

**Gravesham Borough Council**  
**Mid-Year Review of Corporate Risks**  
**(Review of ALL risks detailed in the 2021-2022 Corporate Risk Register)**

Gravesham Borough Councils Corporate Risk Register Outlines the key strategic Risks facing the council and controls that are implemented to manage these risks. It also details any further action required by the council to ensure risks are being sufficiently controlled.

The Risks that were identified and formally approved by Full Council on the 13<sup>th</sup> April 2021, are listed below. These risks have been documented in the 2021-2022 Corporate Risk Register:

**Risk 1: Ongoing financial viability of the Council**

**Risk 2: Changes in national priorities and legislative change**

**Risk 3: Organisational capacity/ resilience**

**Risk 4: Cyberattack resulting in data breach or corruption of data**

**Risk 5: Investment Risk**

This document provides mid-year progress information in respect of the management of each of the above risks. The effectiveness of risk management actions that have been carried out as at mid-year, are assessed as being one of the following:

<b>Good</b>	Actions in place will mitigate the risk and no further action is required.
<b>Satisfactory</b>	Whilst the action will help to mitigate the risk, there is still further work that can be undertaken to further mitigate the risk.
<b>Inadequate</b>	The action is either not already in place or is not mitigating the risk and therefore further work is required.

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<b>The Risk</b>					<b>Ongoing financial viability of the Council</b>					<b>Risk No.</b>		<b>1</b>					
<b>Link to Corporate Objective</b>					# <b>Progress</b> An entrepreneurial authority; commercial in outlook and committed to continuous service improvement, underpinned by a skilled workforce and strong governance environment												
<b>Review Date</b>					October 2022												
<b>Cabinet Portfolio</b>					Leader of the Executive (but affects all portfolios)												
<b>Risk Owner(s)</b>					Director (Corporate Services); Assistant Director (Corporate Services)												
<b>INHERENT RISK SCORE</b>					<b>RESIDUAL RISK SCORE</b>					<b>TARGET RISK SCORE</b>							
<b>Likelihood</b>	5	<b>Impact</b>	4	<b>Score</b>	20	<b>Likelihood</b>	4	<b>Impact</b>	4	<b>Score</b>	16	<b>Likelihood</b>	3	<b>Impact</b>	3	<b>Score</b>	9

Trigger	Consequences
Financial Challenges due to changes in government legislation and posed by the COVID-19 Pandemic, leading to increased financial pressure on the budget. Single year finance settlement for 2022/23 leaving uncertainty as to how local government will be funded in future years. Central Government Finance reforms have been put on hold (fair funding review, business rates retention and future of new homes bonus).	<ul style="list-style-type: none"> <li>• Difficult decisions around funding of services and quality of services compromised</li> <li>• Inability to plan effectively for future years.</li> <li>• Traditional income generating activity has reduced (such as car parking income and investment income) as a result of the COVID -19 Pandemic.</li> <li>• Council not being able to meet its statutory obligations due to lack of funding</li> <li>• Uncertainty of funding for the authority and for future projects</li> <li>• Changes in legislation have a negative financial impact on the Council.</li> <li>• Impact on minimum reserve limits.</li> </ul>

Controls to eliminate, reduce or transfer risk	Lead Officer	Management Action Update as at Mid-Year Review	Quarterly Risk Assessment			
			Q1	Q2	Q3	Q4
1.1 Effective Budget Monitoring	Director ( Corporate Services) Assistant Director (Corporate Services)	<ul style="list-style-type: none"> <li>• Quarterly budget monitoring is established in the committee cycle for presentation to the Finance and Audit Committee and The Cabinet.</li> <li>• Monthly budget monitoring reports are sent to budget holders</li> </ul>				
1.2 Medium Term Financial Plan in place.	Director (Corporate Services) Assistant Director (Corporate Services)	<ul style="list-style-type: none"> <li>• The Medium-Term Financial Plan remains in place and is updated and monitored on a regular basis</li> </ul>				
1.3 Ongoing monitoring of Medium Term Financial Plan (MTFP).	Director (Corporate Services) Assistant Director (Corporate Services)	<ul style="list-style-type: none"> <li>• The Medium-Term Financial Plan is continually monitored to ensure it is current and that the authority is aware of its financial position. In addition to the quarterly budget reporting further MTFP's were presented at Cabinet and May and October to show the impact of increasing financial pressures.</li> <li>• In response to the emerging budget gap officers have been proactive and have put together a medium term financial strategy and</li> </ul>				

