

## APPENDIX 1: KCC Corporate Risk Register

### Risk Register - Corporate Risk Register

Current Risk Level Summary

Current Risk Level Changes

|       |   |       |   |     |    |       |    |
|-------|---|-------|---|-----|----|-------|----|
| Green | 0 | Amber | 5 | Red | 13 | Total | 18 |
|       |   |       |   | 1   | -9 | 1     | -9 |

|   |   |   |   |   |
|---|---|---|---|---|
| 0 | 1 | 1 | 0 | 3 |
| 0 | 0 | 0 | 5 | 5 |
| 0 | 0 | 0 | 2 | 0 |
| 0 | 0 | 0 | 0 | 1 |
| 0 | 0 | 0 | 0 | 0 |

| Risk Ref   | CRR0009   | Risk Title and Event   |                       |   | Assigned To  | Last Review da   | Next Review |             |            |
|--|---|--|-----------------------|---|--|------------------|-------------|-------------|------------|
| Future financial and operating environment for Local Government  |   |  |                       |   | John Betts   | 09/04/2025       | 30/09/2025  |             |            |
| Levels of spending and growth pressures across services outstrip the Council’s core spending power, threatening the financial sustainability of KCC, its partners and service providers.   |   |  |                       |   |  |                  |             |             |            |
| In order to set a balanced budget, the council is likely to have to continue to make significant year on year savings.   |   |  |                       |   |  |                  |             |             |            |
| Quality of KCC commissioned / delivered services suffers as financial situation continues to worsen.   |   |  |                       |   |  |                  |             |             |            |
| Continued delays and uncertainty surrounding review of local government funding impacts on KCC’s medium term financial planning.   |   |  |                       |   |  |                  |             |             |            |
| Cause  | Consequence   | Current Risk   | Previous Current Risk | Control / Action  |  | Control / Action | Target Date | Target Risk |            |
| The Government’s Autumn Budget 2024 statement and subsequent Local Government Finance Settlement covered 2025-26, with no indicative allocations for subsequent years, although there was a promise of multi-year settlements from 2026-27 onwards. This means that the forecasts for later years are speculative, consequently planning has to be sufficiently flexible to respond accordingly. | Unsustainable financial situation and potential drawdown from reserves, ultimately resulting in need to request Exceptional Financial Support from Government, or issue a section 114 notice. | High   |                       | • Developing better scrutiny of spending bids and more detailed savings plans, to improve the overall robustness of the budget setting process, thereby improving financial resilience. | John Betts A   | -Accepted        | 30/09/2025  | High        |            |
|  |   | 25   |                       |   |  |                  |             | 16          |            |
|  |   | Major (5)  |                       |   |  |                  |             | Serious (4) |            |
|  |   |  | Very Likely (5)       |   | • Processes in place for monitoring delivery of John Betts savings and challenging targets to bear down on future cost growth, as well as the budget as a whole. |                  | Control     |             | Likely (4) |
|  |   | Failure to deliver statutory obligations and duties or achieve social value. |                       |   | • Quarterly budget meetings between Chief Executive and Corporate Director for Finance with Corporate Directors as relevant.                                     | John Betts       | Control     |             |            |
| 2025-26 and the medium term to 2027-28 are likely to   | Potential for partner or provider failure – including sufficiency gaps in provision.  |  |                       | • Forecasts for future spending growth to be revised as necessary once estimates become more certain and only finalised in controllable budgets once uncertainties have been resolved.  | John Betts   | Control          |             |             |            |
|  | Reduction in resident satisfaction and reputational damage.   |  |                       |   |  |                  |             |             |            |

## Risk Register - Corporate Risk Register

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| <p>continue to be exceptionally challenging and will require significant spending reductions. Even though overall net cash is increasing, this is not sufficient to keep pace with forecast spending demands. There is also no certainty that additional central government funding to address spending pressures in social care will be baselined/continued for future years. The Government is also consulting on local government funding reform, which seeks views on the approach to local authority funding reform through the local government finance settlement that comes into effect from 2026-27.</p> <p>The level of savings required in 2025-26 and over the medium term continues to be higher than in recent years, driven largely by growth in spending rather than cuts in funding, representing a new challenge. A significant financial risk for the Council is the continuing and increasing underlying deficit and accumulated debt on the High Needs Block of Dedicated Schools Grant (DSG).</p> <p>An English Devolution White Paper was published at the end of 2024, which signals significant changes to the</p> | <p>Increased and unplanned pressure on resources.</p> <p>Decline in performance.</p> <p>Legal challenges resulting in reputational damage to the Council.</p> <p>Impact on Council Tax.</p> |  |  | <ul style="list-style-type: none"> <li>Regular "Star Chamber" budget reviews involving the Chief Executive Officer, section 151 Officer and Corporate Directors to scrutinise progress against agreed budget savings. John Betts</li> <li>Robust budgeting and financial planning in place via Medium Term Financial Planning (MTFP) process, including stakeholder consultation. John Betts</li> <li>Regular review of HM Treasury forecasts and Government planned spending levels for Local Government. John Betts</li> <li>Budget Recovery Strategy - Securing Kent's Future - set to address the in-year and future years' financial pressures the council is facing and the specific and broader action that can be taken to return the council to financial sustainability. Amanda Beer</li> <li>KCC Strategic Reset Programme established and reprioritised to focus on key budget delivery programmes. Amanda Beer</li> <li>Financial analysis conducted after each Chancellor of the Exchequer Budget Statement to review potential implications for future local government settlements. Dave Shipton</li> <li>Ensure evidence of any additional KCC spend required to cover impacts relating to new burdens imposed. Dave Shipton</li> <li>Ongoing policy analysis of the devolution agenda and devolution deals agreed by the government. David Whittle</li> <li>Engagement with CCN, Society of County Treasurers and other local authorities and Government of potential opportunities and issues around devolution, local government reorganisation and public service reform. David Whittle</li> <li>Regular monitoring and oversight of progress against KCC's 'Safety Valve' agreement with the Department for Education (DfE). Sarah Hammond</li> </ul> | <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> |  |  |
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## Risk Register - Corporate Risk Register

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| operating environment for the local government sector, including local government reorganisation. |  |  | <ul style="list-style-type: none"> <li>• KCC Quarterly Performance Report monitors key performance and activity information for KCC commissioned or delivered services. Regularly reported to Cabinet.</li> </ul>  | Matthew Wagner         | Control |  |  |
|   |  |  | <ul style="list-style-type: none"> <li>• Ongoing monitoring and modelling of changes in supply and demand in order to inform strategies and service planning going forward.</li> </ul>   | Matthew Wagner         | Control |  |  |
|   |  |  | <ul style="list-style-type: none"> <li>• Regular analysis and refreshing of forecasts to maintain a level of understanding of volatility of demand which feeds into the relevant areas of the MTFP and business planning process.</li> </ul>                                 | Corporate Directors CD | Control |  |  |
|   |  |  | <ul style="list-style-type: none"> <li>• Assessing impact and responding to Government plans with the potential for significant financial implications for the Council, including adult and children's social care, charges to waste collection arrangements etc.</li> </ul> | Corporate Directors CD | Control |  |  |

# Risk Register - Corporate Risk Register

| Risk Ref  | CRR0053  | Risk Title and Event         |                       |  | Assigned To   | Last Review da   | Next Review |                           |
|---|--|------------------------------|-----------------------|--|---------------|------------------|-------------|---------------------------|
| Asset Management and Degradation and associated impacts, linked to Capital Programme affordability  |  |                              |                       |  | John Betts    | 09/04/2025       | 30/09/2025  |                           |
| Impact on ability to meet operational requirements and/or statutory duties.   |  |                              |                       |  |               |                  |             |                           |
| Increase in maintenance backlogs.   |  |                              |                       |  |               |                  |             |                           |
| Emergency works on essential sites are prioritised to avoid serious health and safety incidents, with knock-on impacts for non-priority sites.  |  |                              |                       |  |               |                  |             |                           |
| Cause   | Consequence  | Current Risk                 | Previous Current Risk | Control / Action   |               | Control / Action | Target Date | Target Risk               |
| Assets not being invested in sufficiently or adequately maintained now will require future additional spend to maintain with the possibility of reactive costs which may create a revenue pressure. | Business interruption due to increasing level of reactive / emergency repairs, or parts of estate decommissioned (in whole or partially if deemed unsafe). | High                         |                       | Papers to Secretary of State seeking approval to increase school financial thresholds  | Joanne Taylor | A -Accepted      | 31/03/2026  | High                      |
| Ongoing investment to maintain and modernise our assets competes with the priority to protect frontline services from effects of public sector funding restraint.                                   | Health and safety incidents (potentially serious) associated with asset degradation.   | 25 Major (5) Very Likely (5) |                       | 10 year 24-34 capital programme published. Cath Head This identified projected costs for some of the rolling programmes and a separate section of potential stand-alone projects which are markers, and will need to have a full business case and identified funding planned, evaluated and agreed. |               | Control          |             | 16 Serious (4) Likely (4) |
| The level of borrowing to fund the capital programme and the impact on the revenue budget is significant.   | Inability to meet statutory duties e.g. lack of appropriate school place provision.  |                              |                       | Lobbying of Government in relation to capital funding.   | John Betts    | Control          |             |                           |
| The uncertainty includes capital expenditure funded by grants, many of which are crucial to delivery of statutory services.   | Non-priority sites may not be maintained to a sufficient standard and may not be safe and fit for purpose, leading to building closures.                   |                              |                       | Review of current policy of no new external borrowing agreed in principle with senior Members, with potential impact on the capital programme from 2026/27.  | John Betts    | Control          |             |                           |
| There are a number of geo-political uncertainties in the current environment which  | Delays result in additional inflationary costs.  |                              |                       | Asset safety factors associated with our assets are given priority during the budget setting process.  | John Betts    | Control          |             |                           |
|   | Funding annual rolling programmes from borrowing is unsustainable.   |                              |                       | An annual programme of planned preventative maintenance is undertaken at KCC sites by the relevant Facilities Management contract partners   | Tony Carty    | Control          |             |                           |
|   | Reputational damage as a result of building closures or any impact on service delivery.  |                              |                       | Health and Safety Team in place in advisory capacity to ensure compliance with Government and HSE guidelines.  | Maria Kelly   | Control          |             |                           |
|   |  |                              |                       | Premises Officers in place to visit schools and support them with forecasting maintenance budgets.   | Joanne Taylor | Control          |             |                           |

