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 3+3	Risk owner	Mitigation actions	Action owner	Net risk rating 3+3 matrix	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 c) Loss of corporate data data and possible data breach	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 (BRP's) 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 abnnual DR tests for 5CP, next schedule test mid 23 **All other Third Party Contractors** Review all Third Party BCP's to ensure that they are fit for purpose.	All Service Managers	8	Y	Review procurement procedures to include Third Party BCPs . Develop training on contract management and monitoring to ensure the council manage performance effectively. External 3rd party backups will still be needed. CAPITA's proposal to move all of the 5CP servers to their MS Azure environment, removing council reliance on CAPITA servers , improved resilence and availability is now not being actioned as costly. However, agreed with Capita that MS365 will move to offline backups once work has been concluded with Mendip post April. Until then this risk remains red 8.	Mar-23
73	Sc Sf	Statutory	**Failure to provide suitable temporary housing for the asylum refugees in our district** results in the council not fulfilling its statutory obligations as the levels of homelessness increase.	9	Mark Stone,Adrianna Partridge, Suzanne Malcolm	Housing delivery strategy agreed 2022. S/V have a dedicated team to host the Oxfordshire wide project to investigate accommodation options in the short term to enable refuges to 'move on' from hosted to independent accommodation, funded by central government. Capital funding from the council to purchase property DHLUC funding to deliver a number of homes through the (LA Housing Fund - LAHF) Collaborative working across property team and housing teams to deliver suitable housing within the tight time frame.	Adrianna Partridge/Ben Coleman	8	Y	Paper to cabinet on March 9 outlining approach.	Mar-23
70	Sa	Contractual	**Failure of waste service at end of current contract in June 2024** may result in poor service to residents and loss of reputation and potential fines.	8	Mark Stone/ Suzanne Malcolm	Proposed options outlined via Senior management review and Project Board with Legal and Financial support to ensure a waste service will be in place.	Paul Fielding	8	Y	Member approval of recommended option will be taken by Cabinet on March 23,with appropriate delegation to the Dep Ceo Place and HOF in consultation with relevant cabinet members to ensure a waste service will be in place across the district.	Mar-23
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 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. Deployed all Cyber training modules to staff on Leah. 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 is 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.	Simon Turner	2/3	Y	Cyber incident plan for SAV drafted for integration into the Emergency plan as a scenrio. 6 to 2/3 green nety risk score Sa	

2	Sa	Technology security	**IT Cybersecurity breach due to inadequate security protection of the Software as Service 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. Cloud based application will be configured ssith single sign on using MS 365 accounts ensuring only valid users can log in to cloud based systems. Meta compliance training models have been rolled out on Leah anmd form part of corporate induction training. Cllr cyber briefings are now part of the Cllr induction programme via L&D. 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.	Simon Turner	2/3	Y	Continue to complete migration of all council apps to the SAAS cloud. GREEN NET	Mar-23
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 team now has a settled establishment of permanent staff and provides dedicated support to all teams as well as developing a hub and spoke network of Information Governance Champions. There has been extensive work to establish assurance in line with the ICO toolkit with significant progress made and raising awareness at SMT level with a regular update dashboard. Work has been underway to further work to develop/review the corporate framework and all relevant policies. There is close liaison with Legal on data sharing agreements and review of contract clauses. Updates to Record of Processing Activities (ROPA) to be further 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 is closely monitored to ensure compliance. Keep up to date with guidance from the information Commissioner and other bodies in relation to data protection and information rights. Working from abroad policy now in place to ensure all staff are aware of the requirements.	Sandy Bayley	6	Y	Constant monitoring of legislative tests. Continue work to ensure that all Data Protection policies are in place and up to date, including ongoing review of the ROPA. Ensure FOI/EIR requests are correctly managed to ensure compliance with DPA and minimise data breaches arising from incorrect handling.	Mar-23
9	Sc	Procedural - Health and safety	**Failing 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	A fundamental review of the Health & Safety management system was undertaken in 2019. Findings and progress of this review are considered by JAG and SMT on a regular basis. Health & Safety is a standing item on SMT agendas including quarterly reporting of reported incidents, key metrics and KPIs. The Last report showed an increase in reporting near miss incidents across the council whch is a measure of increased awareness amongst staff. Development of key health & safety policies: Lone Working,: DSE: Hybrid Working and First Aid . Training modules to be are available via LEAH for staff and councillors to access; reporting of completion rates for services areas will be reported to SMT.	Mark Minion/David Fairall	6	Y	Review of resourcing has been completed and active recruitment for an additional H&S business partner is ongoing . Cabinet approval has been given to set up Health and Safety champions and forum. Health and Safety policies under development include: Equipment Management;Management and Control of Contractors;Water Hygiene.	Mar-23
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 campaign22/23 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 added 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'. Councillor Cyber Security briefings have been devised via the Cyber and Data Security working group and will form part of the Cllr induction after the elections in May.	Mar-23

