

# **GRAVESHAM BOROUGH COUNCIL**

## **CORPORATE RISK REGISTER**

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**2023-2024**

Gravesham Borough Council’s Corporate Risk Register is the result of a strategic risk management exercise conducted annually to identify, analyse and prioritise those risks that may affect the ability of the council to achieve its corporate objectives. Key risks facing the council are identified through discussion with Cabinet Members, Finance and Audit Committee Members, Members, Directors, Assistant Directors, Service Managers and other senior managers

The risk management exercise establishes the severity of risks through the utilisation of the risk matrix below. The risk matrix is used to establish the inherent risk score, the residual risk score and the target risk score.

**The Inherent Risk** – The severity of the risk is determined before any controls have been introduced to reduce or mitigate the risk.

**The Residual Risk** – The severity of the risk is determined after implementation of controls that reduce or mitigate the risk. The “residual” risk position is effectively the “tolerable” risk position which the Council is **willing** to operate given current constraints. It balances the funding position with objectives outlined in the councils Corporate Plan.

**The Target Risk** – This is the “Optimal” risk position which the Council **aims** to reach through a combination of both improvements in existing controls and the introduction of new ones. This is informed by the Councils objectives detailed in the Corporate Plan.

**The Risk Matrix**

<b>LIKELIHOOD</b>	Very High	5	5	10	15	20	
	High	4	4	8	12	16	
	Medium	3	3	6	9	12	
	Low	2	2	4	6	8	
	Very Low	1	1	2	3	4	
	<b>High Risk</b>		1	2	3	4	
	<b>Medium Risk</b>		Negligible	Significant	Serious	Critical	
	<b>Low Risk</b>						
	<b>IMPACT</b>						

## Guidance used for assessing Likelihood and Impact

### Likelihood:

Rating	Score	
Very High	5	On the evidence and knowledge of officers and members it is almost certain that this issue will occur sometime within the next year. The issue may have already occurred in previous years either at the council or elsewhere.
High	4	On the evidence and knowledge of officers and members it is very likely that this issue or event will occur in the coming year.
Medium	3	On the evidence and knowledge of officers and members the issue is more likely to occur than not in the coming year.
Low	2	On the evidence and knowledge of officers and members it is unlikely that this event will occur in the coming year. Occurrences of this risk have occurred in the past, but occurrences are very few and far between.
Very Low	1	On the evidence and knowledge that this event would occur in either the coming year or in future years.

### Impact:

Rating	Score	
Critical	4	The financial impact on the authority would threaten the council's financial stability. The delivery of service to the public could be affected either permanently or for a long duration and the council could not achieve its key objectives. There would be a seriously damaging impact on the council's reputation through poor media coverage.
Serious	3	The financial impact on the authority would be significant although would not threaten the stability of the council's financial position. Services would experience disruption with the delivery of services being affected for a number of days. Whilst the council's objectives would be met there would be significant delays in achieving them. The council would endure poor media coverage for a period of time affecting the council's reputation, which would take some time to recover from.
Significant	2	There may be financial impact on the authority and/or the cost of mitigating the risk could exceed the financial implications of the risk there may be disruption to services and possibly delays in achieving the council's objectives. There may be poor media coverage, which could affect the council in the long term.
Negligible	1	There is little or no financial impact of the risk to the authority. There would be no disruption to the delivery of the council's key objectives or frontline services. There is no risk of this risk impacting on the council's reputation

All risks identified for 2023-2024 and their assessments are summarised in the table below and plotted in the Heat Map:

Risk Ref	Risk Description	Inherent Risk	Residual Risk	Target Risk
1	On-going financial viability of the council	20	16	12
2	Changes in national priorities and legislation	20	15	12
3	Organisational capacity/resilience	20	12	9
4	Cyberattack resulting in data breach or corruption of data	16	12	8
5	Investment risk	15	10	9
6	Adoption and delivery of sound Local Plan	16	12	9
7	Implementation of the Elections Act 2022	15	10	5

The risks that have generated a “High Risk” score can be seen coloured in red and these have therefore been included in the 2023-2024 Corporate Risk Register.

**Risk Heat Map (Residual Risk)**

<b>LIKELIHOOD</b>	Very High	5		5.7	2	
	High	4			3,4,6	1
	Medium	3				
	Low	2				
	Very Low	1				
	High Risk		1	2	3	4
	Medium Risk		Negligible	Significant	Serious	Critical
Low Risk		<b>IMPACT</b>				

Given that the council works in an ever-changing environment it will be necessary to conduct similar risk management exercises on a periodic basis. Progress against management actions recorded in the register will be reviewed on a six-monthly basis by the Finance and Audit Committee.