## Risk Register - Corporate Risk Register

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| <p>additionally impact on the financial and operating environment.</p>  |  |  |  | <ul style="list-style-type: none"> <li>• The most urgent works will be completed on the agreed, prioritised sites.</li> </ul>   | Joanne Taylor    | Control |  |  |
| <p>Inflationary pressures impact on the capital programme significantly.</p>  |  |  |  | <ul style="list-style-type: none"> <li>• Infrastructure works with Assistant Education Directors to communicate to schools regarding their obligations for maintenance and their responsibilities for repairs under financial thresholds</li> </ul>             | Joanne Taylor    | Control |  |  |
| <p>Expectations of key stakeholders on capital spend.</p>   |  |  |  | <ul style="list-style-type: none"> <li>• External funding bid for 'schools rebuilding programme' (DfE) was submitted, and successful for Birchington Primary School.</li> </ul>   | Joanne Taylor    | Control |  |  |
| <p>Risks associated with changes in legislation related to developer contributions. This could lead to a requirement for significant forward funding.</p> |  |  |  | <ul style="list-style-type: none"> <li>• Review of KCC estate – Future Assets Programme. Business cases for each of the three workstreams are being developed (Office Estate, Community Buildings, Specialist Assets) with associated consultations.</li> </ul> | Rebecca Spore    | Control |  |  |
|   |  |  |  | <ul style="list-style-type: none"> <li>• Lobbying central Government re capital grants relating to Highways.</li> </ul>   | Haroona Chughtai | Control |  |  |

# Risk Register - Corporate Risk Register

| Risk Ref   | CRR0015   | Risk Title and Event |                       |   | Assigned To   | Last Review da   | Next Review |             |                 |
|--|---|----------------------|-----------------------|---|---------------|------------------|-------------|-------------|-----------------|
| Sustainability of the Social Care Market   |   |                      |                       |   | Richard Smith | 30/04/2025       | 30/07/2025  |             |                 |
| Social Care market is not sustainable.<br>Inability to obtain the right kind of provider supply at affordable prices.<br>Significant numbers of care home closures or service failures.<br>Increases in hand backs of care<br>Providers choose not to tender for services at Local Authority funding levels or accept service users with complex needs.  |   |                      |                       |   |               |                  |             |             |                 |
| Cause  | Consequence   | Current Risk         | Previous Current Risk | Control / Action  |               | Control / Action | Target Date | Target Risk |                 |
| Local Authorities have a statutory duty to provide a viable and sustainable social care market to meet the needs of the local population who meet Care Act eligibility.<br><br>The main risks associated with care market instability are:<br>Financial – As a result of the increasing cost and complexity of demand for services and constrained local authority budgets compounded by recent inflation and the Autumn Budget announcement of increases in employers' National Insurance contributions and the National Living Wage.<br>Workforce – recruitment and retention are difficult across all grades in adult social care. Turnover is higher than other sectors. Providers struggle to compete with other sectors such as retail.<br>There are particular challenges | Gaps in the care market for certain types of care or in geographical areas meaning difficulty in placing some service users.<br>Unable to offer care packages immediately leading to delays with discharging from Health Services<br>Reduction in quality of care provided due to workforce pressures<br>Significant numbers of care home closures or service failures. | High                 |                       | • Development of micro providers market with Kate Silver partner Community Catalysts. Quarterly contract management reviews take place including focus on performance against targets (engagement and set up).  |               | Control          |             | Medium      |                 |
|  |   | 25<br>Major (5)      |                       | • Provider support team in place  |               | Paula Parker     | Control     |             | 15<br>Major (5) |
|  |   | Very Likely (5)      |                       | • Daily risk assessment for people in the community awaiting packages of care and short term bed provision for those at high risk   |               | Mark Albiston    | Control     |             | Possible (3)    |
|  |   |                      |                       | • KCC linked to ADASS South East and Kent Integrated Care Alliance monitoring of overseas worker issues   |               | Richard Ellis    | Control     |             |                 |
|  |   |                      |                       | • Engagement with Integrated Care Board around joint commissioning opportunities  |               | Richard Ellis    | Control     |             |                 |
|  |   |                      |                       | • Regular engagement with provider and trade organisations  |               | Richard Ellis    | Control     |             |                 |
|  |   |                      |                       | • Older Persons Accommodation Strategy refreshed, which analyses demand and need and sets the future vision and direction for accommodation to support vulnerable Kent residents alongside the Adult Social Care Strategy - Your Life, Your Wellbeing |               | Richard Smith    | Control     |             |                 |
|  |   |                      |                       | • Pipeline prioritisation tool is in place for Strategic Commissioning projects, shared with DivMT and Director of Strategy Policy, Relationships and Corporate Assurance   |               | Chris Wimhurst   | Control     |             |                 |

## Risk Register - Corporate Risk Register

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| <p>in Kent in home care. Overseas workers have created some additional capacity but changes in social care visa rules excluding families has reduced applications from overseas care workers. The social care visa route also attracted operators seeking to exploit that rather than support the sector. There has been an increased risk of exploitation and overseas workers have been displaced when operators have had their licences revoked. This has created a lot of additional work for ASCH in ensuring that the needs of those that draw on care and support continue to be met.</p> |  |  |  | <ul style="list-style-type: none"> <li>• Analytics function utilises data to inform decision making before moving commissioning activity forward.</li> <li>• Use of a fee negotiation tool to support fee uplift conversations with providers</li> <li>• ASCH Commissioning Intentions 2022 - 2027 - describes how we plan to create person-centred and flexible care and support options which address the challenges and opportunities adult social care faces. It supports the delivery of 'Making a difference every day' strategy 2022-2027</li> <li>• Ongoing monitoring of Home Care market and market coverage. Commissioners and operational managers review the capacity of the Home Care market with a view to developing a strategy to ensure market coverage.</li> <li>• Ongoing Contract Monitoring, working in partnership with the Access to Resources team</li> <li>• KCC is part of local and regional Quality Surveillance Groups that systematically bring together the different parts of the health and care system to share information, identify and mitigate risks to quality, including those relating to care providers.</li> <li>• New contracts commenced relating to Disability and Mental Health Residential Care services.</li> <li>• Contract for Discharge Services presented to Cabinet Committee and approved by the Cabinet Member.</li> <li>• Ensuring contracts have indexation clauses built-in, managed through contract monitoring</li> </ul> | <p>Matthew Wagner</p> <p>Simon Mitchell</p> <p>Simon Mitchell</p> <p>Simon Mitchell</p> <p>Simon Mitchell</p> <p>Simon Mitchell</p> <p>Simon Mitchell</p> <p>Michael Bridger</p> | <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> |  |  |
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Risk Register - Corporate Risk Register

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|  |  |  | <ul style="list-style-type: none"><li>Continue to work innovatively with partners, including health services, districts and boroughs, and providers to identify any efficiencies across the wider sector.</li></ul> | ASCH<br>Divisional<br>Directors | Control |  |  |
|  |  |  |   |                                 |         |  |  |



# Risk Register - Corporate Risk Register

| Risk Ref   | CRR0014   | Risk Title and Event |                       |  | Assigned To                | Last Review da | Next Review |
|--|---|----------------------|-----------------------|--|----------------------------|----------------|-------------|
| Cyber & Information Security Resilience  |   |                      |                       |  | Lisa Gannon                | 26/03/2025     | 26/06/2025  |
| Confidentiality, integrity and availability of data or systems is negatively impacted or compromised leading to loss of service, data breaches and other significant business interruptions.                       |   |                      |                       |  |                            |                |             |
| Cause  | Consequence   | Current Risk         | Previous Current Risk | Control / Action   | Control / Action           | Target Date    | Target Risk |
| Malicious (intentional) actions against KCC from individuals, cyber criminals and state sponsored attacks.   | Data Protection breach and consequent Information Commissioner’s Office (ICO) sanction.                                     | High                 |                       | • Data Protection and Information Governance training is mandatory and requires staff to refresh periodically. Progress rates monitored regularly.   | Paul Royel A -Accepted     | 30/06/2025     | High        |
|  | Damages claims.   | 20                   |                       |  |                            |                | 20          |
|  | Reputational Damage.  | Major (5)            |                       |  |                            |                | Major (5)   |
| Supply chain compromise including third party data transfers, vulnerabilities in purchased equipment and supplier system breaches.   | Potential significant impact on business interruption if systems require shutdown until magnitude of issue is investigated. | Likely (4)           |                       | • Reviewing visibility of Group risk profile regarding cyber security, to provide reassurance that the use of any shared resources or other inter dependencies from a cyber perspective are continually understood.  | James Church A -Accepted   | 30/06/2025     | Likely (4)  |
| Human error leading to staff revealing information or taking actions which assist malicious actor in being able to affect systems or data, including responding to phishing emails and losing account credentials. | Loss or corruption of data.   |                      |                       | • Data Protection and Information Governance training is mandatory and requires staff to refresh periodically. Progress rates monitored regularly.   | Benjamin Watts A -Proposed | 30/06/2025     |             |
|  | Loss of key systems potentially impacting ability to deliver statutory services.  |                      |                       | • Supply chain risk management program including keeping an inventory of all ICT suppliers and third party data transfers, cyber requirements built into procurement, regular assurance of supplier security to ISO 27001 and Cyber Essentials, and regular risk assessments carried out to identify supply chain risks. | James Church Control       |                |             |
| Compromise of physical security controls and/or infrastructure including unauthorised access to data centres, network cables and natural disaster (flood, fires etc.)  | Partners unable to discharge their duties   |                      |                       | • Security engagement, training and awareness. Ongoing program of security engagement, training and awareness, upskilling staff to reduce human error. This includes communications, e-learning and training for staff.  | James Church Control       |                |             |
| Gaps in existing resources and capabilities, including technological controls and resource challenges in providers' operational teams.   | Complaints  |                      |                       | • Frequent security audits, penetration tests and compliance submissions External review of security posture provides validation that our controls work and are being managed effectively.   | James Church Control       |                |             |

## Risk Register - Corporate Risk Register

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|  |  |  | <ul style="list-style-type: none"> <li>• Multiple layers of logical, physical and administrative security controls<br/>Defence in depth is a key cyber security concept that the Authority adheres to, involving multiple layers of security control for protection from various threats.</li> </ul>   | James Church   | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Cyber standards and risk assessment have been included into the central ICT commissioning framework</li> </ul>  | James Church   | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Internal assurance programme including audits, risk assessment and vulnerability management<br/>Completion of internal audits and assurance audits to ensure cyber is being managed effectively. Continuing to action audit recommendations via the Consolidated Security Action Plan.<br/>Risk assessments completed on new implementations to ensure that cyber risks are highlighted and treated.<br/>Vulnerability management activities to identify and treat vulnerabilities in good time.</li> </ul> | James Church   | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Investment in and implementation of new controls and technologies including capabilities of M365 E5 licenses.<br/>Cyber security threats are constantly evolving and therefore new tools and capabilities are required to keep up and mitigate the risk.</li> </ul>   | James Church   | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Additional messages warning staff of cyber threats are being sent out regularly.</li> </ul>   | Diane Christie | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Messages to encourage increased awareness of information security amongst staff are to be communicated to align with key implementation milestones of the ICT Transformation Programme.</li> </ul>  | Diane Christie | Control |  |  |

