

South Oxfordshire District Council Corporate Risk Register

SODC Corporate	Sa All themes	Sb Protect and restore our natural world	Sc Openness and Accountability	Sd Action on Climate emergency	Se Improved economic and community well-being	Sf Homes and Infrastructure that meet local needs	Sg Investment that rebuilds our financial Viability	A	B	C	D	E	F	G	H	I	J	K	L
Risk No/Ref	Corporate Strategic Themes	Risk category	Risk description / consequences	Gross risk rating	Risk owner	Mitigation actions	Action owner	Net risk rating	Tolerable Y/N	Further mitigation actions if required	Review by when								
49	Sa	Operational	Third party contractors Business Continuity Plans (BCP) and file back ups are not fit for purpose and may result in poor customer service and loss of council reputation if there a) is failure of IT infrastructure. b) Disaster Recovery Incident	8	Mark Stone, Adrianna Partridge, Suzanne Malcolm	IT There is a review of the IT Business continuity Plan (BCP) across 5CP . Ongoing review council Business Resilience Plans (BRPs) IT arrangements Capita have 30 days of back up at any one time. Because there is no immutable backup of councils' data and application within Capita network, 5C partners are exploring implementation of offline backups for council data stored on Capita network via 3rd party supplier. External funding has been provided to assist in implementation and deployment. No dates have been provided at this time. CAPITA are now deliverig abrinuJa DR tests for 5CP, next schedule test is end of July/ 22 All other Third Party Contractors Review all Third Party BCPs to ensure that they are fit for purpose.	All Service Managers	8	Y	No remote back up from CAPITA currently. Discussions are ongoing fro the planned separation of Office 365 from 5CP and move IT services to Azure (cloud) delayed due to increased cost to undertake this work, hence this net risk rating has not been mitigated down. Currently ETA end of 2022 early 2023 , subject to further discussion. Review procurement procedures to include Third Party BCPs . Develop training on contract management and monitoring to ensure the council manage performance effectively. Maintain Spreadsheet of Third Party Market performance Share price to monitor potential issues with contractor viability/performance. Continue to monitor the situation. External 3rd party backups will still be needed. Due to constant delays the net risk has increased to 8 CAPITA are proposing to move all of the 5CP servers to their MS Azure environment, this will remove council reliance on CAPITA servers resulting in improved resilience and availability.	Jul-22								
65	Sa	Technology security	IT Cybersecurity breach due to inadequate security protection of the councils external website may lead to the council systems and data being compromised and result in council financial and reputation loss.	8	Adrianna Partridge	The council has an experienced information governance officer and data protection officer in post. A senior IT manager has been trained and now holds a certificate in Cyber security (CISM) Cyber and data security working group which includes members from IT, Risk and Insurance, Business continuity and the Data protection Officer are working through the data security Internal Audit recommendations have instigated Cyber and Data Security awareness campaigns to improve user awareness whilst working from home. The councils Emergency Planning/Business Continuity officer currently chairs the TVLRF Cyber Resilience Working Group which meets quarterly to share learning and discuss cyber risks. Partner agencies share learning and warn and inform on any breaches to LRF partners. The councils were chosen by the LGA to undergo an external LGA cyber audit. The councils websites are now hosted on a Government approved hosting platform external to CAPITA. It is now monitored and managed , the updates to Wordpress software are also updated regularly. What is excluded is updates as result of vulnerabilities to SAV specific modules requires monitoring.	Simon Turner	6	Y	New applications being deployed directly as Software as a Service (SaaS) will have Single-Sign On (SSO) protocols enabled. SSO delivers login to the SaaS application directly to an end-user by automating the login via their Microsoft 365 credentials , website admin.This makes it harder for cyber-criminals to access these applications without a legitimate M365 login. It also improves leaver access to applications as accounts are automatically disabled across all SSO systems when the Capita login account is closed.Cyber incident plan for SAV drafted for review.	Jul-22								
2	Sa	Technology security	IT Cybersecurity breach due to inadequate security protection of the Software as Service Non cloud applications (Zellis/Unit 4 etc) may lead to the council systems and data being compromised and result in council financial and reputation loss.	8	Adrianna Partridge	CAPITA information security infrastructure provides continuous updates of security software, firewalls and patches. The 5CP Information security group regularly meets to discuss issues and mitigation actions. The council has an experienced information governance officer and data protection officer in post. A senior IT manager has been trained and now holds a certificate in Cyber security (CISM) Cyber and data security working group which includes members from IT, Risk and Insurance, Business continuity and the Data protection Officer are working through the data security Internal Audit recommendations have instigated Cyber and Data Security awareness campaigns to improve user awareness whilst working from home. The councils Emergency Planning/Business Continuity officer currently chairs the TVLRF Cyber Resilience Working Group which meets quarterly to share learning and discuss cyber risks. Partner agencies share learning and warn and inform on any breaches to LRF partners. Multifactor authentication (MFA) has been deployed to all staff and councillors. Capita VPN already has MFA. By adding additional layer of authentication it makes it difficult for login account to be compromised as an additional item of security is needed to using a password. Account passwords lengths increased across all accounts. Capita are doing annual penetration tests as a result of that a revised action plan of vulnerabilities is produced and worked through with each of the 5CP. Monthly updates are held with Capita security team on progress. This is a continuous programme as there are new vulnerabilities appearing all the time. We are now members of SEGWARP a local government security forum in the SE.	