

Corporate Risk Register - Vale of White Horse District Council

VWHDC Corporate Strategic Themes												
All Councils												
Providing the homes people need												
Tackling Climate Emergency												
Building Healthy Communities												
Building Stable Finances												
Working in Partnership												
Working in an open and inclusive way												
A	B	C	D	E	F	G	H	I	J	K	L	M
Risk Number	Corporate Strategic Theme	Risk category	Risk description / consequences	Onset risk rating	Risk owner	Mitigation actions	Action owner	Net risk rating	Tolerable Y/N	Further mitigation actions if required	Review by when	
50	Va	Operational	Third party contractors Business Continuity Plan (BCP) and file back up are not fit for purpose and may result in poor customer service and loss of council reputation if there is a failure of IT infrastructure. 3) Disaster Recovery Incident	6	Mark Stone, Adriana Partridge, Suzanne Matcok	IT There is a review of the IT Business continuity Plan (BCP) across SCP. Ongoing review council Business Resilience Plans (BRPs). IT engagements. Capita have 30 days of back up at any one time. Rescue plans in place for irremovable backup of council data and application with Capita network. SCP partners are exploring implementation of office backups for council data stored on Capita network. External funding has been provided to assist in implementation and deployment. No dates have been provided at this time. CAPTA are now delivering annual DR tests for SCP, next schedule test is end of July 22 All other Third Party Contractors Review all Third Party BCP's to ensure that they are fit for purpose.	All Service Managers	6	Y	To review back up from CAPTA currently. Discussions are ongoing for the planned separation of Office 365 from SCP and move IT services to Azure (costly) however due to increased cost to operationalise 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 BCP's. Develop training on contract management and monitoring to ensure the council manage performance effectively. Monitor satisfaction of Third Party partners performance. Share plans to monitor potential issues with contractor stability/performance. Continue to review the situation. External 3rd party backups will still be needed. Due to constant delays the net risk has increased to 6 CAPTA are preparing to move all of the SCP services to their AWS Azure environment, this will remove council reliance on CAPTA servers resulting in improved resilience and availability.	Jul-22	
67	Va	Technology security	If Cybersecurity breach that 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.	6	Adriana 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 campaign to improve user awareness whilst working from home. The councils Emergency Planning/Business Continuity officer currently chairs the TULSF Cyber Resilience Working Group which meet quarterly to share learning and discuss cyber risks. Partner agencies share learning and warn and inform on any breaches to LSF partners. The councils were chosen by the LGA to undergo an external LGA cyber audit. The councils website are now hosted on a Government approved hosting platform external to CAPTA. 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 SaaS 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 allows login to the SaaS application directly to an end user by authenticating 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 learner access to applications as accounts are automatically disabled across all SSO systems when the Capita login account is closed. Cyber incident plan for SaaS drafted for review.	Jul-22	
2	Va	Technology security	If Cybersecurity breach due to inadequate security protection of the Software as a Service non cloud applications (Citrix/Lync 4 etc) may lead to the council systems and data being compromised and result in council financial and reputation loss.	6	Adriana Partridge	CAPTA information security infrastructure provides continuous update of security software, firewalls and patches. The SCP information security group regularly meet to discuss issues and mitigate against them. 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 campaign to improve user awareness whilst working from home. The councils Emergency Planning/Business Continuity officer currently chairs the TULSF Cyber Resilience Working Group which meet quarterly to share learning and discuss cyber risks. Partner agencies share learning and warn and inform on any breaches to LSF partners. Multi-factor authentication (MFA) has been deployed for all staff and councilors. Capita VPN already has MFA. By adding additional layer of authentication makes it difficult for login access to be compromised as an additional layer 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 regular action plan of vulnerabilities is produced and worked through with staff of the SCP. 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 SECURAP a local government security forum in the SE.	Simon Turner	6	Y	Multi-compliance Training Modules have been purchased and will be rolled out to all staff and councilors on LGA training configuration of LGA to align the training modules for staff. Review of CR awareness underway with 30 day learning and usage of Focus guides to be agreed. Looking to implement single sign-in of council networks using SVA credentials which will provide an extra level of complexity. This is dependent upon the SCP licence split in 2022. New applications being deployed directly as Software as a Service will have Single-Sign On (SSO) protocols enabled. SSO allows login to the SaaS application directly to an end user by authenticating 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 learner access to applications as accounts are automatically disabled across all SSO systems when the Capita login account is closed.	Jul-22	