# Risk Register - Corporate Risk Register

| Risk Ref  | CRR0003  | Risk Title and Event |                       |   |   | Assigned To      | Last Review da | Next Review |                |
|---|--|----------------------|-----------------------|---|---|------------------|----------------|-------------|----------------|
| Securing resources to aid economic growth and enabling infrastructure   |  |                      |                       |   |   | Simon Jones      | 10/04/2025     | 09/07/2025  |                |
| The inability to secure sufficient funding, including contributions from development, to deliver the infrastructure necessary to support growth may require gap funding in order for KCC to fulfil its statutory duties.<br>Deferral of developer contributions and / or elongated planning consents leads to delayed or compromised infrastructure.  |  |                      |                       |   |   |                  |                |             |                |
| Cause   | Consequence  | Current Risk         | Previous Current Risk | Control / Action  |   | Control / Action | Target Date    | Target Risk |                |
| The economy in Kent & Medway has been impacted by various global events, and the impacts could be disproportionate across the county (e.g. in coastal areas). The Kent & Medway Economic Framework was developed and aims to act as a stimulus for sustainable and inclusive economic growth. The Council actively seeks to secure the resources/funding necessary to provide the infrastructure and programmes required to support growth but these are often difficult to secure. At a local level there is often a significant gap between the overall costs of the infrastructure required and the Council's ability to secure sufficient funds through the current funding systems, including Section106 contributions, Community Infrastructure Levy and other growth levers. Government spending restraint and evolving priorities may result in essential | Key opportunities for growth missed.   | High                 |                       | • Kent Design Guide to be refreshed to ensure consistency with national policy and legislation supporting the delivery of high quality design in new development.                 | Tom Marchant  | A -Accepted      | 31/07/2025     | High        |                |
|   | The Council finds it increasingly difficult to fund services and match-fund infrastructure across Kent and fully mitigate the overall impact of housing growth on KCC services and, therefore communities. | 20 Major (5)         |                       |   |   |                  |                |             | 16 Serious (4) |
|   | Kent becomes a less attractive location for inward investment and business.  | Likely (4)           |                       |   | • Local Transport Plan 5 approved by County Council and due to commence.  | Lee Burchill     | Control        |             | Likely (4)     |
|   | Our ability to deliver an enabling infrastructure becomes constrained.   |                      |                       |   | • Multi-agency Kent and Medway Employment Task Force continues to operate to tackle skills gaps, evidenced by the Local Skills Improvement Plan and support current and future labour market needs through developing the 'Get Kent & Medway Working Plan' and delivering the new 'Connect to Work' and 'Skills Bootcamps' programmes to help reduce economic inactivity and support local employers to tackle skills gaps. | Steve Samson     | Control        |             |                |
|   | Reputational risk associated with delayed delivery of infrastructure required.   |                      |                       |   |   |                  |                |             |                |
| Additional revenue costs incurred due to infrastructure delays and operational costs increasing.  |  |                      |                       | • Specific business support packages, including the Kent & Medway Business Fund, Recover Pivot & Scale, Kent & Medway Growth Hub signposting, advice and events etc.              | Steve Samson  | Control          |                |             |                |
|   |  |                      |                       | • Strong engagement of private sector through Kent and Medway Economic Partnership (KMEP), Business Advisory Board, Kent Developer Group, KMEP Sector Groups, Team Kent work etc. | Steve Samson  | Control          |                |             |                |

## Risk Register - Corporate Risk Register

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| <p>infrastructure programmes being delayed or cancelled. Central Government has recently indicated that it is minded to cease funding for post-Local Enterprise Partnership responsibilities in 2025-26 and much new funding for growth programmes is being targeted at Mayoral Combined Authority areas rather than counties - this presents a risk of short-term lack of financial resource to support economic development activity in any period prior to devolution being implemented in Kent &amp; Medway.</p> |  |  |  | <ul style="list-style-type: none"> <li>• Kent &amp; Medway Economic Framework<br/>Steve Samson<br/>A Phase 1 implementation plan has been implemented for Kent &amp; Medway Framework with KMEP sub groups and local stakeholders for taking forward the ambitions and action areas set out in the framework including developing a prioritised economic and infrastructure projects pipeline to focus and secure future funding resource and inform government of priorities. A new round of Growing Places Fund (capital loans) is being prepared to support projects that contribute to economic growth with a view to launching a first call for projects during 25-26.</li> <li>• Kent &amp; Medway Economic Framework Implementation Plan progressed. Steve Samson</li> <li>• Monitoring of socio economic data and trends and development of responses to changed economic trends through Kent &amp; Medway Economic Dashboard and new KMEP work stream data sets. Steve Samson</li> <li>• New contracts put in place to support the visitor economy and inward investment services to attract businesses to the county and bring in additional revenue for local companies. Regular contract monitoring and reporting to ensure businesses are supported. Steve Samson</li> <li>• Ensure that KCC continues to take a strategic leadership role for the Kent &amp; Medway Functional Economic Area and to liaise with key government departments to make the case for specific resource allocations to tackle barriers to growth in Kent (&amp; Medway) despite Kent not being part of the Devolution Priority Programme. Steve Samson</li> </ul> | Control |  |  |
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## Risk Register - Corporate Risk Register

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|  |  |  | <ul style="list-style-type: none"> <li>Teams across the Growth, Environment and Transport directorate work with each individual District on the preparation of an Infrastructure Delivery Plan including priorities for spending CIL receipts (where applicable) and Section 106 contributions to mitigate the impact of growth on County Council infrastructure and services.</li> </ul> | Tom Marchant          | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>Respond to Government consultations on proposals to reform the planning system in England, including the measures set out within the Planning and Infrastructure Bill and its provisions relating to the new duty to prepare Spatial Development Strategies.</li> </ul>  | Tom Marchant          | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>Infrastructure Mapping Platform has been successfully piloted in East Kent and will now be delivered across Kent and Medway setting out the infrastructure needed to deliver planned growth.</li> </ul>  | Tom Marchant          | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>The KCC Developer Contributions Guide has been updated and adopted.</li> </ul>   | Tom Marchant          | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>Regular dialogue with government departments.</li> </ul>   | Stephanie Holt-Castle | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>MasterGov (DEF Software) is used to track developer contributions from the Council's initial request for developer contributions through to the issue of invoice for payment and provides the evidence base to support the annual preparation of the Infrastructure Funding Statement.</li> </ul>  | Stephanie Holt-Castle | Control |  |  |
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## Risk Register - Corporate Risk Register

| Risk Ref  | CRR0042  | Risk Title and Event |                       |   |              | Assigned To      | Last Review da | Next Review  |
|---|--|----------------------|-----------------------|---|--------------|------------------|----------------|--------------|
| Border fluidity, infrastructure and resilience  |  |                      |                       |   |              | Simon Jones      | 09/04/2025     | 09/07/2025   |
| That changes in border customs, checking and processing routinely disrupt local communities and both the strategic and local road networks.   |  |                      |                       |   |              |                  |                |              |
| That the Government does not provide sufficient capital and revenue financial support to departments, agencies, local authorities and other infrastructure stakeholders necessary to address the necessary infrastructure, legislation and controls to ensure a long term plan for frictionless border movements. |  |                      |                       |   |              |                  |                |              |
| Cause   | Consequence  | Current Risk         | Previous Current Risk | Control / Action  |              | Control / Action | Target Date    | Target Risk  |
| Changes at the UK border with Europe means additional controls now exist on the movement of goods and people between the UK and the EU.   | Significant slowdown in the existing flow of goods and people through the Kent Ports leads to long delays in accessing the Port of Dover and Eurotunnel.   | High                 |                       | • KCC contributes to the Kent & Medway Resilience Forum Operation Fennel Plan, and other multi-agency plans and capabilities relating to traffic management.  | Toby         | Control          |                | Medium       |
|   |  | 20                   |                       |   |              |                  |                | 12           |
|   |  | Major (5)            |                       | • Working with Government to develop short, medium and long-term plans & capabilities for border resilience, including infrastructure and technological solutions.  | Toby         | Control          |                | Serious (4)  |
|   |  | Likely (4)           |                       |   |              |                  |                | Possible (3) |
| The UK Government and the EU have introduced new border controls and further changes are being introduced including the new Entry/Exit System (EES) and European Travel Information and Authorisation system (ETIAS).   | Impacts on strategic traffic routes as a result of Operation Brock and other traffic management measures, leading to an increase in local and pan Kent road journey times, impacting communities and businesses. |                      |                       | • Regular presentations to Cabinet Committee on potential impacts relating to people and goods.   | Simon Jones  | Control          |                |              |
|   |  |                      |                       | • Regular engagement with senior colleagues in relevant Government Departments.   | Simon Jones  | Control          |                |              |
| KCC has been working with partners at a local and national level to assess potential implications for the county and prepare for various scenarios.   | Significant detrimental impact on the county's economic competitiveness, attractiveness for inward investment and quality of life for Kent residents.  |                      |                       | • KCC are the lead agency for EES, coordinating other responding agencies in the Kent and Medway Resilience Forum to prepare for the impacts of EES.  | Andy Jeffery | Control          |                |              |
|   |  |                      |                       | • Work with Government departments to secure funding to support improving access to the borders.  | Andy Jeffery | Control          |                |              |
| KCC is reliant on coherent, coordinated governance and information across Government to aid the Local Authority and partners locally in planning their contingency arrangements and responding  | Significant increase in imported goods subject to statutory checks by Trading Standards including consumer goods and animal feeds.   |                      |                       | • Preparation for impacts of two separate but interconnected schemes that will affect non-EU citizens travelling to most EU countries; implementation of the EU Entry/Exit System (EES) system and the EU European Travel Information and Authorisation System (ETIAS). | Andy Jeffery | Control          |                |              |
|   |  |                      |                       |   |              |                  |                |              |
|   | Imported animals now subject to welfare checks at Border controls posts, breaches of welfare subject to investigation by   |                      |                       | • A KCC EES meeting planning structure has been implemented which manages EES on behalf of CDRF.  | Andy Jeffery | Control          |                |              |