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		workstreams to help counter the financial pressures / challenges now faced by the council				
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			Q1	Q2	Q3	Q4
1.4 Monitoring of changes in legislation by Officers.	Director (Corporate Services) Assistant Director (Corporate Services)	<ul style="list-style-type: none"> <li>The finance team are kept up to date in changes in legislation by press release and via local government networks and CIPFA</li> </ul>				
1.5 Model effects of any changes in legislation and application of these to the MTFP.	Director (Corporate Services) Assistant Director (Corporate Services)	<ul style="list-style-type: none"> <li>Changes are routinely modelled into the MTFP so that potential impacts is known. A recent example of this is the potential salary increases proposed by unions and the impact of energy cost rises.</li> </ul>				
1.6 Responding to Government Consultations	Director (Corporate Services) Assistant Director (Corporate Services)	<ul style="list-style-type: none"> <li>Consultations are responded to if relevant to the financial impact on this authority.</li> </ul>				

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<b>The Risk</b>					<b>Changes in national priorities and legislative change</b>					<b>Risk No.</b>		<b>2</b>					
<b>Link to Corporate Objective</b>					<p><b>#People:</b> a proud community; where residents can call a safe, clean and attractive borough their home.</p> <p><b>#2 Place:</b> a dynamic borough; defined by a vibrant and productive local economy taking advantage of growth in the area, supported by its strong and active community.</p> <p><b>#3 Progress:</b> an entrepreneurial authority; commercial in outlook and committed to continuous service improvement, underpinned by a skilled workforce and strong governance environment.</p>												
<b>Review Date</b>					October 2022												
<b>Cabinet Portfolio</b>					All portfolios												
<b>Risk Owner(s)</b>					Chief Executive and Management Team												
<b>INHERENT RISK SCORE</b>					<b>RESIDUAL RISK SCORE</b>					<b>TARGET RISK SCORE</b>							
<b>Likelihood</b>	5	<b>Impact</b>	4	<b>Score</b>	20	<b>Likelihood</b>	5	<b>Impact</b>	3	<b>Score</b>	15	<b>Likelihood</b>	4	<b>Impact</b>	3	<b>Score</b>	12

<b>Trigger</b>	<b>Consequences</b>
Changes in national priorities including National Significant Infrastructure Projects (NSIP). Current proposals that affect the Borough are: <ul style="list-style-type: none"> <li>• Lower Thames Crossing (Gravesham)</li> <li>• Thurrock Flexible Generation Plant (Tilbury)</li> <li>• London Resort (Dartford, Gravesham)</li> </ul>	Council may not have the necessary resources to deliver on key projects. Projects may adversely affect local residents
Change (s) in legislation / statutory duties imposed by Central Government such as <ul style="list-style-type: none"> <li>• Local Government Reform</li> <li>• Levelling Up Agenda</li> </ul>	Introduction of new statutory duties could <ul style="list-style-type: none"> <li>• Change the strategic direction of the Council</li> <li>• Result in new statutory duties not being enacted leading to legal challenge</li> <li>• Entail additional workloads for officers</li> <li>• Move to an agile way, directing resources as required</li> <li>• Increase scrutiny by members and the public</li> <li>• change the way existing services are delivered</li> <li>• increase financial pressures (discussed as part of risk 1)</li> </ul>