11	Va	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.	6	Patrick Anon (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. Update to Report of Processing Activities (ROPA) during 2021 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	Gandy Bayley	6	Y	Constant monitoring of legislative bills. 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 PDR/R requests are correctly managed to ensure compliance with DPA and review data breaches arising from internal handling. Write a retention policy and records management policies, including retention and handling, across the council, review third party contractors and contracts to ensure requirements for processing personal data processing policies are accurately recorded. Community Hub developing protocols manage GDPR.	Jul-22	
9	Va	Procedural-Health and safety	Failing to have an effective health and safety management system in place and lack of resources to support, may result in a safety breach or injury to staff or anyone else affected by our business, damage to property, legal action by HSE, cost claims and increased costs.	6	Mark Stone, Adriana Partridge, Suzanne Matcok	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 & JAGG approved, the subsequent action plan is being progressed. Items covered are: the principle of a Corporate Landed 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 relating 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 Minors/David Parat	6	Y	Review 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 their role and responsibilities (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	
62	Va	IT Security	If and data security compromised due to remote working and naive user behaviour, which may result in data breach and loss of reputation.	6	Adriana Partridge	Regular monitoring and review of usage and SMT. Capita monitoring network for unusual activity and reporting to councilors. Action recommendations from security audit regard staff behaviours and awareness particularly during remote working. Update device papers etc. Cyber and data security awareness campaign 2022 launched to raise awareness to all staff working remotely first key message Phishing with posters and Jarvis popup. Regular monthly Cyber Group Meetings. Multi-compliance Training Modules and being updated on LGA for all staff and councilors. Multi-factor authentication deployed to all councilors and officers to add an additional layer of security when logging into Office365 (already used for VPN). Regular courses update to councilors 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 Multi-compliance and comms. Continued comms messages to staff and councilors on current threats, and newer vulnerabilities being exploited, highlighting awareness and personal responsibility on being 'secure'	Jul-22	
68	Va	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 stability 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 year contingency is sufficient. Budget setting for future years will need to reflect impact of the war on the councils finances.	Simon Heavings	7	Y	Work with other councils and national bodies to demonstrate impact of war on council finances and lobby for further funding	Jul-22	

22	VI	Planning	Lack of informed and consistent decision making across the council 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 risk of appeals and JRTs, 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 consultation 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, 5yr 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	23	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
4	Va	Security - resources	Failure to manage the security of all council owned assets including council offices may result in an incident or incident entering the building putting our staff and visitors at risk or potential injury claims.	6	Adriana Partridge/Suzanna Malcom/James Carpenter	135 Responded to staff as per the stage 2 of roadmap to recovery following protocols of locking and recording entry via secure pass doors. District Calaveras Security Outside consultants asking on security for new premises. Comersone and community centres have designated key holders and security checks as part daily operators. Comersone Landlord Model Provides daily on risk and responsibilities. Terror threat level decreased to Substantial in Feb 22, gross risk reduced to 6 Amber. Remain alert to PROTECT staff Legislation and guidance.	Heads of Service	23	Y	Monitor security plans across all council owned assets.	Jul-22