## Risk Register - Corporate Risk Register

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| appropriately.   | Trading Standards.   |  |  | <ul style="list-style-type: none"> <li>The annual KCC Resilience Training &amp; Exercising Programme allows for staff training and testing (and review of) internal KCC business continuity and incident response plans.</li> </ul>  | Andy Jeffery     | Control |  |  |
| KCC continues to work with Kent & Medway Resilience Forum (KMRF) partners and government in anticipation of the new implementation date for EES. This is dependent on revised EU legislation allowing for a phased introduction of the levels of checks over a period of several months, anticipated to begin at some point between May & November 2025. | <p>Shortages and delay may impact supply chains.</p> <p>Interruption and effect on business services, both statutory and discretionary, such as:<br/>Adult's and children's social care workers being able to reach necessary areas.<br/>Care homes in the affected areas.<br/>Officers and Community Wardens working in affected areas and those officers who live in affected areas but deliver face to face services.<br/>Critical infrastructure including schools, KCC buildings and other KCC responsible areas.</p> |  |  | <ul style="list-style-type: none"> <li>A KCC EES internal comms plan has been created and implemented throughout the phases of work completed in preparation for EES. The comms plan provides communication with staff via direct and group email, KNet and the various meeting structures. The frame of the comms plan is general information, business continuity and ensuring managers are aware of all necessary actions to support their teams and includes: <ul style="list-style-type: none"> <li>- EES border procedures overview</li> <li>- BCP testing requirements</li> <li>- Training exercises in preparedness for impacts of EES</li> <li>- FAQs</li> <li>- General health and safety messaging</li> <li>- Traffic information</li> <li>- Ongoing updates on EES implementation and impacts</li> </ul> </li> </ul> | Diane Christie   | Control |  |  |
|  |  |  |  | <ul style="list-style-type: none"> <li>KCC lead in planning, response and recovery phases and support multi-agency communications in the event of a major emergency.</li> </ul> <p>There are four external comms plans in place, as follows:</p> <ul style="list-style-type: none"> <li>- KCC EES Communications Plan (reviewed monthly)</li> <li>- KMRF Media and Comms Plan (reviewed annually)</li> <li>- Driver Welfare Comms Plan (reviewed twice a year)</li> <li>- Media and Comms Group (set up as required)</li> </ul>  | Christina Starte | Control |  |  |

Risk Register - Corporate Risk Register

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|  |  |  | <ul style="list-style-type: none"><li>• KCC services are continually reviewing business continuity arrangements, taking potential scenarios into consideration, with co-ordination via Directorate Resilience Groups.</li></ul> | Service Managers | Control |  |  |
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# Risk Register - Corporate Risk Register

| Risk Ref  | CRR0064  | Risk Title and Event          |                       |   |               | Assigned To      | Last Review da | Next Review                     |
|---|--|-------------------------------|-----------------------|---|---------------|------------------|----------------|---------------------------------|
| Risk of Failing to Deliver Effective Adult Social Care Services   |  |                               |                       |   |               | Richard Smith    | 30/04/2025     | 30/07/2025                      |
| Impact on outcomes for people who draw on care and support and unpaid carers  |  |                               |                       |   |               |                  |                |                                 |
| Potential that people will come to harm and the Council will be unable to ensure that their safeguarding statutory duty under S.42 of the Care Act 2014 will be fully met.  |  |                               |                       |   |               |                  |                |                                 |
| Non-compliance with Care Act 2014, the Mental Health Act 1983, the Mental Capacity Act 2005 and associated legislation, and the regulatory requirements of the Care Quality Commission.   |  |                               |                       |   |               |                  |                |                                 |
| Cause   | Consequence  | Current Risk                  | Previous Current Risk | Control / Action  |               | Control / Action | Target Date    | Target Risk                     |
| The Council is at risk of failing to deliver effective Adult Social Care services and there is the potential to not meet requirements of statutory services under the Care Act 2014, the Mental Health Act 1983, the Mental Capacity Act 2005 and associated legislation, and the regulatory requirements of the Care Quality Commission.<br><br>The Council has been impacted by:<br>- continued central government funding restraint<br>- Demographic changes<br>- Increased demand for services<br>- Demand led statutory services which can be difficult to predict<br>- Increasing costs due to increasing complexity of health and social care needs.<br>- Increasing costs due to cost of living | Failure to fulfil our duty of care could result in serious harm or detriment or in extremely rare cases death to a person with significant impact on families, carers and support networks. This could in turn result in prosecution, having to pay compensation and a negative impact on the reputation of the Council. | High                          |                       | • ASC SMT have established monthly meetings with connect2Kent to ensure we proactively monitor the timely deployment of key interim personal into statutory front line roles. This started about 6 months ago and an ongoing arrangement.   | Mark Albiston | Control          |                | Medium                          |
|   | Reputational impact. Public perception of the council being willing to accept poor standards of care. Low public confidence in social care   | 20<br>Major (5)<br>Likely (4) |                       | • Adult Social Care (ASC) directorate has developed comprehensive performance management tools that help identify and targeted weekly action to reduce the length of time people are having to wait for Care Needs Assessments (CNAs), reviews, open safeguarding concerns, open safeguarding risk assessments, open safeguarding enquiries. Weekly emails (for action) are sent to assistant directors and monitored through governance and assurance meetings. (already in place and ongoing) | Mark Albiston | Control          |                | 15<br>Major (5)<br>Possible (3) |
|   | A loss of trust in the Council's ability to safeguard people who live in Kent.   |                               |                       | • Adult Social Care Connect (changes to our front door) will be rolled out from 14th October 2024 with a focus on developing strength based care act assessments at first point of contact  | Mark Albiston | Control          |                |                                 |
|   | Overspending on the budget which may impact the wider council.   |                               |                       |   |               |                  |                |                                 |

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| <p>pressure/inflation/interest rates/utilities.</p> <ul style="list-style-type: none"> <li>- increasing costs from social care market providers</li> <li>- recruitment and retention of staff</li> <li>- recovering from the impacts of the Covid-19 pandemic on the sector, including the NHS Recovery Plan</li> </ul> |  |  |  | <ul style="list-style-type: none"> <li>• Workforce is structure around two key areas of practice: Director and Assistant Director roles are aligned to the structure.<br/>(a) prevention, early intervention, and short term support<br/>(b) long term support and adult safeguarding.</li> </ul>  | Mark Albiston | Control |  |  |
|   |  |  |  | <ul style="list-style-type: none"> <li>• Safeguarding adults' improvement plan agreed by DMT in September 2024 and progress will be monitored by DMT</li> </ul>  | Mark Albiston | Control |  |  |
|   |  |  |  | <ul style="list-style-type: none"> <li>• ASC have commissioned a managed service to undertake targeted statutory safeguarding enquiries focus on people with longest wait times</li> </ul>   | Mark Albiston | Control |  |  |
|   |  |  |  | <ul style="list-style-type: none"> <li>• ASC have commissioned a managed service to undertake an initial 650 targeted reviews in TSCK and West Kent.</li> </ul>  | Mark Albiston | Control |  |  |
|   |  |  |  | <ul style="list-style-type: none"> <li>• Minimum targets for completed CAN's and reviews per full time worker per week have been established and this is supported by a forward look productivity tool to evidence how ASC will reduce the number of people and time they have to wait for an assessment of their needs, and or review (in place since April 2024)</li> </ul>  | Mark Albiston | Control |  |  |
|   |  |  |  | <ul style="list-style-type: none"> <li>• ASC have set out transformation and sustainability business plans which sets out the actions we will take to (a) prevent, reduce, and delay needs for care and support at the first point of contact through new models of care and support (b) drive our approach to new models of care and support (sustainability) following individual reviews. These have been in place since April and are due for mid-point review.</li> </ul> | Mark Albiston | Control |  |  |

# Risk Register - Corporate Risk Register

| Risk Ref   | CRR0068  | Risk Title and Event          |                       |   |               | Assigned To      | Last Review da | Next Review                       |
|--|--|-------------------------------|-----------------------|---|---------------|------------------|----------------|-----------------------------------|
| Delivery Against Safety Valve Agreement  |  |                               |                       |   |               | Sarah Hammond    | 18/06/2025     | 18/09/2025                        |
| Inability to manage within budget and reduce accumulated deficit on Dedicated Schools Grant reserve and the statutory override on the deficit is lifted<br>Failure to meet the terms of the Safety Valve agreement.  |  |                               |                       |   |               |                  |                |                                   |
| Cause  | Consequence  | Current Risk                  | Previous Current Risk | Control / Action  |               | Control / Action | Target Date    | Target Risk                       |
| There has been a significant increase in the number of children receiving Special Educational Needs and Disability support and the Council’s Dedicated Schools Grant (DSG) budget is overspending on the High Needs Block. Continued funding of the deficit on the DSG reserve by net surplus balances in other reserves is unsustainable, and a continuance of the situation would negatively impact the financial resilience of the Council. Consequently, meeting the needs of children and young people with SEND within available resources is becoming ever more challenging and the ability to forecast costs in future years is difficult. Funding has not kept pace with the rise in demand and three quarters of local authorities have deficits in their DSG grant budget as a result of High Needs cost pressures. | In the event Kent County Council fails to adequately address the Dedicated Schools Grant deficit, including failing to meet the terms of the Safety Valve agreement, there would be:<br>Major Financial Risk: Inability to manage within budget and reduce accumulated deficit on Dedicated Schools Grant reserve would result in adverse impact on the financial resilience of Kent County Council.<br>Major Service Provision Risk: Children with SEND do not meet sufficient progress within the available financial resource. Adverse impact on outcomes for vulnerable children and young people.<br>Significant Reputation Risk: Dissatisfaction from families and potential for adverse press at a local level. | High                          |                       | • KCC has entered into a “Safety Valve” agreement with the Department for Education (DfE), enabling Kent County Council (KCC) to receive funding over a 5-year period to substantially fund the accumulated deficit on the Dedicated Schools Grant (DSG) High Needs Block (HNB). The agreement requires commitment to areas of review and improvement identified by Department for Education (DfE) to bring in year spend in line with the in-year budget by 2027/28. A financial contribution from the Council is also expected. | John Betts    | Control          |                | Medium                            |
|  |  | 20<br>Major (5)<br>Likely (4) |                       | • Continual lobbying of Government on two matters; increased funding in both the short and medium term, and structural changes to government policy to help reduce the demand i.e. via County Council Network, Association of Directors of Children’s Services. Includes provision of evidence of the impact of the High Needs pressures on the quality of education children receive, schools, other providers and the Local Authority.  | Sarah Hammond | Control          |                | 12<br>Serious (4)<br>Possible (3) |