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Controls to eliminate, reduce or transfer risk	Lead Officer	Management Action Update as at Mid-Year Review	Quarterly Risk Assessment			
			Q1	Q2	Q3	Q4
2.1 Circulation of monthly briefings to key officers	<b>Wider Management Team</b>	<ul style="list-style-type: none"> <li>Monthly policy bulletins are circulated to WMT and key officers by the Strategic Policy Manager</li> </ul>				
2.2 Working alongside other stakeholders and partner organisations to keep informed of developments such as:- <ul style="list-style-type: none"> <li>Local Government Association</li> <li>District Councils Network</li> <li>Kent Finance Officers Group</li> <li>Kent Resilience Forum</li> </ul>	<b>Wider Management Team</b>	<ul style="list-style-type: none"> <li>This is being done and aligns with 2.8 below</li> </ul>				
2.3 Information sharing and gathering across all Council services	<b>Wider Management Team</b>	<ul style="list-style-type: none"> <li>Wider management team meetings are held every 2 months where updates are given by various services.</li> <li>Corporate Improvement Team in place reviewing services and gathering intelligence in how they operate</li> </ul>				
2.4 Circulation of monthly briefings to key officers on proposed / new legislation	<b>Wider Management Team</b>	<ul style="list-style-type: none"> <li>As in 2.4 above</li> </ul>				
2.5 Effective business continuity planning	<b>Wider Management Team</b>	<ul style="list-style-type: none"> <li>Internal Audit recently carried out in this area</li> <li>Business continuity framework recently reviewed by Management Team. Updated Business Continuity Plans / Templates and action cards to be circulated to directorates.</li> </ul>				
2.6 Regular updates to members on development and potential changes in legislation	<b>Committee Services/ Wider Management Team</b>	<ul style="list-style-type: none"> <li>This can happen via all member emails, member bulletins, member briefings with senior officers or through presentations at the relevant committees</li> </ul>				
2.7 Co-ordination and sharing of information with other local authorities through various networks and forums	<b>Wider Management</b>	<ul style="list-style-type: none"> <li>See section 2.2 above</li> <li>Senior officers involvement in officer groups within Kent such as the Chief Accountants Group, Kent Finance Officers Group, Risk Management Group</li> </ul>				

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<b>The Risk</b>		<b>Organisational capacity/resilience</b>										<b>Risk No.</b>	<b>3</b>				
<b>Link to Corporate Objective</b>		#People: a proud community; where residents can call a safe, clean and attractive borough their home.															
<b>Review Date</b>		October 2022															
<b>Cabinet Portfolio</b>		Deputy Leader (but affects all portfolios)															
<b>Risk Owner(s)</b>		Chief Executive and Management Team															
<b>INHERENT RISK SCORE</b>					<b>RESIDUAL RISK SCORE</b>					<b>TARGET RISK SCORE</b>							
<b>Likelihood</b>	5	<b>Impact</b>	4	<b>Score</b>	20	<b>Likelihood</b>	4	<b>Impact</b>	3	<b>Score</b>	12	<b>Likelihood</b>	3	<b>Impact</b>	3	<b>Score</b>	9

Trigger	Consequences
External opportunities of agile and home working in light of the COVID pandemic is making it difficult to recruit staff, especially those in specialist roles.	Increase in turnover resulting with a reduction in staff, Specialist roles remain vacant for prolonged periods of time, placing additional pressures on staff in service areas which may already have stretched resources. Increased agency costs Services areas with reduced staff will suffer a greater impact
Overstretched resources resulting with reduced staff motivation, low morale and increased sickness and stress levels.	Council will be required to provide additional help and support to overcome problems.
Staff (especially office based) experiencing difficulties in adapting to remote working	Increase in organisational stress negatively impacting productivity and mental health and wellbeing.

Controls to eliminate, reduce or transfer risk	Lead Officer	Management Action Update as at Mid-Year Review	Quarterly Risk Assessment			
			Q1	Q2	Q3	Q4
3.1 A Hybrid Working Policy was introduced from 1 November 2021 giving office-based staff the opportunity to work from home, depending on the needs of the service. Initiatives that have been introduced to ensure the Council remains competitive in order to retain existing staff and attract potential employees include: <ul style="list-style-type: none"> <li>• Increased availability of training for (including qualification training).</li> <li>• Revisiting and improving advert templates and reviewing where vacancies are advertised.</li> <li>• HR and Managers working closely to ensure career progression is available within services.</li> <li>• The introduction of a Management Development Programme</li> </ul>	HR Business Partner	<p>The Hybrid Working Policy and arrangements became permanent on 1 April 2022 following a successful trial period.</p> <p>There has been an increase in demand and take up for qualification training but due to this it has put a strain of the current qualification budget which is being addressed with Finance. The apprenticeship levy is being explored further and we currently have nine permanent employees undertaking qualification training via this route (including two Planning Degrees).</p> <p>The advert templates are in the process of being amended and personalised to attract more candidates. Alternative methods of advertising have also been used including Indeed and direct campaigns via Linked In, which have proved successful in some roles. The Council's social media channels are also being explored further to promote all vacancies moving forwards.</p> <p>A number of new career progression roles have been introduced within the Council (Committee Services, Planning, Surveyors) and this is also factored into any restructures as and when the need arises.</p>				