As a contribution to good corporate governance, risk management also forms a part of the annual business planning process – each departmental business plan has a specific service risk register to identify the key risks facing that service. This reinforces the corporate risk management approach through each Service Manager giving proper formal consideration to both, corporate and operational risks.

<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>Assessment Date</b>					January 2023												
<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>	4	<b>Impact</b>	3	<b>Score</b>	12

<b>Lead Officer (s)</b>										<b>Target Date</b>							
Director (Corporate Services); Assistant Director (Corporate Services)										March 2024							

<b>Trigger</b>	<b>Consequences</b>	<b>Mitigation / Control</b>
<p>Financial Challenges due to significant increases in costs and inflation and reduced income leading to intensified financial pressure on the budget.</p> <p>Increase in costs of Temporary Accommodations and Homelessness.</p> <p>Uncertainty as to how local government will be funded in future years.</p> <p>Central Government Finance reforms have been put on hold (fair funding review, business rates retention and future of new homes bonus).</p> <p>Delays in court / legal proceedings leading to delays in recovery of owed amounts.</p>	<p>Difficult decisions around funding of services and quality of services compromised.</p> <p>Inability to plan effectively for future years.</p> <p>Traditional income generating activity has reduced (such as car parking income and investment income).</p> <p>Council not being able to meet its statutory obligations due to lack of funding.</p> <p>Uncertainty of funding for the authority and for future projects.</p> <p>Changes in legislation have a negative financial impact on the Council.</p> <p>Impact on minimum reserve limits.</p>	<ul style="list-style-type: none"> <li>• Effective Budget Monitoring.</li> <li>• Medium Term Financial Plan in place (MTFP).</li> <li>• Ongoing monitoring of the MTFP.</li> <li>• Monitoring of changes in legislation.</li> <li>• Monitoring of changes in legislation by officers.</li> <li>• Model effects of any changes in legislation and application of these to the MTFP.</li> <li>• Responding to Government Consultations.</li> <li>• MTFS in place which includes 'Balancing the Budget' activity</li> <li>• 'Balancing the Budget' initiatives monitored on a monthly basis by Management Team</li> </ul>
<b>Key corporate documents and processes in place</b>	<ul style="list-style-type: none"> <li>• Effective Budget Monitoring</li> <li>• Medium Term Financial Plan (MTFP)</li> <li>• Monitoring of the MTFP</li> <li>• Monitoring of changes in legislation.</li> <li>• Applying model effects of any changes in legislation to the MTFP</li> <li>• Responding to Government Consultations</li> </ul>	

<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>#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>#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>Assessment Date</b>	January 2023																
<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>Lead Officer (s)</b>	<b>Target Date</b>
Chief Executive/ Management Team/Wider Management Team	March 2024

<b>Trigger</b>	<b>Consequences</b>	<b>Mitigation / Control</b>
<p>Changes in national priorities including National Significant Infrastructure Projects (NSIP).</p> <p>Current proposals that affect the Borough are: -</p> <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>	<p>Council may not have the necessary resources to deliver on key projects.</p> <p>Projects may adversely affect local residents.</p>	<p>Monthly policy bulletins are circulated to Wider Management Team (WMT) and key officers</p> <p>Working alongside other stakeholders and partner organisations to keep informed of developments such as: -</p> <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> <p>Information sharing and gathering across all Council services</p>
<p>Change (s) in legislation / statutory duties imposed by Central Government such as: -</p> <ul style="list-style-type: none"> <li>• Local Government Reform</li> <li>• Levelling Up Agenda</li> <li>• The Environment Bill</li> </ul>	<p>Introduction of new statutory duties could: -</p> <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>	<ul style="list-style-type: none"> <li>• Circulation of monthly briefings to key officers on proposed / new legislation</li> <li>• Effective business continuity planning</li> <li>• Regular updates to members on developments and potential changes in legislation</li> <li>• Preparation of workforce strategy</li> <li>• Co-ordination and sharing of information with other local authorities through various networks and forums</li> </ul>
<b>Key corporate documents and processes in place</b>	<ul style="list-style-type: none"> <li>• Corporate Plan 2019-2023</li> <li>• Medium Term Financial Strategy &amp; MTFP</li> <li>• Circulation of monthly policy bulletins and briefings to WMT and key officers</li> <li>• Partnership Working &amp; Information Sharing through relevant networks and forums</li> <li>• Business Continuity Planning</li> <li>• Workforce Strategy</li> </ul>	