Risk Register - Corporate Risk Register

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| <p>The long term outcomes for young adults with SEND and having had an EHCP remain negatively unremarkable when benchmarked against the costs of maintaining those EHCPs. 55% of all ECHPs ceased for 20-25 year olds were stepped down due to the young adult not wishing to continue with education or training AND not being in work, Higher Education training or apprenticeship.</p> <p>To address the situation, Kent County Council entered the DfE Safety Valve programme March 2023 covering the financial years 2022-2023 to 2027-2028. The Council will need to bring High Needs spending back into balance over the medium term and contribute to repaying the historic deficit.</p> |  |  |  |  |  |  |
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# Risk Register - Corporate Risk Register

| Risk Ref   | CRR0059  | Risk Title and Event |                       |  |  | Assigned To      | Last Review da | Next Review     |
|--|--|----------------------|-----------------------|--|--|------------------|----------------|-----------------|
| Risk of significant adverse variance to the level of savings and income agreed in KCC’s budget.  |  |                      |                       |  |  | John Betts       | 09/04/2025     | 31/07/2025      |
| Risk of significant adverse variance to the level of savings and income agreed in KCC's budget.  |  |                      |                       |  |  |                  |                |                 |
| Spending growth pressures significantly exceeds forecasts.   |  |                      |                       |  |  |                  |                |                 |
| Cause  | Consequence  | Current Risk         | Previous Current Risk | Control / Action   |  | Control / Action | Target Date    | Target Risk     |
| The Council is under a legal duty to set a balanced and sustainable budget and maintain adequate reserves such that it can deliver its statutory responsibilities and priorities.<br><br>The most significant savings requirements are in adult social care.<br><br>Urgent action is required to ensure revenue spending is at a sustainable level, both within the current financial year 2025-26 and over the medium term (see CRR0009) to safeguard the council's financial resilience and viability. | The level of reserves as % of revenue and sustainability of reserves based on recent levels of drawdown put the council at the top of the lower quartile of county councils.                   | High                 | 25                    | • Council’s Budget Strategy, linked to Securing Kent’s Future, confirmed at County Council Budget meeting in February 2024 and confirms key principles to abide by.  |  | John Betts       | Control        | Medium          |
|  |  | 16                   | ↓                     |  |  |                  |                | 9               |
|  |  | Serious (4)          | -9                    |  |  |                  |                | Significant (3) |
|  |  | Likely (4)           |                       | • Finance and performance monitoring progress reports will be considered at Cabinet meetings to ensure the focus on Securing Kent’s Future remains until the council's financial position is stabilised.   |  | John Betts       | Control        | Possible (3)    |
|  | Council reserves further depleted below a sustainable position.  |                      |                       | • Budget monitoring will continue to include a full report on all budgets on a quarterly basis with exception reports in the intervening months focussing on the largest and most volatile areas of spending.                                    |  | John Betts       | Control        |                 |
|  | Impact on service delivery.  |                      |                       | • Savings delivery plans and monitoring processes in place.  |  | John Betts       | Control        |                 |
|  | More imminent danger of financial failure – ultimately requesting Exceptional Financial Support from Government, or issuing of section114 notice by Corporate Director Finance (s151 Officer). |                      |                       | • Analysis and enhancements to financial reporting introduced to better identify the underlying drivers for the main budget variances and the impacts and dependencies of management action and policy choices to reduce the forecast overspend. |  | John Betts       | Control        |                 |
|  | Negative impact on MTFP three year plan.   |                      |                       | • The Council's Financial Regulations (and delegation levels within), “Spending the Council’s Money” and Code of Corporate Governance, to ensure they remain fit for purpose in the current environment.   |  | John Betts       | Control        |                 |

## Risk Register - Corporate Risk Register

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|  |  |  | <ul style="list-style-type: none"> <li>• Robust delivery plan information developed for 2025/26, particularly with ASCH – milestones, risks, dependencies etc with Strategic Reset Board oversight.</li> </ul>  | Dave Shipton              | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• To maximise scope of effective scrutiny by all Members, there has been a review of meetings and agendas to ensure appropriate focus on core activity on the budget, key decisions and performance relating to “Securing Kent’s Future”, including regular finance update reports to Cabinet, Scrutiny Committee and Policy and Resources Committee.</li> </ul> | Benjamin Watts            | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Regular Strategic Reset Programme (SRP) engagement with Directors following approval of delivery plans in April 2025.</li> </ul> <p>Monthly presentation of delivery plan monitoring and exceptions to the SRP Programme Board for April to June and then to be reviewed.</p>  | Brett Appleton            | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Analytics function used to undertake detailed analysis of the main areas of overspend.</li> </ul>  | Matthew Wagner            | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Equality Impact Assessment screening will be completed for any alternative and / or additional savings necessary under the recovery plan.</li> </ul>   | Corporate Management Team | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Budget Recovery Plan - Securing Kent’s Future - developed to outline a pathway to future financial sustainability. This includes focusing predominantly on the material spending areas of council activity and those with the greatest forecast variances from the approved budget.</li> </ul>   | Corporate Management Team | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Any adverse variations to agreed savings / income are swiftly identified with compensating actions agreed with management.</li> </ul>  | Corporate Management Team | Control |  |  |

Risk Register - Corporate Risk Register

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|  |  |  |  | <div>• Resource Accountability Statements signed off by Corporate Directors.</div> | Corporate Management Team | Control |  |  |
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# Risk Register - Corporate Risk Register

| Risk Ref   | CRR0058   | Risk Title and Event |                       |   | Assigned To                | Last Review da | Next Review       |
|--|---|----------------------|-----------------------|---|----------------------------|----------------|-------------------|
| Capacity and capability of the workforce   |   |                      |                       |   | Paul Royel                 | 18/06/2025     | 18/09/2025        |
| Workforce capacity challenges - insufficient staff to meet service demands.  |   |                      |                       |   |                            |                |                   |
| Capacity pressures within the management, and leadership teams potentially impacting time for reflection and decision making.  |   |                      |                       |   |                            |                |                   |
| Impact on budgets from use of agency staff/contractors to fill roles to support service delivery.  |   |                      |                       |   |                            |                |                   |
| There is a risk that services may not have the capacity to deal with the additional demand and associated cost pressures or may have to reduce quality to meet the need.   |   |                      |                       |   |                            |                |                   |
| Complaints from Kent residents   |   |                      |                       |   |                            |                |                   |
| Lack of depth / resilience of key personnel or teams.  |   |                      |                       |   |                            |                |                   |
| Cause  | Consequence   | Current Risk         | Previous Current Risk | Control / Action  | Control / Action           | Target Date    | Target Risk       |
| KCC is experiencing increasing demand for services due to whole system pressures which placing pressure on the existing capacity of the workforce.<br><br>As a result of the complexity and volatility of issues being faced in the organisation, capacity within the management, and leadership teams is stretched.<br><br>Increasing complexity of issues being faced by KCC require capable and experienced officers with potentially different skill sets.<br><br>The financial position of the Council limits the ability to manage in spikes operational | Adverse impact on productivity  | High                 |                       | • Review spans and layers of management in order to make sure we have the right people in the right places doing the right things.  | Paul Royel A -Accepted     | 30/04/2026     | Medium            |
|  | Negative impact on performance and / or delivery of statutory functions or services.                      | 16<br>Serious (4)    |                       | • Promote learning opportunities including the coaching network, webinars and networking opportunities.   | Paul Royel A -Accepted     | 30/04/2026     | 12<br>Serious (4) |
|  | Lack of experienced staff with specialist skills  | Likely (4)           |                       | • Post implementation review of pay strategy to ensure it remains competitive and sustainable for the future.   | Ian Allwright A -Accepted  | 30/04/2026     | Possible (3)      |
|  | Reliance on interim and agency staff potentially impacting stability of teams and consistency of service. |                      |                       | • Promote the reward and recognition mechanism in place as part of communications about our new Pay Strategy, including individual recognition for exceptional work and the employee package. | Ian Allwright A -Accepted  | 30/04/2026     |                   |
|  | Inability to progress service development.  |                      |                       | • Review our good conversation tool to look in more depth about the way career development conversation can be supported.   | Kirsty Ireland A -Accepted | 30/04/2026     |                   |
|  | Low staff morale and negative impact on wellbeing, potentially leading to burn out.                       |                      |                       | • Targeted advice, support and interventions available via HR business partners for areas of particular recruitment / retention concern relating to key roles.                                | Paul Royel Control         |                |                   |
|  | Loss of discretionary effort/goodwill.  |                      |                       |   |                            |                |                   |



## Risk Register - Corporate Risk Register

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| <p>demand by way of recruitment.</p> <p>To support capacity, use of agency staff is increasing.</p> <p>Newly qualified professionals in services require adequate time and support from senior officers, which has secondary capacity impacts.</p> <p>Impacts of supporting secondments on teams and services with limited capacity or on difficult to resource roles.</p> <p>As well as national skills shortages in key areas, attracting suitably qualified, skilled and experienced staff, and retaining them to ensure sufficient capacity and capabilities to deliver services continues to be reported as a challenge across directorates. This is influenced by internal and external factors such as the financial position of the Council, local and national elections and the subsequent political uncertainty.</p> | <p>Impact on delivery of projects to expected time scales.</p> <p>Employer and Service Reputational damage</p> <p>Negative impact on budgets and savings plans</p> |  | <ul style="list-style-type: none"> <li>• Workforce planning and appropriate career development and succession planning mechanisms in place. Paul Royel</li> <li>• Delivery of the People Strategy for 2022 2027 approved by Personnel Committee Paul Royel</li> <li>• KCC's Organisation Design principles set out and periodically refreshed and monitored to ensure they remain fit for purpose. Paul Royel</li> <li>• Workforce profile report for the Personnel Committee gives detailed analysis on staffing levels and provides comparator information on previous years – now being provided more regularly to Personnel Committee for Member oversight and scrutiny. Paul Royel</li> <li>• Communication, implementation and measurement of the impact of the People Strategy. Paul Royel</li> <li>• Delivery of the Change Support Hub to provide suite of tools, knowledge, models, videos and change related resources to support leaders, managers, staff, and project delivery teams. The aim of the Change Hub is to aid employees to build change understanding and skills at a time right for them, to support the delivery of KCC ambitions through its many change programmes. Janet Hawkes</li> <li>• Delivery of Management Development activities to provide clarity and guidance for KCC managers on their responsibilities and accountabilities, including focus on key areas, such as digital, hybrid, equality, inclusiveness. Janet Hawkes</li> <li>• Regular staff survey conducted, followed by facilitation of engagement and action plans with senior management. Includes predictive analytics to explore key drivers of intention to leave to enable appropriate responses to develop. Diane Christie</li> </ul> | <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> |  |  |
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Risk Register - Corporate Risk Register