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Controls to eliminate, reduce or transfer risk	Lead Officer	Management Action Update as at Mid-Year Review	Quarterly Risk Assessment			
			Q1	Q2	Q3	Q4
		<p>We are currently in the process of sourcing external training providers in order to offer a formal management development programme in house.</p> <p>Following the cost-of-living crisis and competitive employment market the Council is having to explore further ways to attract and retain staff and we are currently looking at reviewing the benefits package within the Council.</p>				
<p>3.2 HR continue to monitor the levels of stress and sickness absence within the Council and support line managers. When appropriate staff will be referred to Occupational Health and the Employee Assistance Programme. Other initiatives in order to support staff wellbeing that have been introduced and will continue, include:</p> <ul style="list-style-type: none"> <li>• Undertaking periodic Wellbeing surveys amongst the workforce.</li> <li>• Reviewing the format of the joint staff forum to ensure the whole workforce is represented at the meetings and includes a wellbeing item on the agenda.</li> <li>• Undertaking weekly Webinars that are run by the Council's Employee Assistance Programme.</li> <li>• Reviewing and promoting the role of the Councils Mental Health Champions.</li> </ul> <p>Continuing Investors in People reviews next one due in April 2022.</p>	HR Business Partner	<p>Stress and sickness is monitored monthly within the Council with head of service receiving monthly reports for their teams to filter down. In those areas with high levels of sickness monthly face to face meetings are being held with HR to tackle this.</p> <p>A wellbeing survey is due to be circulated in Q3.</p> <p>The joint staff forum has been reviewed despite an initial lack of interest which has resulted in the last few forums being cancelled a number of employees have now expressed an interest in becoming representatives. The new format will be in place for the next meeting.</p> <p>Weekly webinars still continue to be provided to all employees.</p> <p>HR are working with Health &amp; Safety with a view to retraining a number of Mental Health first aiders in the workplace. Once this is undertaken, they will meet on a regular basis and promote this additional support to employees and what the Council can do to further promote positive mental health and wellbeing in the workplace.</p> <p>The Council achieved gold standard when reviewed by Investors in People in April 2022, previous award was silver, so this was a fantastic achievement.</p>				
<p>3.3 All line managers undertook training in November 2021 on Leadership Behaviours for Managing and Motivating Hybrid Teams.</p> <p>The Hybrid Working Policy provides office-based staff the opportunity to adopt a better work life balance.</p>	HR Business Partner	<p>HR continue to support Managers and employees with any issues as a result of the new Hybrid working arrangements as and when they arise.</p> <p>The management development programme will also reinforce this aspect once implemented.</p>				

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<b>The Risk</b>	<b>Cyberattack resulting in data breach or corruption of data</b>											<b>Risk No.</b>	<b>4</b>				
<b>Link to Corporate Objective</b>	#3 Progress: an entrepreneurial authority; commercial in outlook and committed to continuous service improvement, underpinned by a skilled workforce and strong governance environment Deliver a more resilient, creative, cost effective Council Digital innovation Successfully manage key business risks																
<b>Review Date</b>	October 2022																
<b>Cabinet Portfolio</b>	Leader																
<b>Risk Owner(s)</b>	Director (Corporate Services)																
<b>INHERENT RISK SCORE</b>					<b>RESIDUAL RISK SCORE</b>					<b>TARGET RISK SCORE</b>							
<b>Likelihood</b>	4	<b>Impact</b>	4	<b>Score</b>	16	<b>Likelihood</b>	3	<b>Impact</b>	4	<b>Score</b>	12	<b>Likelihood</b>	2	<b>Impact</b>	4	<b>Score</b>	8