41	Va	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	Adriana Partridge	The council has an Emergency Planning Officer (EPO) within the Programme and Assurance team. The team have led to site Emergency Plans which established a Crisis Response Team and cover appropriate locations to deal with Major Incidents. The EPO attends TYLRF and Odoobahia County Council meetings on a regular basis to ensure joint working and understanding of risks and responsibilities in the event of an emergency incident. The team reviews 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 SCS or TCG as appropriate and would call upon partners to allocate resources as indicated in agreed plans. The council would also activate a technical advisory cell (TEAC) 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 undertake Golden Charter Exercise with OCC, updated plans accordingly.	Ben Coleman/Harry Barrington-Mountford	23	Y	Plan to carry out test of our own cascade call system following Golden Charter exercise. Look into feasibility of running a cyber exercise.	Jul-22
20	Va	Procedural/regulatory	Changes in legislation and government policy, may impact the operational delivery of the councils corporate objectives.	5	Adriana Partridge/Hari Barrington-Mountford	Environment Bill introduced in law with effect from 10 Nov 2021. Insight and Policy Team reanalyzing implications. A number of DEFRA consultations on the new Environment Act have been responded to. Have 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 to 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 BPPFA is present until all implications are known. Building Grants are emerging with implications for building control relating to the safety. Leveling up and regeneration bill monitoring potential implications for the councils.	Michelle Wells	23	Y	Planning Senior officer training for building safety 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 Leveling up and regeneration bill. Core will consult on refugees dispersal schemes monitor impact on councils.	Jul-22
15	Va	Contracts	Failure of third party contracts to deliver acceptable levels of statutory services, resulting in non compliance of councils statutory obligations and reduction of service provision, inefficient operations, financial penalties and increased costs (Merge with risk 40)	5	Simon Hevings	Methodology to report service breaches are in place, the problem evidence is 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 Statutory reviews projects as part of Corporate Delivery Framework. Performance reporting process has been introduced to ensure openness and transparency. Provision of effective contract monitoring training for staff. Contract succession planning for hand over of contracts to ensure consistency and the focus is maintained. Council waste contract procurement to incorporate contract monitoring requirements.	All Heads of Service	23	Y	Planning Senior officer training for building safety bill planned for Jan 2022 - both South and Vale.	Jul-22
27	Va	Safeguarding	Failure to deliver council safeguarding responsibilities may result in loss of reputation if a safeguarding incident occurs in our districts and we have not followed the appropriate procedures and protocols of reporting.	5	Adriana Partridge/Suzanna Malcom/Patrick Armit	Designated safeguarding officer (DSO) Adriana Partridge and deputies, Suzanna Malcom and Patrick Armit, to 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. Process in place to protect potential victims of modern slavery (MS1). Mandatory training appropriate to the level of contact, as a District Council with no social services and education responsibilities is available on LEAH. All staff complete training every 3 years, and new starters complete this as part of their induction. Monthly reports are produced to inform what staff are due training and procedures in place to ensure training is completed as required. The safeguarding policy has been reviewed and is published on our safeguarding page on canvas along with guidance on how to report any safeguarding concerns.	Steve Foster	23	Y	New Leads to complete safeguarding training. Patrick Armit to commence training.	Jul-22
14	Va	Finance	Failure to maximise opportunities to realise areas of revenue growth may impact overall future council finances.	4	Mark Stone, Adriana Partridge, Suzanna Malcom	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/teams, are reasonably met and reviewed regularly as highlighted in the recent budget challenge process. Suzanna Malcom to look for future revenue growth opportunities.	Simon Hevings	23	Y		Jul-22
69	Va	Resources/personal security	Failure to support and equip staff for hybrid working may result in poor morale and wellbeing.	5	Adriana Partridge/Mark Milson	Decision confirmed to move to Abbey House as business continuity measure, meaning limited space to work in one office space. However, commits users to remote people that there is other bookable office / meeting room spaces, such as Comersone, Beacon, OWS, so no need 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 recognised to promote more community / interactive events Launched CEO Q&A session with teams Regular staff comms.	Mark Milson/David Farrell	23	Y	Continue to promote wellbeing initiatives Publish hybrid working policy. Continue to remind people of options other than working from home	Jul-22

Down from 6-5