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|  |  |  | <ul style="list-style-type: none"><li>• Exit and retention surveys in place to identify drivers for both leavers and for those who chose to stay</li><li>• Promoting even more regular communications between managers and their teams while working remotely via "Good Conversations" tools etc.</li><li>• Communications and engagement campaigns will be delivered to support the implementation and embedding of People Strategy priorities. In particular, building awareness, understanding and use of our employee package will support staff retention.</li><li>• Implementation of action plans arising from latest staff survey.</li></ul> | Diane Christie            | Control |  |  |
|  |  |  |  | Diane Christie            | Control |  |  |
|  |  |  |  | Kirsty Ireland            | Control |  |  |
|  |  |  |  | Corporate Management Team | Control |  |  |

# Risk Register - Corporate Risk Register

| Risk Ref   | CRR0045   | Risk Title and Event |                       |  |               | Assigned To      | Last Review da | Next Review  |
|--|---|----------------------|-----------------------|--|---------------|------------------|----------------|--------------|
| Maintaining effective governance and decision making in a challenging financial and operating environment.   |   |                      |                       | Amanda Beer  |               | 05/06/2025       | 05/09/2025     |              |
| <p>Members are unwilling or unable to agree necessary policy (service) decisions within required timescales to deliver a legally balanced budget and sustainable medium term financial plan (MTFP).</p> <p>Members agree a budget requiring unrealistic and undeliverable efficiency savings leading to significant in year overspends.</p> <p>Statutory officers (S151, Monitoring Officer, Head of Paid Service) are required to use their powers to intervene or alert the Council to inappropriate/illegal decision making.</p>  |   |                      |                       |  |               |                  |                |              |
| Cause  | Consequence   | Current Risk         | Previous Current Risk | Control / Action   |               | Control / Action | Target Date    | Target Risk  |
| The continuation of a challenging financial and operating environment for Local Government (see risk CRR0009) will require difficult policy decisions to be made in a timely manner, which requires continued effective governance and decision making as well as robust internal control mechanisms. Examples from other local authorities has shown the impact that ineffective decision making can have on financial resilience. KCC’s constitution explicitly references the demarcation of Member and Officer roles, which consequently places dependency on the effectiveness of the member governance of the Council. | Decisions challenged under judicial review on the appropriateness of the decision-making within KCC. Monitoring Officer / Head of Paid Service statutory report to Council. Reputational damage to the Council. Section 114 Notice issued by the Section 151 Officer. | High                 |                       | • Medium Term Financial Plan and Budget Book agreed by Full Council and support/briefings provided for all political groups by officers on budget development options  | John Betts    | Control          |                | Medium       |
|  |   | 16                   |                       |  |               |                  |                | 10           |
|  |   | Serious (4)          |                       |  |               |                  |                | Major (5)    |
|  |   | Likely (4)           |                       | • Effective internal audit arrangements in place and robust monitoring arrangements for the delivery of internal audit recommendations to Governance & Audit Committee   | John Betts    | Control          |                | Unlikely (2) |
|  |   |                      |                       | • Appropriately detailed and timely financial monitoring reports considered by Cabinet and Cabinet Committees  | John Betts    | Control          |                |              |
|  |   |                      |                       | • Governance reviews from across the Local Government sector are analysed to identify any lessons learned and reported to relevant stakeholders, including Governance & Audit Committee.   | John Betts    | Control          |                |              |
|  |   |                      |                       | • Appropriate officer development and training programme in place and overseen by CMT  | Paul Royel    | Control          |                |              |
| In October 2023 the External Auditors issued a report on governance arrangements at the Council, which identified 22 recommendations including around strategic arrangements   |   |                      |                       | • Budget Recovery Strategy - Securing Kent's Future - set, to address the in-year and future years' financial pressures the council is facing and the specific and broader action that can be taken to return the council to financial sustainability. | Amanda Beer   | Control          |                |              |
|  |   |                      |                       | • Appropriate performance reporting of service and corporate performance to Cabinet, Cabinet Committee and Full Council  | David Whittle | Control          |                |              |

## Risk Register - Corporate Risk Register

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| <p>for delivering priorities, effective challenge to and scrutiny of decisions and the Councils structure, systems and behaviours.</p> <p>The External Auditors referred to their October 2023 report in their Annual Report of 2022/23, raising a key recommendation in regard to significant weaknesses in arrangements for governance, and noted that the same recommendation had been made in 2021/22. This was supported by findings in the Monitoring Officers annual governance statement who has noted that improvements need to be made if governance is to be effective, in both the 2021/22 and 2022/23 reports.</p> <p>The external auditor stated that that there have been areas of improvement during the year including workshops, review of written governance processes and a Member development survey, however they also concluded that the culture, behaviours and standards should also keep pace with improvement work.</p> |  |  | <ul style="list-style-type: none"> <li>• Appropriate and effective corporate risk management procedures in place for the Council<br/>David Whittle</li> <li>• Operating standards for KCC officers that support KCC's constitution published on KNet, signposting officers to essential policy information and additional guidance on specific topics, to help officers discharge their responsibilities effectively.<br/>David Whittle</li> <li>• Informal governance arrangements authorised by the KCC Constitution have been published on KNet as a practical guide for how officers work with elected Members to help them support effective decision making for our service users, residents and communities.<br/>David Whittle</li> <li>• Regular reporting to Governance &amp; Audit Committee of implementation of the actions identified within Annual Governance Statements, and actions raised at Governance and Audit Committee, in addition Members and key stakeholders have access to PowerBi suite which captures all actions and progress to date.<br/>Benjamin Watts</li> <li>• Key and significant decision-making process in place for Executive decisions and appropriately published Forward Plan of Executive Decisions<br/>Benjamin Watts</li> <li>• Annual Governance Statement (AGS) arrangements in place with returns made across both senior and statutory officers<br/>Benjamin Watts</li> <li>• Democratic Services support effective Committee governance and scrutiny arrangements.<br/>Benjamin Watts</li> <li>• Member and Officer codes of conduct in place and robustly monitored and enforced<br/>Benjamin Watts</li> <li>• Member development and training programme in place and overseen by Selection and Member Services Committee<br/>Benjamin Watts</li> </ul> | <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> |  |  |
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## Risk Register - Corporate Risk Register

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|  |  |  | <ul style="list-style-type: none"> <li>• Completion of the activities required, including the review of the Constitution, to ensure that the Chief Executive Officer (CEO) has a fit for purpose support and governance structure (as agreed by the County Council) to continue the effective discharge of duties.</li> </ul> | Benjamin Watts | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Following the publication of the 2021/22 AGS, a dedicated team was assembled within the Governance, Law and Democracy function to improve the awareness and application of governance and decision making across the council.</li> </ul>   | Benjamin Watts | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Provision for Chief Officers to seek written direction from Executive Members within the KCC Constitution</li> </ul>   | Benjamin Watts | Control |  |  |
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# Risk Register - Corporate Risk Register

| Risk Ref   | CRR0052  | Risk Title and Event |                       |   |  | Assigned To | Last Review da   | Next Review |             |              |
|--|--|----------------------|-----------------------|---|--|-------------|------------------|-------------|-------------|--------------|
| Adaptation of KCC Services to Climate Change impacts.  |  |                      |                       |   |  | Simon Jones | 09/05/2025       | 09/08/2025  |             |              |
| There is a risk that a failure to adapt KCC services to climate change leads to adverse impacts on and increased costs to the Council, as a result of damage to or loss of physical and financial assets, staff sickness and lower productivity, transport disruption, and others. |  |                      |                       |   |  |             |                  |             |             |              |
| Cause  | Consequence  | Current Risk         | Previous Current Risk | Control / Action  |  |             | Control / Action | Target Date | Target Risk |              |
| A lack of adaptation by the Council services (including those delivered and commissioned by KCC) to climate change as a result of inadequate planning and a lack of resourcing.  | KCC bears significant financial costs due to the destruction/deterioration of its assets and services. Services responsible for the safety and wellbeing of staff and the general public are placed under greater demand for their services, resulting in greater expenditure and lower productivity. Kent's residents experience a decline in the quality of services that KCC provides across the county, leading to customer dissatisfaction and reputational damage. | High                 |                       | • Delivery of the KCC Climate Change Adaptation Plan (including service level climate change adaptation risks and incorporating climate adaptation into project and BAU activity delivery, etc.). |  |             | Helen Shulver    | A -Accepted |             | Medium       |
|  |  | 16                   |                       | • Building environmental risks into KCC project work and the delivery of the KCC Environment Plan.  |  |             | Helen Shulver    | A -Accepted |             | 12           |
|  |  | Serious (4)          |                       | • Delivery of KCC's Net Zero Plan (2030).   |  |             | Helen Shulver    | Control     |             | Serious (4)  |
|  |  | Likely (4)           |                       | • Strategic Statement – Priority 3 re Environment   |  |             | Matthew Smyth    | Control     |             | Possible (3) |
|  |  |                      |                       | • Delivery of the Kent Environment Strategy and Energy and Low Emissions Strategy.  |  |             | Matthew Smyth    | Control     |             |              |
|  |  |                      |                       | • Estate rationalisation and building in additional measures to reduce emissions.   |  |             | Rebecca Spore    | Control     |             |              |
|  |  |                      |                       | • ISO 14001 accreditation (the international standard for Environmental Management Systems) implemented and maintained  |  |             | Matthew Williams | Control     |             |              |
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# Risk Register - Corporate Risk Register