Trigger	Consequences
Member of staff falls victim to phishing attack	The login credentials used by a member of staff is stolen enabling an unauthorised user to access and modify data and systems used by that person. In the case of a user with access to privileged systems this may also enable administrative access and the ability to move laterally between systems. The ultimate consequence could be a cyber-attack resulting in a loss of access to Council systems and data.
Member of staff falls victim to "drive by download"	A member of staff visits a website which has been poisoned with malware which automatically runs when the web page is viewed. The malware is able to access resources on the computer with the same level of access as the logged in user, or with elevated privileges if combined with additional vulnerabilities (such as unpatched software), The ultimate consequence could be a cyber-attack resulting in a loss of access to Council systems and data.
Misconfiguration of IT Infrastructure results in a breach	An item of IT infrastructure is accidentally configured in such a way that it allows exploitation by an external actor to carry out a cyber-attack resulting in a loss of access to Council systems and data
Brute force attack against IT infrastructure results in breach	An attacker constantly attempts to gain access to Council systems via external infrastructure (web sites, email systems, VPN) in a systematic way with the hope of finding a vulnerability which will provide access to Council systems and data. Once access has been gained, the ultimate consequence could be a cyberattack resulting in a loss of access to Council systems and data.
Unpatched software vulnerability results in breach	All software has the potential to have bugs and programming errors. Unpatched software means there are vulnerabilities in a program or code that the Council is aware of and will not or cannot fix. Bugs in software can be exploited to carry out tasks for which the software was not originally designed to perform, such as carrying out a cyber-attack.
Denial of service attack prevents IT systems from being used	The Council's internet connections is flooded with a high volume of meaningless data which prevent legitimate data from getting through. Access to Council services for staff and members of the public is prevented and the systems appear to be down.
Ransomware attack steals and then deletes Council data	A malicious actor who has gained a foothold within the Council IT infrastructure is able steal large volumes of data before destroying access to that data for the Council. Staff are not able to access their systems or data and provide their services.

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			Q1	Q2	Q3	Q4
4.1 Cyber awareness training for staff	<b>Assistant Director (Transformation and IT)</b>	An exercise has been undertaken with all staff, with refresher training provided to those who failed the test.				
4.2 <ul style="list-style-type: none"> <li>• Use of strong passwords</li> <li>• Use of multifactor authentication</li> <li>• Separation of administrative accounts from general user accounts</li> </ul>	<b>Assistant Director (Transformation and IT)</b>	These controls continue to be in place.				
4.3 <ul style="list-style-type: none"> <li>• Use of web filtering software to control access to known high risk websites</li> <li>• Use of antivirus software</li> <li>• Use of non-administrative accounts when browsing the web</li> <li>• Timely patching of software vulnerabilities</li> <li>• In 2022 a dedicated IT Security Officer post will be established which will coordinate all IT security activity across the Council and improve our security posture</li> </ul>	<b>Assistant Director (Transformation and IT)</b>	These controls continue to be in place. Web filtering will soon be undertaken by a new firewall.				
4.4 <ul style="list-style-type: none"> <li>• Policies, processes, and procedures for configuration of IT infrastructure</li> <li>• Staff training</li> <li>• In 2022 a dedicated IT Security Officer post will be established which will coordinate all IT security activity across the Council and improve our security posture</li> </ul>	<b>Assistant Director (Transformation and IT)</b>	These controls continue to be in place. The dedicated IT Security Officer post is part of the Corporate Improvement Team work in IT which incorporates the wider team roles and structure. Once funding has been identified a report on the new structure will be presented to Management Team.				
4.5 <ul style="list-style-type: none"> <li>• Regular review of IT defences (such as firewall rules and network configurations) to ensure they are operating effectively</li> <li>• Regular scanning of IT infrastructure to identify what an attacker is able to see</li> <li>• Central recording of security incident logs which can identify when attacks happen</li> <li>• In 2022 a Security Operations Centre managed service will be explored in order to provide 24/7 proactive monitoring of our IT environment and highlighting any risks for further action on immediate identification</li> <li>• In 2022 a dedicated IT Security Officer post will be established which will coordinate all IT security activity across the Council and improve our security posture</li> </ul>	<b>Assistant Director (Transformation and IT)</b>	These controls continue to be in place. The managed Security Operations Service is part of the Corporate Improvement Team work in IT which incorporates the wider team roles and structure. Once funding has been identified a report on the new structure will be presented to Management Team.				