Simon Turner	6	Y	Metacompliance Training Modules have been purchased and will be rolled out to all staff and councillors on LEAH.Awaiting configuration of LEAH to design the training modules for staff. Review of Cllr awareness underway with 30 min briefings and regular In Focus updates to be agreed . Looking to implement single sign in of council networks using S/V credentials which will provide an extra level of complexity. This is dependent upon the 5CP tenancy split in 2022. New applications being deployed directly as Software as a Service will have Single-Sign On (SSO) protocols enabled. SSO delivers login to the SaaS application directly to an end-user by automating the login via their Microsoft 365 credentials. This makes it harder for cyber-criminals to access these applications without a legitimate M365 login. It also improves leaver access to applications as accounts are automatically disabled across all SSO systems when the Capita login account is closed.	Jul-22								
11	Sb	Procedural/regulatory	Failure to fulfil the Data Protection legislative requirements may result in fines, insurance claims and reputational damage if data is breached or a challenge is made	8	Patrick Arran (DPO)	Information Governance and Data Protection role provides dedicated support to all teams as well as work to develop/review the corporate framework and all relevant policies. Close liaison with Legal on data sharing agreements and review of contract clauses. Additional Information Governance Officer is a permanent post . Updates to Record of Processing Activities (ROPA) during 20/21 to be embedded as a regular review process. Data Protection Impact Assessments (DPIAs) considered for all new processes and Data Protection Team/Officer advice sought on all new projects. Data protection training for all staff on LEAH. Internal Audit of Data Protection satisfactory assurance. Keep up to date with guidance from the Information Commissioner and other bodies in relation to data protection and information rights. We are undertaking assurance work and completing the ICO assurance framework. Working from abroad Policy in place to ensure staff are aware of requirements	Sandy Bayley	6	Y	Constant monitoring of legislative tests. Work to ensure that all Data Protection policies are in place and up to date, including ongoing review of the ROPA. Developing a bespoke data breach procedure for all staff. Ensure FOI/EIR requests are correctly managed to ensure compliance with DPA and minimise data breaches arising from incorrect handling. Write a new retention policy and records management policies, including retention and redacting, across the councils, review third party contractors and contracts to ensure requirements for processing personal data processing policies are accurately recorded. Community hub developing procedures to manage GDPR.	Jul-22								

9	Sc	Procedural - Health and safety	Falling to have an effective health and safety management system in place and lack of resource to support, may result in a fatality, illness or injury to staff or anyone else affected by our business; damage to property; legal action by HSE; civil claims and increased costs.	8	Mark Stone, Adrianna Partridge, Suzanne Malcolm	Health & Safety advisor in place however the Senior Health and Safety Advisor post is vacant (since June 2021). After the fundamental review of Health & Safety management system was undertaken and SMT and JAGC approved, the subsequent action plan is being progressed. Items covered are: the principle of a Corporate Landlord Model for properties, re-established monthly reporting to SMT which includes agreed KPI's, regular joint reporting between Health & Safety, Risk & Insurance to enable risks to be proactively managed. Write policies aligning to this to follow, including first aid, DSE, lone working, hybrid working etc. Home DSE checks have been undertaken and are reviewed. A number of H&S training including Lone Workers courses are now on LEAH for all staff to access. New H&S Policy published in January 2022. Incidents continue to be reported and investigated. Number of reportable incidents low. Training organised by H&S, including fire warden, first aid, ladder inspection etc, plus LEAH modules in development to mitigate risks.	Mark Minior/David Fairall	6	Y	Recruit to CIPFA Stage 2 findings for Property Asset management and Senior Health and Safety Advisor (vacant post since June 2021). Continue to develop all Health & Safety policies: hybrid working, DSE, Lone worker etc. Continue to encourage and support reporting of incidents. Corporate Landlord should confirm where roles and responsibilities sit i.e. duty manager. Training matrix to be developed to ensure everyone has required training for their role from a H&S perspective	Jul-22