			Risk	Score	Owners	Controls	Lead	Score		Actions	Date
69	Sa	Statutory	**Failure to respond to change in waste legislation (Environment Act 2021)** may result in loss of council reputation and fines.	8	Mark Stone Suzanne Malcolm	Waste collection arrangements post June 2024 offers opportunity to be flexible to legislative changes. We await Government clarity as to the impact the Act may have on our services. Environment team working group which includes the Waste Programme Manager, William Maxwell to keep a watching brief to ensure the legislation is monitored and changes are captured at the earliest opportunity, ready to be developed into future service provision	Paul Fielding	6	Y	Once the impact of legislation is understood, review options for future service provison.	Mar-23
38	Sa	Statutory	**Failure to deliver a major election in accordance with our statutory requirements including the Elections Act** results in reputational damage and costs to re - run an election	8	Patrick Arran	Deliver the local elections 2023 following the Election Act 2022 and Voter ID requirements by: detailed project planning and risk registers which are regularly reviewed and updated as part of project governance. Delivery is monitored on a regular basis as and when appropriate. New returning officer and electoral registration officer, together with Deputy Returning Officers are in place.	Steven Corrigan	5	Y	Refer to Project risk register and dashboard	Mar-23
75	Sa	Openness and Accountability	**Failure to understand the effects of the programme to house refugees has on council residents who are waiting to be housed** may impact community wellbeing and cohesion across the districts leading to dissatisfied residents and loss of council reputation.	8	Mark Stone,Adrianna Partridge, Suzanne Malcolm	Housing delivery strategy agreed 2022. Collaborative working across property team and housing teams to deliver suitable housing within the tight time frame. Comms plan to all residents to manage expectations. community hub team in place which supports all residents. Gold and Silver Oxfordshire systems still in place to manage community wellbeing and community tensions.	HOS	6	Y	Paper to cabinet on March 9 outlining approach	Mar-23
71	Se	Active communities	**Failure to provide a full menu of leisure centre activities and reduced opening hours** due to the economic crises and pressures on fuel costs to enable a leisure centre with pool to operate results in loss of reputation at a time when wellbeing is key corporate objective and poor customer service.	7	Suzanne Malcolm/James Carpentar	3 million KW/Hrs saved due to Decarbonisation and other energy saving measure such as pool covers/LED lighting/reduced pool temperatures/reduction of circulation turnover of pools . Continue to work with our operator GLL who, post Covid have more discretion as to controls over opening hours to come to the best options to ensure good service provision for our residents.	Mark Foster/Ben Whaymand	5	Y	Ongoing effective management controls with GLL through regular Scrutiny and Cabinet reviews.	Mar-23
72	Sc Sg	Operational	**The transformation programme aim whereby staff will be enabled by systems and processes to deliver four key outcomes: 1. Customers (services accessible to all) 2.digital data and technology (user centred, secure and trusted) 3.people (supported, skilled and resilient) 4. future proofing the council (continually improving; efficient and adaptable)** are not realised over the timeframe resulting in outdated processes delivering a poor standard of customer service, lower efficiencies and loss of reputation.	8	Adrianna Partridge	Transformation team fully resourced. Cabinet paper approved approach Sept 2022. Governance structure in place. Plan to review all the council service areas by an agreed staged process outlined in the approved Cabinet paper. Service teams under review are part of the process and attend regular transformation meetings. Intranet transformation page on Jarvis. Staff briefings. Members reporting. Comms plan in place . Transformation operational group (TOK) also meets fortnightly to review the programme and manage escalations	Tim Oruye	6	Y	Develop regular reporting cycle and budgetary review.	Mar-23

			Risk	Score		Owner	Controls		Status			Actions	Date
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 2023 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 quarterly training sessions scheduled in the Corporate calendar for 2023 to provide Members with planning and building control updates, changes in policy and key themes/ trends.

We have a session scheduled in February on solar park proposals and considerations, along with a further session being scheduled for late February/early March on drainage matters.

We are also working with the community engagement team to improve communication with our residents and local 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. Following the PAS and PAS Peer Review we have pulled together an action plan of service delivery improvements and are working through these changes.

We are regularly reviewing our service delivery in line with the PAS recommendations. | Mar-23 |
| 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 | Mar-23 |
| 74 | Sc Sg | Finance | **Failure to plan for the potential long term impact high inflation has on council finances** linked to future Government funding limits results in poor service. | 6 | | SMT Budget Grp | Finance working group set up with key members from SMT(PA/SH/AP/SM) to review and monior the long term impacts on the councils and services and to regularly lobby the Government for future funding. | SMT Group | 6 | Y | Omg meeting in April SH to presnet medium term finanacila p[lan for OMG. To understand current po | Mar-23 |
| 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 | 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 remains substantial ..
Remain alert to PROTECT draft Legislation and guidance. Security audit has been undertaken at new Office premises at Abbey House, recommendations have been endorsed by our insurers ZM . A review is underway to help support staff against abusive customers .WIP.Didcot Gateway Security: Outside consultants advising on security for new premises , recommendations have been incorporated into the design. | Heads of Service | 2/3 | Y | Monitor security plans across all council owned assets. | Mar-23 |
| 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 | Ben Coleman/Tim Oruye | 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. | Mar-23 |
| 21 | Sa | Procedural/ regulatory | **Changes in legislation and government policy**, may impact the operational delivery of the councils' corporate objectives. | 6 | | Adrianna Partridge/ Tim Oruye/ Patrick Arran | 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. | Tim Oruye | 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,infrastruture on planning as a result of the Levelling up and regeneration Bill. Govt will consult on refugees dispersal schemes monitor impact on councils. | Mar-23 |

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. Regular report on KPI monitoring to Scrutiny (GLL/BIFFA/Capita)	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.	Mar-23
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.	Mar-23
67	Sa	Resources personal security	**Failure to estimate the impact of hybrid working and changes in ways of working through transformation as well as external economic factors on the staff morale** result in increased absence and stress cultural disconnect with the council and staff working in isolation poor customer service and loss of reputation**.**	5	Adrianna Partridge/Mark Minion	Staff briefings. Staff wellbeing group activities. Staff survey Abbey house nice office space fit for purpose. Drop-in sessions for staff Able to meet for lunch as part of wellbeing.	Mark Minion/ David Fairall	2/3	Y	Continue to promote wellbeing initiatives Continue to remind people of options other than working from home. A council-wide survey has been undertaken about staff perceptions of hybrid working this will be followed up with focus groups and training for managers on supporting staff in a hybrid working environment Action planning to commence.	Mar-23