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			Q1	Q2	Q3	Q4
4.6 <ul style="list-style-type: none"> <li>• Only use software which is supported by the supplier</li> <li>• Apply patches to software in a timely manner when notified by the supplier of a vulnerability</li> <li>• In 2022 further systems and procedures will be explored for the automation of loading software patches to speed up the process and reduce the amount of time software is vulnerable</li> <li>• In 2022 a dedicated IT Security Officer post will be established which will coordinate all IT security activity across the Council and improve our security posture</li> </ul>	<b>Assistant Director (Transformation and IT)</b>	These controls continue to be in place. Please see above regarding Security Officer role and managed Security Operations Centre.				
4.7 <ul style="list-style-type: none"> <li>• The Councils internet connection provided by KPSN features a high level of Distributed Denial of Service protection from JISC (the internet service provider)</li> <li>• In 2022 a Security Operations Centre managed service will be explored in order to provide 24/7 proactive monitoring of our IT environment and highlighting any risks for further action on immediate identification</li> <li>• In 2022 a dedicated IT Security Officer post will be established which will coordinate all IT security activity across the Council and improve our security posture</li> </ul>	<b>Assistant Director (Transformation and IT)</b>	These controls continue to be in place. Please see above regarding Security Officer role and managed Security Operations Centre.				
4.8 <ul style="list-style-type: none"> <li>• Regular backup of data to systems that have ransomware protection and immutable storage</li> <li>• In 2022 a Security Operations Centre managed service will be explored in order to provide 24/7 proactive monitoring of our IT environment and highlighting any risks for further action on immediate identification</li> <li>• In 2022 a dedicated IT Security Officer post will be established which will coordinate all IT security activity across the Council and improve our security posture</li> </ul>	<b>Assistant Director (Transformation and IT)</b>	These controls continue to be in place. Please see above regarding Security Officer role and managed Security Operations Centre.				

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<b>The Risk</b>					<b>Investment Risk</b>					<b>Risk No.</b>	<b>5</b>						
<b>Link to Corporate Objective</b>					#3 Progress: an entrepreneurial authority; commercial in outlook and committed to continuous service improvement, underpinned by a skilled workforce and strong governance environment												
<b>Review Date</b>					October 2022												
<b>Cabinet Portfolio</b>					Leader												
<b>Risk Owner(s)</b>					Director (Corporate Services)												
<b>INHERENT RISK SCORE</b>					<b>RESIDUAL RISK SCORE</b>					<b>TARGET RISK SCORE</b>							
<b>Likelihood</b>	5	<b>Impact</b>	3	<b>Score</b>	15	<b>Likelihood</b>	5	<b>Impact</b>	2	<b>Score</b>	10	<b>Likelihood</b>	3	<b>Impact</b>	3	<b>Score</b>	9

Trigger	Consequences
Investments do not perform as expected	Investment income is reduced, negatively impacting on budget and the reputation of the Council which could impact on the delivery of services due to the loss of income.
Commercial property does not maintain the expected rental yield	Reduction in income for the Council which could adversely affect the delivery of services due to lack of financial resources.
Government intervention on investment activity for example potential changes to the Prudential Code and access to Public Works Loan Board (PWLB)	Council could be limited in its investment options going forward Requirement to disinvest in some areas that are performing well to ensure compliance with the relevant codes and legislation.

Controls to eliminate, reduce or transfer risk	Lead Officer	Management Action Update as at Mid-Year Review	Quarterly Risk Assessment			
			Q1	Q2	Q3	Q4
5.1 External professional advice is sought on new investment activity such as from the Council's treasury management advisors and subjected to due diligence checks Regular meetings with fund managers to ascertain how investments are performing. Maintaining and reporting on the Council's Treasury Management Strategy and Capital Strategy, which set out the criteria for investments Regular updates to members and management team on investment performance. Monitoring and review of treasury activity	Assistant Director (Corporate Services)	<ul style="list-style-type: none"> <li>Regular meetings have been held throughout the year with LINK the council's treasury management advisors.</li> <li>Internal treasury meetings are held quarterly within the finance team.</li> <li>A weekly newsletter is produced by LINK detailing the state of the money markets and the economy in general</li> <li>Regular meetings with our fund managers have taken place throughout the year so that the finance team are aware of any potential financial implications.</li> <li>Twice a year the TMSS is reviewed and presented at the Finance and Audit Committee for review and comment</li> <li>Investment performance is reported quarterly alongside the budget monitoring reporting</li> </ul>				