58	Sa	IT Security	IT and data security compromised due to remote working and naive user behaviour, which may result in data breach and fines/loss of reputation	8	Adrianna Partridge	Regular monitoring and review at triage and SMT. Capita monitoring network for unusual activity and reporting to councils. Action recommendations from security audit regard staff behaviours and awareness particularly during remote working. Update Jarvis pages etc. Cyber and data security awareness campaign 22/23 launched to raise awareness to all staff working remotely first key message Phishing with posters and Jarvis popup. Regular monthly Cyber Group Meetings. Metacompliance Training Modules are being uploaded on Leah for all staff and councillors. Multifactor authentication deployed to all councillors and officers to add an additional layer of security when logging into Office365 (already used for VPN). Regular comms updates to councillors and staff on cyber-security themes highlighting key messages on tips and information to avoid falling prey to cyber-scams and phishing attacks.	All Service Managers	6	Y	Continue to monitor and increase awareness throughout the year through Metacompliance and comms. Continued comms messages to staff and councillors on current threats, and known vulnerabilities being exploited, highlighting awareness and personal responsibility on being 'secure'	Jul-22
23	Sf	Planning	Lack of informed and consistent decision making across the councils due to some members wishing to follow their democratic right to 'call in' planning decisions and go against the planning officer advice results in increase in no's of appeals and JRT's, increased costs, loss of infrastructure funding and loss of council reputation.	7	Adrian Duffield	The Heads of Service, section 151 and monitoring officers inform and advise relevant councillors on consequences and impact of planning decisions and legal, financial and policy implications of decisions. We have a scheduled programme of training for 2022 for Committee members and cabinet members on the planning process, material planning considerations and implications and consequences of planning decisions in the local and national context. We have held recent sessions on: -the emerging changes with the Building Control Regulations -Planning Advisory Service provided material planning consideration training for Committee Members (2 x events for each Council) We have a session in the Corporate calendar for a combined ecology, trees and conservation training event in June We will also be looking to programme sessions on planning appeals, 5 yr housing land supply and the Joint Design Guide later in the year. We are also working with the Consultation and customer engagement team to improve communication with local residents and parishes	Adrian Duffield	2/3	Y	Maintain a consistent approach to briefing councillors on legal, financial and policy implications of making planning application decisions. Provide support to parishes with regular updates and communications on reasons for planning decisions in the local and national context.	Jul-22
66	Se	Finance	Failure to consider the impact of war in Ukraine on Council finances whereby expenditure may increase faster than income due to inability to increase council tax at the same rate and may impact the economic viability of specific services within the districts in the short to medium term.	7	Mark Stone	Monitor impact of war in Ukraine and assess income and expenditure through budget monitoring throughout 2022/23 to determine if in-year contingency is sufficient. Budget setting for future years will need to reflect impact of the war on the council's finances.	Simon Hewings	2/3	Y	Work with other councils and national bodies to demonstrate impact of war on council finances and lobby for further funding	Jul-22
4	Sa	Security - resources	Failure to manage the security of all council owned assets including council offices may result in an incident or intruder entering the building putting our staff and visitors at risk or potential injury claims.	6	Adrianna Partridge/Suzanne Malcolm/James Carpenter	135 Reopened to staff as per the stage 2 of roadmap to recovery following protocols of booking and recording entry via secure pass doors. Didcot Gateway Security: Outside consultants advising on security for new premises. Cornerstone and community centres have designated key holders and security checks as part daily operations. Corporate Landlord Model: Provides clarity on roles and responsibilities. Terror threat level decreased to Substantial in Feb 22, gross risk reduced to 6 Amber. Remain alert to PROTECT draft Legislation and guidance.	Heads of Service	2/3	Y	Monitor security plans across all council owned assets.	Jul-22
41	Sa	Security - resources	Major incident in the district - failure to adequately respond to a major incident affecting our residents may result in legal action (corporate manslaughter/environmental pollution) and loss of reputation.	5	Adrianna Partridge	The council has an Emergency Planning Officer (EPO) within the Programmes and Assurance team. The team have up to date Emergency Plans which include establishing a Crisis Response Team and cover appropriate escalations to deal with Major Incidents. The EPO attends TVLRF and Oxfordshire County Council meetings on a regular basis to ensure joint working and understanding of roles and responsibilities in the event of an emergency incident. The team receives and reviews regular updates from the Local Resilience Forum (LRF) partners and Resilience Direct. To respond to an incident the LRF would 'stand up' an SCG or TCG as appropriate and would call upon partners to allocate resources as indicated in agreed plans. This could include a scientific technical advisory cell (STAC) in the event of environmental issues. A major incident would be responded to by the relevant partner agencies, utilising Joint Emergency Services Interoperability Programme (JESIP) principles. The team keep up to date with the latest developments, regularly review internal plans and arrangements, undertake training and participate in emergency planning incident exercises. Successfully undertook Golden Chariot Exercise with OCC, updated plans accordingly.	Ben Coleman/Harry Barrington-Mountford	2/3	Y	Plan to carry out test of our own cascade call system following Golden Chariot de brief. Look into feasibility of running a cyber exercise.	Jul-22