<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>Assessment Date</b>					January 2023												
<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

<b>Lead Officer (s)</b>					<b>Target Date</b>				
Laura Lowrey					June/July 2023				

<b>Trigger</b>	<b>Consequences</b>	<b>Mitigation / Control</b>
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.	<ul style="list-style-type: none"> <li>• Introduction of a Hybrid Working Policy giving office-based staff the opportunity to work from home, depending on the needs of the service</li> <li>• Introduction of initiatives to ensure the Council remains competitive in order to retain existing staff and attract potential employees e.g.: -</li> <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>
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.	<ul style="list-style-type: none"> <li>• Monitoring levels of stress and sickness absence within the Council HR support for line managers.</li> <li>• Staff referred to Occupational Health and the Employee Assistance Programme whenever appropriate.</li> <li>• Introduction of initiatives to support staff wellbeing, including: -</li> <li>• Undertaking of 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> <li>• Continuing Investors in People reviews</li> </ul>

Trigger	Consequences	Mitigation / Control
Recruitment and Retention.	The inability to recruit and retain staff in the current employment market, resulting in officers having to take on additional responsibilities resulting in additional pressure and stress negatively impacting productivity and mental health and wellbeing.	<ul style="list-style-type: none"> <li>• Review of the benefits package</li> <li>• Introduction of more career graded posts</li> <li>• Further exploration of training opportunities to 'grow our own' via the apprenticeship levy</li> <li>• Reintroduction of mental health first aiders and wellbeing initiatives</li> <li>• More frequent staff surveys with a focus on workloads and mental health and wellbeing</li> </ul>
<b>Key corporate documents and processes in place</b>	<ul style="list-style-type: none"> <li>• Corporate Business Plan 2019-2023</li> <li>• Workforce Development Plan</li> <li>• Hybrid Working Policy</li> <li>• Initiatives to retain existing staff and attract new talent</li> <li>• Stress and Sickness absence monitoring</li> <li>• Referrals to Occupational Health and Employee Assistance Programme when necessary</li> <li>• Introduction of Management Development Programme</li> <li>• Maintaining Investors in People (IIP) reviews</li> <li>• Training for Managers</li> </ul>	



<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>	#Progress: an entrepreneurial authority; commercial in outlook and committed to continuous service improvement, underpinned by a skilled workforce and strong governance environment																
<b>Assessment Date</b>	January 2023																
<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

<b>Lead Officer (s)</b>	<b>Target Date</b>
Assistant Director (Transformation & IT)	November 2023

<b>Trigger</b>	<b>Consequences</b>	<b>Mitigation / Control</b>
Officer or Member 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.	<ul style="list-style-type: none"> <li>• Cyber awareness training for staff</li> <li>• Use of strong passwords</li> <li>• Use of multifactor authentication</li> <li>• Separation of administrative accounts from general user accounts</li> <li>• A member of the IT team has passed the Certified Information Systems Security Professional (CISSP) qualification and will be applying their knowledge to the continuous improvement of the council's security posture</li> </ul>
Officer of Member 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.	<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>• A member of the IT team has passed the Certified Information Systems Security Professional (CISSP) qualification and will be applying their knowledge to the continuous improvement of the council's security posture</li> </ul>
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.	<ul style="list-style-type: none"> <li>• Policies, processes, and procedures for configuration of IT infrastructure</li> <li>• Staff training</li> <li>• A member of the IT team has passed the Certified Information Systems Security Professional (CISSP) qualification and will be applying their knowledge to the continuous improvement of the council's security posture</li> </ul>