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5.2 Close working between finance and property services to enable early identification of risks or opportunities to the Council's investment portfolio. Maintaining the commercial income protection reserve. Currently this reserve is set at 15% of annual commercial income. Maintaining and reviewing the Property Acquisition Strategy and ensuring all commercial investments align with this strategy. Development of a Commercial Income Dashboard.	Assistant Director (Corporate Services)	<ul style="list-style-type: none"> <li>Property dashboard which includes investment yield is presented 5 times a year at the commercial services cabinet committee together with updates on the property investment portfolio.</li> </ul>				
5.3 Review of commercial property portfolio to ensure it is compliant with the Prudential Code and PWLB criteria. Research other investment opportunities / income streams.	Assistant Director (Corporate Services)	<ul style="list-style-type: none"> <li>This is completed at the time of investment and during the annual and in year reviews of the TMSS</li> </ul>				



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<b>The Risk</b>					<b>Adoption and delivery of a sound Local Plan</b>										<b>Risk No.</b>		<b>6</b>
<b>Link to Corporate Objective</b>					#3 Place												
<b>Review Date</b>					October 2020												
<b>Cabinet Portfolio</b>					Strategic Environment												
<b>Risk Owner(s)</b>					Director of Environment, Assistant Director (Planning)												
<b>INHERENT RISK SCORE</b>					<b>RESIDUAL RISK SCORE</b>					<b>TARGET RISK SCORE</b>							
<b>Likelihood</b>	4	<b>Impact</b>	4	<b>Score</b>	16	<b>Likelihood</b>	4	<b>Impact</b>	3	<b>Score</b>	12	<b>Likelihood</b>	3	<b>Impact</b>	3	<b>Score</b>	9

Trigger	Consequences
Local Plan is not up-to-date and not underpinned by a robust evidence base	<ul style="list-style-type: none"> <li>Local Planning Authorities (LPAs) are required to have an up to date local plan in place by the end of 2023 or face government sanction / intervention</li> <li>If Government intervention:               <ul style="list-style-type: none"> <li>o Reputational damage to the Council</li> <li>o The potential imposition of unwanted planning policies, causing an inability to deliver upon the Council's that are dependent on the Local Plan</li> </ul> </li> <li>Council less able to protect the Borough from inappropriate or poor quality development</li> <li></li> </ul>
Council is unable to identify a five-year land supply and fails the Government's Housing Delivery Test	<ul style="list-style-type: none"> <li>Where councils' cannot demonstrate a five year supply, national planning policy, rather than policies in a Local Plan have greater influence in decision making</li> <li>National policy states there should be a "presumption in favour of sustainable development" for housing. This means that if a site can be considered to deliver 'sustainable development' then planning permission could be granted, even if there is no support from the council for housing in that location or the site sits outside the Local Plan.</li> <li>Councils have less 'control' over where new homes are built:               <ul style="list-style-type: none"> <li>➤ May have to recommend approval of applications for sites they have not allocated</li> <li>➤ Increase in rejected proposals approved at appeal.</li> </ul> </li> </ul>

Controls to eliminate, reduce or transfer risk	Lead Officer	Management Action Update as at Mid-Year Review	Quarterly Risk Assessment			
			Q1	Q2	Q3	Q4
6.1 <ul style="list-style-type: none"> <li>Service has taken up the offer of a PAS Local Plan Gateway Review which is an independent assessment of the risks and opportunities faced.</li> <li>The Local Plan is supported by a detailed project timetable / project plan that is used to control and manage the process, so far as that is possible and that this is periodically presented to Management Team for management update/monitoring purposes.</li> </ul>	Assistant Director (Planning)	The management of this risk is considered adequate rather than good as Management Team have not been provided with an up to date detailed project timetable/project plan.				

**Gravesham Borough Council**  
**Mid-Year Review of Corporate Risks**  
 (Review of ALL risks detailed in the 2021-2022 Corporate Risk Register)

Controls to eliminate, reduce or transfer risk	Lead Officer	Management Action Update as at Mid-Year Review	Quarterly Risk Assessment			
			Q1	Q2	Q3	Q4
<ul style="list-style-type: none"> <li>There are risks which cannot be adequately mitigated because they are under the control of external organisations and the Council is reliant on those external parties for elements of the Local Plan. For example, updated transport modelling is required from Kent County Council in agreement with National Highways. This is outside of our direct control but essential for the plan.</li> </ul>						
6.2 Production of Housing Delivery Action Plan and implementation of the interventions identified within it	Assistant Director (Planning)	The management of this risk is considered inadequate because a revised Housing Delivery Action Plan has not been provided to Management Team.				