| Risk Ref   | CRR0066  | Risk Title and Event |   |  |               | Assigned To      | Last Review da | Next Review  |
|--|--|----------------------|---|--|---------------|------------------|----------------|--------------|
| ASCH recommissioning programme   |  |                      |   |  |               | Richard Ellis    | 14/04/2025     | 14/07/2025   |
| Commissioning activity not delivered within expected timescales  |  |                      |   |  |               |                  |                |              |
| Cause  | Consequence  | Current Risk         | Previous Current Risk   | Control / Action   |               | Control / Action | Target Date    | Target Risk  |
| The current contractual arrangements for: Older Persons Residential & Nursing (OPRN £209m extended contract ends 31/3/2026), Care & Support in the Home (CSIH £71m extended contract ends 31/3/2027), LD/PD/MH residential care – (£148m extended contract ends 14/6/2026) and Supported Living (£180m extended contract ends 14/6/2027) do not meet the services needs nor its ambitions. For example, they do not give sufficiency of supply, leading to use of off-framework providers with loss of control of quality and price; there is overuse of care home placements because alternatives do not meet needs; and there is a disconnect between the commissioning intentions and operational practice. Care Act duties sit with KCC, not providers, who can choose whether to accept a person into their care or not, which creates a power imbalance. | ASC spend is not optimised and outcomes are poorer than they might be.   | High                 |   | • Continuing with the micro enterprise market development work to create more diverse supply and alternative workforce   |               | Kate Silver      | Control        | Medium       |
|  | The ASC overspend is directly impacted if the Council has to spend money in the wrong places and at higher cost. | 16                   |   |  |               |                  |                | 8            |
|  | We are supporting more people in care home than in a home of their own.  | Serious (4)          |   | • Open framework approach to allow more new providers to join  |               | Richard Ellis    | Control        | Serious (4)  |
|  | Savings targets are not being met in part because of the constraints of the current contracts.                   | Likely (4)           |   | • Reinforce the right to transfer packages of care from providers who choose not to join the framework   |               | Richard Ellis    | Control        | Unlikely (2) |
|  |  |                      |   | • The recommissioning activities are complex and potentially high risk and therefore part of the Council's Strategic Reset Programme (SRP) and so receive support to ensure they are delivered successfully. Regular progress updates are provided to the Strategic Reset Programme Board. |               | Richard Ellis    | Control        |              |
|  |  |                      |   | • Recruitment of 3 x experienced commissioners to focus on the delivery of the recommissioning projects - ring fenced from day to day commissioning activities.  |               | Richard Ellis    | Control        |              |
|  |  |                      |   | • Engagement with the care sector regarding specifications and proposed contract terms   |               | Richard Ellis    | Control        |              |
|  |  |                      |   | • Fixed price model banded by category of need, with ranges reflective of the increasing demands of delivery   |               | Richard Ellis    | Control        |              |
|  |  |                      | • Activities in place to restrict the use of off framework placements: Provider order of approach Finance monthly monitoring Exceptions are agreed by Assistant Directors |  | Richard Ellis | Control          |                |              |

Risk Register - Corporate Risk Register

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| <p>Whilst local authority is half of the sectors income source, providers may choose to work with the NHS and private fee payers only.</p> <p>The timescales to deliver these large programmes of work concurrently present capacity challenges for the commissioning team.</p> <p>The current market conditions and sentiment is generally negative in relation to local authorities in general and KCC in particular.</p> <p>The impact of the Autumn Budget is likely to be profound, with the potential for more providers to seek to exit completely or exit local authority business.</p> |  |  |  |  |  |  |
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## Risk Register - Corporate Risk Register

| Risk Ref   | CRR0039  | Risk Title and Event |                       |  | Assigned To    | Last Review da   | Next Review |                 |
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| Information Governance   |  |                      |                       |  | Benjamin Watts | 02/04/2025       | 02/07/2025  |                 |
| Failure to embed the appropriate processes, procedures and behaviours to meet regulations.<br>Failure to meet regulatory reporting deadlines. KCC is currently not meeting reporting requirements for SAR and FOI requests.<br>Information security incidents (caused by both human error and / or system compromise) resulting in loss of personal data or breach of privacy / confidentiality.<br>Council accreditation for access to government and partner ICT data, systems and network is withdrawn.<br>Providers and or suppliers processing KCC data fail to embed the appropriate processes and behaviours.<br>Poor data quality negatively impacts AI algorithms   |  |                      |                       |  |                |                  |             |                 |
| Cause  | Consequence  | Current Risk         | Previous Current Risk | Control / Action   |                | Control / Action | Target Date | Target Risk     |
| The Council is required to maintain the confidentiality, integrity and proper use, including disposal of data under the Data Protection Act 2018, which is particularly challenging given the volume of information handled by the authority on a daily basis. The Council has regulatory obligations into the management of SAR/FOI/EIR requests<br>United Kingdom General Data Protection Regulations (UK GDPR) came into effect that have introduced significantly increased obligations on all data controllers, including the Council.<br>Officers working remotely and increasing information security threats.<br>There is insufficient resource available to undertake comprehensive oversight / assurance activity that provides assurance on | Information Commissioner's Office sanction (e.g., undertaking, assessment, improvement, enforcement or monetary penalty notice issued against the Authority).<br>Serious breaches under UK GDPR could attract a fine. Increased risk of litigation. Reputational damage. Bias presenting in AI algorithms impacting outcomes and decision making<br>Loss of trust in automated decisions | Medium               |                       | • Service to complete data mapping process for their respective areas  | Information A  | -Accepted        | 31/08/2025  | Medium          |
|  |  | 15                   |                       |  | Asset Owners   |                  |             | 9               |
|  |  | Significant (3)      |                       | • Supply chain risk management program including keeping an inventory of all ICT suppliers and third party data transfers, cyber requirements built into procurement, regular assurance of supplier security to ISO 27001 and Cyber Essentials, and regular risk assessments carried out to identify supply chain risks. | James Church   | Control          |             | Significant (3) |
|  |  | Very Likely (5)      |                       | • Data breach process enhanced by automated system, changes included auto reminders to services where further information is required. More data is available on service performance in relation to breach management and also allow for timely escalation where appropriate   | Peter Healey   | Control          |             | Possible (3)    |
|  |  |                      |                       | • Senior Information Risk Owner for the Council appointed with training and support to undertake the role.   | David Whittle  | Control          |             |                 |
|  |  |                      |                       | • Caldicott Guardian appointed with training and support to undertake the role   | Richard Smith  | Control          |             |                 |
|  |  |                      |                       | • Overarching policy for use of Artificial Intelligence is in place and has been communicated to the wider organisation  | Benjamin Watts | Control          |             |                 |

## Risk Register - Corporate Risk Register

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| <p>compliance with existing information governance standards.</p> <p>There is a critical dependency on the Council's Local Authority Trading Companies (CBS) and other material third parties to support Information Governance compliance for the KCC systems and network.</p> <p>KCC services' requirement for non-standard systems creates vulnerabilities.</p> <p>Failure to manage data lawfully when using automated decision making via algorithms.</p> |  |  | <ul style="list-style-type: none"> <li>Staff are required to complete mandatory training on Information Governance and Data Protection and refresh their knowledge every two years as a minimum.</li> </ul>  | Benjamin Watts | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>IG policies and procedures have been consolidated. Communications campaign about to commence authority wide. Policies reviewed regularly. Data Protection Officer in place to act as a designated contact with the ICO.</li> </ul>                                    | Benjamin Watts | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>Management Guide/operating modules on Information Governance in place, highlighting key policies and procedures.</li> </ul>   | Benjamin Watts | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>Corporate Information Governance Group established, chaired by the DPO and including the SIRO and Caldecott Guardian acting as a point of escalation for information governance issues and further escalation to the Corporate Management Team if required</li> </ul> | Benjamin Watts | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>Privacy notices as well as procedures/protocols for investigating and reporting data breaches reviewed and updated</li> </ul>   | Caroline Dodge | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>Information Resilience and Transparency team in place, providing business information governance support.</li> </ul>  | Caroline Dodge | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>The data capture mapping capture form is in place. Policy guidance requires Information Governance leads to review data maps with the services on a bi annual basis, or as and when a new DPIA is created reflected on the data map.</li> </ul>                       | Hannah Rumball | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>Data Protection Impact Assessment (DPIA) is supported with a matrix detailing the type of data and its usage. KCC testing of Microsoft Copilot is moving into its second phase, and the DPIA remains a live document and will be updated accordingly.</li> </ul>      | Hannah Rumball | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>Cross Directorate Information Governance Working Group in place.</li> </ul>   | Hannah Rumball | Control |  |  |

Risk Register - Corporate Risk Register

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|  |  |  | <ul style="list-style-type: none"><li>• ICT Commissioning function has necessary working/contractual relationship with the Cantium Business Solutions to require support on KCC ICT compliance and audit.</li></ul> | Sverre Sverreson | Control |  |  |
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# Risk Register - Corporate Risk Register

| Risk Ref   | CRR0063  | Risk Title and Event |                       |   |               | Assigned To      | Last Review da | Next Review  |
|--|--|----------------------|-----------------------|---|---------------|------------------|----------------|--------------|
| Capacity to accommodate and care for Unaccompanied Asylum-Seeking (UAS) Children   |  |                      |                       |   |               | Sarah Hammond    | 18/06/2025     | 18/09/2025   |
| In the event of a significant increase of UAS children arriving in Kent there may be insufficient resource to provide suitable social work assessment capacity, placements and support for UAS children in a timely fashion.   |  |                      |                       |   |               |                  |                |              |
| Cause  | Consequence  | Current Risk         | Previous Current Risk | Control / Action  |               | Control / Action | Target Date    | Target Risk  |
| In recent years, large numbers of unaccompanied children have arrived in the UK and claimed asylum. Because almost all of these children enter the UK in Kent, KCC is the local authority responsible for accommodating and looking after them in the first instance, in addition to those who already live in its area.<br><br>In July 2023 the High Court ruled that KCC must accommodate and look after all UAS children arriving into the County, pending transfer to other local authorities under the National Transfer Scheme. This has resulted in KCC being required to expand their social work and reception centre services to meet this ruling as it presents numerous pressures on an already stretched service, and for the council as a whole. | Impacts on vulnerable children (both UAS children and potential knock-on impacts for Kent looked after children).<br>Risks KCC being unable to fulfil its statutory responsibilities to all children effectively.<br>Significant additional budget pressures on the Authority, impacting on its financial resilience. However, this impact is reducing as funding has been secured from the Home Office and DfE (revenue and capital). | Medium               |                       | • The Council has utilised / re purposed available buildings to increase accommodation capacity.  | Rebecca Spore | Control          |                | Medium       |
|  |  | 12                   |                       | • UAS Steering Group in place to coordinate support efforts across the organisation. The steering group brings together key representatives across the organisation including social work, finance, analytics, HR and infrastructure.   | Sarah Hammond | Control          |                | 12           |
|  |  | Serious (4)          |                       |   |               |                  |                |              |
|  |  | Possible (3)         |                       |   |               |                  |                | Possible (3) |
|  | Legal consequences.<br><br>Reputational damage.  |                      |                       | • Intensive negotiations with Home Office and Department for Education following the receipt of funding up to March 2025. Negotiations were focused on the significant changes needed to the NTS as future modelling showed there would be a gap in the future without these. | Sarah Hammond | Control          |                |              |