Trigger	Consequences	Mitigation / Control
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.	<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 2023 a Security Operations Centre managed service will be explored in order to provide 24/7 proactive monitoring of our IT environment and highlight any risks for further action on immediate identification</li> <li>• A member of the IT team has passed the Certified Information Systems Security Professional (CISSP) qualification and will be applying their knowledge to the continuous improvement of the council's security posture</li> </ul>
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.	<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 2023 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>• A member of the IT team has passed the Certified Information Systems Security Professional (CISSP) qualification and will be applying their knowledge to the continuous improvement of the council's security posture</li> </ul>
Denial of service attack prevents IT systems from being used	The Council's internet connections are 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.	<ul style="list-style-type: none"> <li>• The Council's internet connection provided by KPSN features a high level of Distributed Denial of Service protection from JISC (the internet service provider)</li> <li>• In 2023 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>• A member of the IT team has passed the Certified Information Systems Security Professional (CISSP) qualification and will be applying their knowledge to the continuous improvement of the council's security posture</li> </ul>
Ransomware attack steals and then deletes Council data	A malicious actor who has gained a foothold within the Council IT infrastructure is able to 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.	<ul style="list-style-type: none"> <li>• Regular backup of data to systems that have ransomware protection and immutable storage</li> <li>• In 2023 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>• A member of the IT team has passed the Certified Information Systems Security Professional (CISSP)</li> </ul>

Trigger	Consequences	Mitigation / Control
		<ul style="list-style-type: none"> <li>• qualification and will be applying their knowledge to the continuous improvement of the council's security posture</li> </ul>
<p><b>Key corporate documents and processes in place</b></p>	<ul style="list-style-type: none"> <li>• Business Continuity Plans</li> <li>• IT Security Policies</li> <li>• Cyber Awareness Training</li> <li>• Policies, processes, and procedures for configuration of IT infrastructure</li> <li>• Use of web filtering software and anti-virus software</li> <li>• Regular review of IT defences</li> <li>• Establishment of a dedicated IT Security Officer post</li> <li>• Regular backup of data to protected systems</li> <li>• Use of supplier supported software</li> <li>• Exploration of a Security Operations Centre Managed Service, to provide 24/7 proactive monitoring of the Council's IT environment</li> <li>• Timely application of patches to software following notification of vulnerability</li> </ul>	

<b>The Risk</b>					<b>Investment Risk</b>					<b>Risk No.</b>		<b>5</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>Assessment Date</b>					January 2023												
<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

<b>Lead Officer (s)</b>					<b>Target Date</b>				
Director (Corporate Services), Assistant Director (Corporate Services)					March 2024				

<b>Trigger</b>	<b>Consequences</b>	<b>Mitigation / Control</b>
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.	<ul style="list-style-type: none"> <li>External professional advice is sought on new investment activity such as from the Councils treasury management advisors and subjected to due diligence checks</li> <li>Regular meetings with fund managers to ascertain how investments are performing</li> <li>Maintaining and reporting on the Council's Treasury Management Strategy and Capital Strategy, which set out the criteria for investments</li> <li>Regular updates to members and management team on investment performance</li> <li>Monitoring and review of treasury activity</li> </ul>
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.	<ul style="list-style-type: none"> <li>Close working between finance and property services to enable early identification of risks or opportunities to the Council's investment portfolio.</li> <li>Maintaining the commercial income protection reserve. Currently this reserve is set at 15% of annual commercial income</li> <li>Maintaining and reviewing the Property Acquisition Strategy and ensuring all commercial investments align with this strategy</li> <li>Development of a Commercial Income Dashboard</li> </ul>
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.	<ul style="list-style-type: none"> <li>Review of commercial property portfolio to ensure it is compliant with the Prudential Code and PWLB criteria</li> <li>Research other investment opportunities / income streams</li> </ul>

**Key corporate documents and processes in place**

- Treasury Management Strategy (TMS)
- Capital Strategy
- Property Acquisition Strategy
- Receipt of professional advice from the Councils treasury management investors
- Regular meetings with fund managers
- Regular presentation of performance updates to Members and management team
- Regular review and monitoring of treasury activity
- Close working relationship between Finance and Property Services departments
- Maintenance of the commercial income protection reserve.
- Maintenance and review of the Property Acquisition Strategy
- Development of a Commercial Income Dashboard
- Regular review of commercial property portfolio
- Research opportunities for investment and income streams

<b>The Risk</b>					<b>Adoption and delivery of sound Local Plan</b>					<b>Risk No.</b>		<b>6</b>					
<b>Link to Corporate Objective</b>					#Place 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												
<b>Assessment Date</b>					January 2023												
<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

<b>Lead Officer (s)</b>					<b>Target Date</b>				
Service Manager (Planning) Assistant Director (Planning)					December 2023				

