risks identified. The findings have an agreed action plan in place.		
H5	Increased threat to security during Covid-19 period in part due to most staff working from home.	Fully	New joint OCC/CDC Cyber Security Officer now in post.		

L10 - Safeguarding the vulnerable (adults and children) - Failure to follow our policies and procedures in relation to safeguarding vulnerable adults and children or raising concerns about their welfare.					
Inherent risk level	Lead Member - Councillor Ian McCord		Residual risk level		
Probability	3	Risk Owner - Jo Barrett	Probability	3	
Impact	4	Risk Manager - Pete Cox	Impact	3	
Inherent risk score	12		Residual risk score	9	
	14/10/20		Direction of travel	↔	
				Mitigating actions, comments and covid effects updated	How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?
Potential impact if risk not mitigated	Controls	Control assessment	Mitigating actions (to address control issues)	Comments	
A Increased harm and distress caused to vulnerable individuals and their families (failure to achieve full compliance on Section 11 return).	Safeguarding lead in place and clear lines of responsibility established	Fully	Designated Safeguarding Lead role is now incorporated into the new SNC standalone structure. The SNC Healthy Communities Team includes an AD Well-Being, Community Resilience Officer and a Safeguarding Officer.	The new SNC Safeguarding policy will be taken to the next OD & Personnel Committee when it takes place. Also a separate SNC Safeguarding Leads meeting has been set up with champions in key service areas. Strategic discussion took place at SMT for 3rd February on Safeguarding to consider the Section 11 return info and NASB self-assessment tool. SMT agreed that it wants to contribute towards the organisational safeguarding action plan, make safeguarding more visible in the organisation and embedded in the organisational culture. SMT will now receive quarterly reports on safeguarding. First quarterly report to SMT on 18.05.20. This report was also taken to Cabinet BPM for awareness and to raise the profile of safeguarding with elected members. Second SMT report on safeguarding produced and considered at SMT meeting on 13.07.20. Safeguarding Officer is now offering safeguarding training (e-learning/voluntary & community groups and parish councils. New Safeguarding Officer commenced in role in September. The officer has substantial experience in safeguarding in an educational setting so is currently getting up to speed on the local government environment.	Remote working has increased the risk of safeguarding issues, however the safeguarding lead officer has ensured that this issue remains high profile, and this is including the rollout of training to partner organisations that can act as our eyes and ears in the community. New Safeguarding Officer is building on their comprehensive knowledge of mental health issues and exploring roll out of mental health first aid awareness and training across workforce to enhance safeguarding awareness, skills and knowledge for SNC staff and customers.
B Council could face criminal prosecution (failure to achieve full compliance on Section 11 return).	Safeguarding Policy and procedures in place	Fully	Updated SNC Safeguarding Policy has been considered by SMT and approved (13 Jan 2020). Report taken to SMT & Cabinet BPM (May 20) reporting progress to date on Action Plan that sits alongside the new safeguarding policy. The in-house Safeguarding Officer is providing training to all SNC staff (new & existing) and elected members. All staff are provided with a copy of the policy and required to sign a declaration that they have read it. SNC's in-house training programmes are currently being assessed for accreditation/CFD registered. Ongoing internal awareness campaigns. SIRI mechanism has been updated since separation. Healthy Communities Team have procured a specific safeguarding software package to improve case management, monitoring & reporting. New Safeguarding Officer currently completing 6 month policy review to see if any changes are required and any areas need to be refreshed.		
C Criminal investigations potentially compromised (failure to achieve full compliance on Section 11 return).	'See it, Report it' mechanism in place to be used as/when a member of staff identifies a safeguarding concern	Fully	SIRI mechanism has been updated since separation. Healthy Communities Team have procured a specific safeguarding software package to improve case management, monitoring & reporting. New software enables any relevant documentation to be uploaded. This means all relevant information is held in one secure place (case management system) and available should it be required in a future criminal investigation. Every member of staff will complete annual refresher training as well as full training at the required level every 3 years. Training will be offered to all elected members in 2020/21. Elected member training session took place on 6 July 2020.		
D1 Potential financial liability if council deemed to be negligent	Staff Safeguarding Training Framework in place	Partially	See comments above. Training requirements are managed through a database which flags updates through a red, amber, green system.		
D2	Safer recruitment practices and DBS checks for staff in regulated roles.	Fully	Safeguarding Officer has worked with LGSS to review safer recruitment practices and DBS check process and these are now embedded in the new recruitment & selection policy (waiting for this to be approved).		
D3	Membership of the Child Exploitation Sub Group	Fully	Safeguarding Officer attends Child exploitation groups on a monthly basis.		
D4	Local Safeguarding Children and Adults Board Northamptonshire pathways and thresholds observed	Fully	Safeguarding Officer keep up to date on Northants Safeguarding pathways and thresholds and refers to these when considering or making a referral.		
D5	Representation on the Northamptonshire Safeguarding Boards (children and adults)	Partially	Liaising with Adults Safeguarding Lead at NCC to be invited to attend NSAB. Representation on NSCB is via membership of the child exploitation sub-group.		
D6	Annual Section 11 return compiled and update report sent to NCC as requested (NSCB did not want a formal S11 return)	Fully	Healthy Communities Team has completed Section 11 return info & NSAB Self-Assessment Audit in January 2020.		
D7	Chair the South Northants/Daventry Multi-Agency Risk Assessment Conference (MARAC)	Fully	Community Resilience Officer chairs MARAC for South Northants/Daventry and provides support to Northampton as well.		
D8	Safeguarding included as factor for consideration as part of tendering process	Partially	Safeguarding Officer has worked with the procurement team to ensure safeguarding is considered as part of the tendering process for now contracts.		
D9	Contracts with service providers include safeguarding expectations and right to audit where relevant	Partially			
D10	Monitoring of commissioned providers to ensure adequacy of safeguarding arrangements	Partially	Safeguarding Officer has completed a safeguarding review of the contract SNC has with Parkwood (in 19/20). Reviews to be completed in 20/21 are: Parkwood; Grand Union Housing Group. Safeguarding Officer to explore if reviews are possible of organisations that SNC has large grant agreements with (CAB; SNVB). Assessments of applications for Community Funding will include audit of safeguarding policies/procedures.		