21	Sa	Procedural/regulatory	Changes in legislation and government policy, may impact the operational delivery of the councils' corporate objectives.	6	Adrianna Partridge/ Harry Barrington-Mountford	Environment Bill enshrined in law with effect from 10 Nov 2021. Insight and Policy Team researching implications. A number of DEFRA consultations on the new Environment Act have been responded to. Most recently a collaborative response across, Biodiversity, Climate, Waste and Air Quality teams for input into the consultation environmental targets. We continue to use the responses to these as a powerful lobbying and feedback tool. Climate & Biodiversity Team Leader in post who will review the specific requirements for both Councils to ensure compliance to new Environment Act obligations. A waste procurement expert is employed to support the waste contract procurement, planned interim contract with BIFFA at present until all implications are known. Building Safely Bill emerging with implications for building control relating to fire safety. Levelling up and regeneration bill monitoring potential implications for the councils.	Michelle Wells	2/3	Y	Review options to extend existing Biffa contract for Waste in light of potential changes in the Environment Bill until changes are understood. Planning: Senior officer training for building safely bill planned for Jan 2022 - both South and Vale Continuation of surveillance of further DEFRA announcements on the Environment Act and input into consultations held. Monitor impact on Affordable housing,infrastructure on planning as a result of the Levelling up and regeneration Bill. Govt will consult on refugees dispersal schemes monitor impact on councils.	Jul-22
15	Sc	Contract/Procedural	Failure of third party contracts to deliver acceptable levels of statutory service, resulting in non compliance of councils statutory obligations, reduction of service provision, inefficient operations, financial penalties and increased costs.	5	Simon Hewings	Methodology to report service breaches are in place, this provides evidence to use in contract re-negotiation. Contracts continue to be under review with focus on lessons learned. Governance structure in place and regular monitoring meetings held. Annual Performance Reports Scrutiny reviews projects as part of Corporate Delivery Framework. Performance reporting process has been embedded to ensure openness and transparency. Provision of effective contract monitoring training for staff. Consider succession planning for hand over of contracts to ensure consistency and that focus is maintained. Council waste contract procurement to incorporate contract monitoring requirements.	All Heads of Service	2/3	Y	Possible central contract monitoring group linked to SMT to review and report on contractual obligations and revisit contracts. Management structure includes Head of Service and service management reporting on contract KPI's quarterly.	Jul-22
27	Se	Safeguarding	Failure to deliver council safeguarding responsibilities may result in loss of reputation and civil claims if a safeguarding incident occurs in our districts and we have not followed the stipulated procedures and protocols of reporting.	5	Adrianna Partridge Suzanne Malcolm Patrick Arran	Designated safeguarding officer (DSO) Adrianna Partridge and deputies, Suzanne Malcolm and Patrick Arran, in place. Cases referred to DSO which do not meet the threshold can be referred to monthly Joint Tasking Meeting for multi-agency review. Training ongoing Oxfordshire County Council conducts a joint annual audit incorporating the standards from the safeguarding self-assessment against the Children Act 2004 (s11 audit) as well as the standards developed for Adult Services. As part of this audit we submit an annual return which is subject to peer review.	Diane Foster	2/3	Y	New Leads to complete safeguarding training. Patrick Arran to commence training.	Jul-22
NEW 67	Sa	Resources personal security	Failure to support and equip staff for hybrid working may result in poor morale and wellbeing.	5	Adrianna Partridge/Mark Minion	Decision confirmed to move to Abbey House as business continuity measure, meaning limited space to work in one office space. However, comms sent to remind people that there is other bookable office / meeting room space, such as Cornerstone, Beacon, GWP, so no mandate to work from home specifically. People can also work from other suitable external locations and/or other people's houses or shared spaces to mitigate potential loneliness. Wellbeing team reorganised to promote more community / interactive events.Launched CEO Q&A session with teams.Regular staff comms.	Mark Minion/ David Fairall	2/3	Y	Continue to promote wellbeing initiatives Publish hybrid working policy. Continue to remind people of options other than working from home	Jul-22
14	Se Sg	Finance	Failure to maximise opportunities to realise areas of revenue growth may impact overall future council finances.	4	Mark Stone, Adrianna Partridge, Suzanne Malcolm	All Heads of Service to be vigilant in terms of new funding streams and opportunities and ensure that fees and charges relate to the budgeted cost of operating the service/scheme, are reasonably set and reviewed regularly as highlighted in the recent budget challenge process. Suzanne Malcolm to look for future revenue growth opportunities.	Simon Hewings	2/3	Y		Jul-22