<b>Trigger</b>	<b>Consequences</b>	<b>Mitigation / Control</b>
Local Plan is not up-to-date and not underpinned by a robust evidence base.	<p>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</p> <p>If Government intervention: - Reputational damage to the Council The potential imposition of unwanted planning policies, causing an inability to deliver upon the Council's objectives that are dependent on the Local Plan</p> <p>Council less able to protect the Borough from inappropriate or poor-quality development.</p>	<ul style="list-style-type: none"> <li>Service took 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> <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. Delays in this work from 2020-2022 has significantly impacted on the work on the Local Plan and the update of the Local Development Scheme. National Highways are a statutory consultee for the Local Plan so non-compliance with their requirements would be very risky</li> </ul>
Council is unable to identify a five-year land supply and fails the Government's Housing Delivery Test.	<p>Where councils cannot demonstrate a five-year supply, national planning policy, rather than policies in a Local Plan have greater influence in decision making</p> <p>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.</p> <p>Councils have less 'control' over where new homes are built: -</p> <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 and volume of appeals</li> </ul>	<ul style="list-style-type: none"> <li>Production of Housing Delivery Action Plan and implementation of the interventions identified within it.</li> </ul>

**Key corporate documents and processes in place**

- Housing Delivery Action Plan
- Local Development Scheme
- Take up independent assessment through a PAS Local Plan Gateway Review
- Local Plan that is supported by a detailed project timetable and project plan
- Housing Delivery Action Plan

<b>The Risk</b>	<b>Implementation of the Elections Act 2022</b>										<b>Risk No.</b>	<b>7</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>#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>#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>Assessment Date</b>	January 2023																
<b>Cabinet Portfolio</b>	Full Council																
<b>Risk Owner(s)</b>	Chief Executive and Returning Officer																
<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>	5	<b>Impact</b>	1	<b>Score</b>	5

<b>Lead Officer (s)</b>										<b>Target Date</b>									
Simon Walsh Service Manager (Communities)										5 May 2023									
<b>Trigger</b>					<b>Consequences</b>					<b>Mitigation / Control</b>									
Secondary legislation not in place to inform planning for May 2023.					<p>Risk mitigations and choices being made uninformed (see also comms risk).</p> <p>The Returning Officer may struggle to deliver the elections they have personal responsibility for e.g., electors prevented from voting leading to a challenge to the way the poll was conducted. Potential errors leading to lack of confidence in the administration of the poll and the result.</p> <p>The risk of challenge by petition after the election will be higher.</p> <p>Election outcome is open to challenge e.g., electors not being issued with electoral identity documents and being unable to vote.</p> <p>The democratic legitimacy of the Council might be undermined hindering its ability to fulfil its role.</p> <p>Reputational damage for the local authority.</p> <p>If election results are challenged via electoral petition, council decision making maybe affected.</p>					<ul style="list-style-type: none"> <li>External dependency on Department for Levelling Up, Housing and Communities (DLUHC) delivery.</li> </ul>									
Electoral Commission Guidance not in place to inform planning for May 2023.					<p>Election outcome is open to challenge e.g., electors not being issued with electoral identity documents and being unable to vote.</p> <p>Failure to deliver polling e.g., electors prevented from voting leading to a challenge to the way the poll was conducted. Potential errors leading to lack of confidence in the administration of the poll and the result.</p> <p>Reputational damage for the local authority.</p>					<ul style="list-style-type: none"> <li>External dependency on DLUHC delivery.</li> </ul>									
Too much workload on Electoral Services Officers					<p>Stress/ sickness absence.</p> <p>Unable to process applications in a timely manner.</p> <p>Disenfranchised electors (with disproportionate impact on certain demographics and deprived areas).</p> <p>Reputational damage, increased costs, Impact on election capacity, Impact on other activities.</p>					<ul style="list-style-type: none"> <li>Additional officer support to be allocated to the elections team to increase capacity</li> <li>Inbuilt resilience in sharing workload across the electoral service.</li> </ul>									