		L11 - Income Generation through council owned companies				
Inherent risk level		Lead Member - Councillor Peter Rawlinson		Residual risk level		
Probability	3	Risk Owner - Martin Henry		Probability	3	
Impact	4	Risk Manager - Denise Taylor		Impact	3	
Inherent risk score	12			Residual risk score	9	
				Direction of travel	↔	
		15/10/20			No change	How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?
Potential impact if risk not mitigated		Controls	Control assessment	Mitigating actions (to address control issues)	Comments	
A1	Through failure of governance or robust financial / business planning the councils fail to generate expected income.	Annual business planning	Partially	Support for shareholder and client side capacity regularly reviewed. Relevant training being provided.	New shareholder arrangements in place for SNC.	Robust control and governance remains in place to ensure that income generation is maximised appropriately during the covid crisis, see other financial risks in the leadership risk register
A2		Financial planning	Partially	Resilience and support being developed across business to monitor and deliver projects.		
A3		Corporate governance mechanisms	Partially	Skills and experience being enhanced to deliver and support development, challenge and oversight.		

L12 - Financial sustainability of third party suppliers					
Inherent risk level		Lead Member - Councillor Peter Rawlinson		Residual risk level	
Probability	3	Risk Owner - Martin Henry		Probability	3
Impact	4	Risk Manager - Denise Taylor		Impact	4
Inherent risk score	12			Residual risk score	12
				Direction of travel	↔
		15/10/20			No change
Potential impact if risk not mitigated		Controls	Control assessment	Mitigating actions (to address control issues)	Comments
A1	The financial failure of a third party supplier results in the inability or reduced ability to deliver a service to customers.	Contracts in place to cover default.	Partially	Meetings take place when required with suppliers to review higher risk areas.	Covid-19 pandemic could put additional pressures on suppliers. The Council continues to monitor suppliers financial stability and provision of current contracts.
					How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?
					Careful monitoring of contracts remains to ensure that the Council does not suffer loss of service during the covid crisis.

L13 - Local Government Reorganisation - Proposals for local government reorganisation impacts on the provision of services to residents and communities.

Inherent risk level	Lead Member - Councillor Ian McCord	Residual risk level	
Probability	5	Probability	3
Impact	3	Impact	3
Inherent risk score	15	Residual risk score	9

12/10/20

Direction of travel
↔

Comments and covid effects updated

How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?