Trigger	Consequences	Mitigation / Control
ICT System failure (Government Portal for Voter ID).	<p>Unable to process applications and/or authorised IDs incorrectly.            Centralised printing of Voter ID document is disrupted and therefore not despatched in timely fashion to electors.            Disenfranchised electors (with disproportionate impact on certain demographics and deprived areas).            Reputational damage.            Increased workloads and costs.            Impact on election capacity.            Electoral Fraud.</p>	<ul style="list-style-type: none"> <li>External dependency on DLUHC delivery</li> <li>Training of staff will be conducted once the system information is available</li> <li>Additional officer support to be allocated to the elections team to increase capacity</li> <li>Ability to issue temporary electoral identity documents in contingency situations where the usual determination, printing and distribution process is disrupted</li> </ul>
Quality of product (Voter ID document) is not fit for purpose.	<p>Voter ID document becomes damaged or unusable prior to election            Voter ID document is forgeable for use in a polling station            Increased workload/failure demand            Disenfranchised electors            Impact on Local Election results and election integrity</p>	<ul style="list-style-type: none"> <li>Extensive training package to be put in place (reliant on secondary legislation, guidance and training packages being available)</li> <li>The ERO will have the ability to allow the appointment of an emergency proxy for that polling day</li> <li>Electoral identity document expected to be an A4 paper-based document with inherent security features</li> <li>Ability to issue temporary electoral identity documents in contingency situations where the usual determination, printing and distribution process is disrupted.</li> <li>Increased polling staffing levels for May 2023 elections</li> </ul>
Communications are not effective (Comms Risk).	<p>Increase in voter ID requests leading to being unable to process applications in a timely manner (see above).            Electors do not need to apply for Voter ID (as they already have suitable photographic ID).            Elector assumes Poll Card Letter is ID.            Electors do not realise they need ID and do not like being challenged in the station.            Electors being potentially disenfranchised.</p>	<ul style="list-style-type: none"> <li>External dependency on Electoral Commission on delivery of comms (who are in turn dependent on DLUHC delivering)</li> <li>Utilise internal comms team as far as able to - but reliant on secondary legislation and guidance being in place</li> <li>Ahead of the introduction of the voter identification requirement, the Electoral Commission will carry out a wide-reaching public awareness campaign (from early 2023) to ensure voters understand the change and to support continued participation in the electoral process</li> <li>The EC's advertising campaign will be designed to reach the public and, as the majority already have an eligible form of photographic identification, it will focus on raising awareness of the change and serve as a reminder to those in election areas</li> </ul>
Additional Responsibilities for polling staff	<p>Increased difficulty in recruiting (particularly presiding officers) and increased training requirements (including for experienced staff).            Risk to election deliver.            Increased issues in polling stations etc.            Unable to deliver polls.</p>	<ul style="list-style-type: none"> <li>Increase polling staffing levels for May 2023 elections</li> <li>DLUHC funding provision</li> <li>Extensive training package to be put in place (reliant on secondary legislation, guidance and training packages being available)</li> <li>Contact staff early for May 2023 (underway), to inform planning</li> <li>Put all council teams and staffing on standby to assist if required</li> </ul>

Trigger	Consequences	Mitigation / Control
Increased serious polling station incidents due to additional 'challenge point' of ID.	Increased resourcing requirement on police. Police unable to respond to serious incidents as occupied elsewhere. Risks to staff safety - Difficulty recruiting new staff or retaining experienced staff. Staff are put in dangerous situations.	<ul style="list-style-type: none"> <li>• Increase polling staffing levels for May 2023 elections</li> <li>• DLUHC funding provision</li> <li>• Extensive training package to be put in place (reliant on secondary legislation, guidance and training packages being available)</li> <li>• Make early contact with police to discuss resourcing and cover</li> </ul>
Poll card changes (to an A4 letter) lead to increased costs and confusion.	Electors are confused, voter ID vs Poll 'card', do not recognise poll card as its changing form (so it is not opened or disposed of). Turnout is impacted, including postal votes. Costs of elections increase due to postage costs changing. Election integrity questioned and risks of challenge increase. Political fallout and reputational damage. Impact on council's finances if not covered by a DLUHC indemnity.	<ul style="list-style-type: none"> <li>• Communications required (see Comms Risk)</li> <li>• DLUHC dependency</li> <li>• Additional officer support to be allocated to the elections team to increase capacity</li> </ul>
<b>Key corporate documents and processes in place</b>	<ul style="list-style-type: none"> <li>• Corporate Business Plan 2019-2023</li> <li>• Elections Project Plan and Risk Register</li> <li>• Dependency on Department for Levelling Up, Housing &amp; Communities (DLUHC)</li> <li>• Allocation of additional officer support to increase capacity during elections</li> <li>• Staff training</li> <li>• Contingency plan during disruption</li> <li>• Appointment of an emergency Proxy</li> <li>• Utilisation of internal Comms team</li> </ul>	