Potential impact if risk not mitigated	Controls	Control assessment	Mitigating actions (to address control issues)	Comments	How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?
A Inability to deliver Council priorities and plans, impacting on quality of services delivered to residents and communities.	Leader and CEO engaging at national and county level to mitigate impacts of potential service reductions for residents.	Fully	Standing item at senior officer meetings - regular review of risk and control measures.	The Chief Executive designate has now been appointed, and started in their role on 1/10/20.	LGR continues in the face of covid including a multi agency response. LGR progress is being reviewed at checkpoints in September and December 2020 to ensure that it is able to go ahead, or not in the light of the county-wide covid response. The September review included a helpful range of conclusions, but without any deal-breakers.
B Potential reduction in service areas funded by the County Council resulting in an unplanned increase in demand on district functions leading to service difficulties.	Additional senior leadership resources are in place for SNC.	Fully	Dedicated resource applied - Asst Ch Exec, LGR Finance Lead, and Senior Project Manager		
C Threat to existing joint working partnership initiatives if alternative delivery modes are imposed.	Head of Paid Service in place since 1st October 2018.	Fully	Fortnightly dedicated hour-long sessions for staff directly involved in LGR coordination, supplemented by regular follow-up briefings for next-in-line tier of managers, and Change Champions.		
D1 Potential impact of CDC/SNC separation on quality of services delivered to residents and communities.	Regular review and sharing of partnership activity/engagement at senior officer meetings	Fully	Change Champions recruited amongst front line staff.		
D2	Additional senior management capacity in place to coordinate LGR, supported by a senior project manager, since Jan 2019.	Fully	Close working in place with LGR Workstream staff, working across the eight authorities, but based (p/t) in SNC		
D3	Closely monitoring MHCLG around their gateway review considerations		Contingency plans be developed and ready to roll out pending MHCLG announcement		

L14 - Corporate Governance - Failure of corporate governance leads to negative impact on service delivery or the implementation of major projects providing value to customers. Failure of corporate governance in terms of major projects, budgets or council owned companies impacts upon financial sustainability of the councils, and potentially exposes Council to legal challenge/action.

Inherent risk level		Lead Member - Councillor Ian McCord	Residual risk level	
Probability	4	Risk Owner - Richard Ellis	Probability	2
Impact	4	Risk Manager - Andrew Hunkin	Impact	2
Inherent risk score	16		Residual risk score	4
			Direction of travel	↔

14/10/20

How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?

Potential impact if risk not mitigated	Controls	Control assessment	Mitigating actions (to address control issues)	Comments	How has this risk been affected by Covid-19 and what mitigating actions have you made as a result?
A1 Threat to service delivery and performance if good management practices and controls are not adhered to.	Clear and robust control framework including: constitution, scheme of delegation, ethical walls policy etc.	Partially	Review of constitution to take place following separation	Part 10 of the Constitution (Roles, responsibilities and the scheme of delegation) has been reviewed. The Constitution has also been reviewed to ensure the Council is able to continue to	See Comments column
A2	Clear accountability and resource for corporate governance (including the shareholder role).	Partially	Review accountability and resource for corporate governance (including the shareholder role).	MO has overall accountability for policy / legislative change. Asst CEx has been designated DMO. MO holds the shareholder role.	No direct Covid-19 impact
A3	Integrated budget, performance and risk reporting framework.	Partially	Standing item at senior officer meetings – regular review of risk and control measures	Reporting arrangements have been reviewed. Officers will review monthly, and the relevant committees will review quarterly.	Even more management and monitoring is being done.
A4	Corporate programme office and project management framework. Includes project and programme governance.	Partially	Implementation of corporate programme office	Additional resource in place to support the Northants Local Govt Re-organisation project (LGR).	No direct Covid-19 impact
A5	HR policy framework.	Partially	Full review of HR policy to be undertaken during 20120/21	All of the major HR policies, including a new redundancy policy have been approved at SMT level. The trade unions considered these on 18 September, and they will go the OD and Personnel Committee on 23 October.	No direct Covid-19 impact
A6	Training and development resource targeted to address priority issues; examples include GDPR, safeguarding etc.	Partially	Allocate specific resource to support new projects/policies or statutory requirements e.g. GDPR	Safeguarding Officer recruited. GDPR training arranged.	Covid-19 has had an impact on the resource available to deal with GDPR. Government guidelines on relaxing timelines has been helpful in managing this. In addition some IA recommendations for GDPR have been recalibrated.
A7	Annual governance statements	Partially	Review AGS process and content	AGS process and content has been fully reviewed	No direct Covid-19 impact