## Risk Register - Corporate Risk Register

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|  |  |  | <ul style="list-style-type: none"> <li>Additional support has been secured from the Home Office and Department for Education in the form of additional funding (capital and revenue) to ensure the cost to accommodate and look after all UAS children arriving to Kent is fully funded by central government. Central government revenue funding is informed by KCC's estimated costs, with a proportion based on fixed costs to protect KCC from fluctuations in demand across a given year. There is close ongoing communication with the Home Office and DfE.</li> </ul> | Sarah Hammond | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>Transport arrangements have been put into place to ensure children and young people can be efficiently transported from the Kent Intake Building to their KCC placement ahead of the final destination under the National Transfer Scheme, which the Home Office is responsible for providing the transportation to.</li> </ul>   | Alex Stringer | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>UAS child numbers are continually monitored and reviewed to assess capacity and aid planning. An emergency response plan is in place between KCC, Home Office and Department for Education (DfE) which includes an early warning system that notifies the Home Office and DfE when capacity fills up.</li> </ul>  | Alex Stringer | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>Best endeavours are being applied to ensure assessments are completed for every child that arrives in port and find appropriate placements, despite resourcing challenges.</li> </ul>   | Alex Stringer | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>Recruitment of required social care staff to ensure there is sufficient staffing in place in terms of operational delivery. A proportion of posts will be permanent and a proportion will be filled by agency staff to enable flexibility and adaptability in line with demand.</li> </ul>  | Alex Stringer | Control |  |  |

Risk Register - Corporate Risk Register

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|  |  |  | <ul style="list-style-type: none"><li>• Registering of reception centres with Ofsted to meet regulations.</li><li>• Recruitment of required reception centre staff to ensure there is sufficient staffing in place ahead of new reception centres opening. The recruitment and start dates for new staff is being planned to enable to robust induction ahead of the centre formally opening. A proportion of posts will be permanent and a proportion will be filled by agency staff to enable flexibility and adaptability in line with demand.</li><li>• Fostering placements (in-house and independent) have been block commissioned to ensure placements for UAS children who are under 16.</li></ul> | Alex Stringer<br>Alex Stringer<br><br>Alex Stringer | Control<br>Control<br><br>Control |  |  |
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# Risk Register - Corporate Risk Register

| Risk Ref  | CRR0067   | Risk Title and Event |                       |  | Assigned To   | Last Review da   | Next Review |              |
|---|---|----------------------|-----------------------|--|---------------|------------------|-------------|--------------|
| SEND Delivery Improvement   |   |                      |                       |  | Sarah Hammond | 18/06/2025       | 18/09/2025  |              |
| Insufficient improvement in areas identified within Ofsted timescales and children with SEND do not meet sufficient progress within the available financial resource.<br>Insufficient resources and focus on the new inspection framework.<br>Failure to maintain effective and continued delivery progress against the APP.  |   |                      |                       |  |               |                  |             |              |
| Cause   | Consequence   | Current Risk         | Previous Current Risk | Control / Action   |               | Control / Action | Target Date | Target Risk  |
| The Kent local area inspection by Ofsted and the CQC for children with SEND took place in January 2019. This inspection found nine significant areas of weakness across the local area which resulted in a Written Statement of Action being issued. In September 2022, the Local Area was revisited by Inspectors from both Ofsted and the CQC, who found that the area had not made sufficient progress in addressing the weaknesses as set out in their letter dated 9 November 2022. An Improvement Notice was subsequently issued 31 March 2023. Concurrent to this event KCC was also in discussion with the DfE regarding participating in a financial recovery programme, known as Safety Valve, as a potential approach to addressing the growing actual and projected overspend in the High Needs | In the event the Kent local area fails to continue to adequately mitigate weaknesses identified in its special educational needs and disability (SEND) provision there would be:<br>Serious Service Risk: Adverse impact on outcomes for vulnerable children and young people.<br>Serious Compliance Risk: Should the Secretary of State not be satisfied with the Council’s progress at any stage, they may choose to invoke statutory powers of intervention (s497A Education Act 1996) to direct the Council to take any further actions deemed necessary to secure the improvements required in SEND services.<br>Potential for legal action if statutory time limits or processes are not met.<br>Significant Reputation Risk: Dissatisfaction from families and potential for adverse press at a national and local level for a prolonged period. | Medium               |                       | • Delivery of SEND Improvement Programme, which includes delivery of requirements detailed in the Kent Accelerated Progress Plan.  | Sarah Hammond | A -Accepted      | 30/12/2025  | Medium       |
|   |   | 12                   |                       |  |               |                  |             | 8            |
|   |   | Serious (4)          |                       | • The Council has produced for approval by the Department for Education (DfE) and NHS England (NHSE) an Improvement Plan (Accelerated Progress Plan) to deliver appropriate and sustainable improvement, covering the areas identified in the Ofsted and CQC revisit report of 9 November 2022, as well as recommendations made by the Department.   | Sarah Hammond | Control          |             | Serious (4)  |
|   |   | Possible (3)         |                       | • Continual lobbying of Government on two matters; increased funding in both the short and medium term, and structural changes to government policy to help reduce the demand i.e. via County Council Network, Association of Directors of Children’s Services. Includes provision of evidence of the impact of the High Needs pressures on the quality of education children receive, schools, other providers and the Local Authority. Ongoing lobbying of Government to pause the existing SEND inspection framework. | Sarah Hammond | Control          |             | Unlikely (2) |
|   |   |                      |                       | • Local area SEND Strategy developed in collaboration with partners, which goes beyond the Written Statement of Action to enable sustained improvement and transform Kent’s SEND offer.  | Sarah Hammond | Control          |             |              |

## Risk Register - Corporate Risk Register

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| <p>Funding Block.</p> <p>To address the identified weaknesses an Improvement Plan (Accelerated Progress Plan - APP) was formalised by the Local Area September 2023 against which Outcome and Impact based KPIs are being scrutinised and addressed.</p> <p>Progress against APP actions has been made and the Improvement Notice was lifted August 2024 on the understanding that the provision of SEND services remains a priority. Progress continues on outstanding APP actions which are subject to regular review and DfE oversight.</p> <p>The Government have indicated that they are not going to pause or suspend the new inspection framework for SEND. This risk for Kent is that the focus remains on the previous nine areas of weakness which are at odds with the new inspection framework. This could result in insufficient resource being directed to addressing the key issues in the new framework.</p> |  |  |  | <ul style="list-style-type: none"> <li>• Robust programme management in place, ensuring appropriate alignment between project workstreams and overall programme delivery arrangements. Sarah Hammond</li> <li>• KCC SEND Transformation Strategic Board in place, with responsibility for coordinating activity and tracking improvement progress, reporting into the partnership Strategic Improvement and Assurance Board. Sarah Hammond</li> <li>• Kent and Medway Children and Young People's Programme Board joint governance mechanism with Health partners (sub-group of Integrated Care Board) Sarah Hammond</li> <li>• Independently chaired Strategic Improvement and Assurance Board (now Kent SEND Partnership Board) established, including representation from the Local Authority (including Members and cross directorate colleagues), Health, Learning and Teaching settings, representatives of parents and carers, and where appropriate young people. Sarah Hammond</li> </ul> | <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> |  |  |
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## Risk Register - Corporate Risk Register

| Risk Ref  | CRR0049  | Risk Title and Event |                       |  | Assigned To | Last Review da   | Next Review |             |
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| Fraud and Error   |  |                      |                       |  | John Betts  | 09/04/2025       | 30/09/2025  |             |
| <p>Failure to prevent or detect significant acts of fraud or error from internal or external sources, in that within any process or activity there are risks that:</p> <ul style="list-style-type: none"><li>- false representations made to make a gain or expose another to a loss</li><li>- failure to notify a change of circumstances to make a gain or expose another to a loss</li><li>- abuses of position, in which they are expected to safeguard to make a gain or expose another to a loss.</li></ul> <p>Given the size and complexity of KCC, with a significant number of payments going to a wide range of suppliers and other public bodies, whom have a legitimate need to amend their bank details, that this process is used to submit a fraudulent change of bank details (mandate fraud) to KCC in order to divert funds.</p> <p>Compromise of physical security controls and/or infrastructure including unauthorised access to ICT systems could lead to fraudulent access and/or use of data.</p> |  |                      |                       |  |             |                  |             |             |
| Cause   | Consequence  | Current Risk         | Previous Current Risk | Control / Action   |             | Control / Action | Target Date | Target Risk |
| <p>As with any organisation, there is an inherent risk of fraud and/or error that must be acknowledged and proactively managed.</p> <p>The fraud threat posed during emergency situations is higher than at other times, and all public bodies should be attuned to the risks facing their organisations and the public sector. This is further impacted by inflation and the cost-of-living crisis. It is critical that management implements a sound system of internal control and always demonstrates commitment to it, and that investment in fraud prevention and detection technology and resource is sufficient. This includes ensuring that new emerging</p>   | Financial loss leading to pressures on budgets that may impact the provision of services to service users and residents.   | Medium               |                       | • KCC is part of the Kent Intelligence Network (KIN), a joint project between 12 district councils, Medway Council, Kent Fire & Rescue and Kent County Council which analyses and data matches financial and personal information to allow fraudulent activity in locally administered services to be detected more proactively within Kent  |             | Control          |             | Low         |
|   | Reputational damage, particularly if the public see others gaining services or money that are not entitled to, leading to resentment by the public against others. | 10                   |                       | • An agreed Memorandum of Understanding is in effect with partners (District Councils, Police and Fire Service) outlining the minimum standards expected to be applied by collection authorities (District Councils) to address fraud and error relating to council tax and business rates. Additional work jointly funded to identify and investigate high risk cases based on each authority's share of the tax base. This supports the work of the KIN. |             | Dave Shipton     | Control     |             |
|   | Potential legal challenge.   | Moderate (2)         |                       | • Multiple layers of logical, physical and administrative security controls.   |             | James Church     | Control     |             |
|   | Reputational damage.   | Very Likely (5)      |                       | Linked to CRR0014 Cyber Security Corporate Risk.   |             |                  |             |             |
|   | Poor service delivery.   |                      |                       |  |             |                  |             |             |
| Potentially enabling Serious Organised Crime.   |  |                      |                       |  |             |                  |             |             |

## Risk Register - Corporate Risk Register

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| <p>fraud/error issues are sufficiently risk assessed.</p> <p>As part of the Economic Crime and Corporate Transparency Act (ECCT), a new corporate criminal offence of 'Failure to Prevent Fraud' has been introduced. The offence is intended to hold large organisations to account if they profit from fraud. Under the offence, large organisations may be held criminally liable where an employee, agent, subsidiary, or other "associated person", commits a fraud intending to benefit the organisation.</p> |  |  |  | <ul style="list-style-type: none"> <li>• KCC reserves the right to carry out a dip sample of due diligence vetting checks in partnership with contract managers to verify declarations of non-involvement. Clare Maynard</li> <li>• Scheme of Delegation - compliance with Delegation Matrix and Spending the Council's Money Clare Maynard</li> <li>• Procurement standards reviewed, including rules relating to "Spending the Council's Money", which have been clarified, to ensure relevant controls are in place to mitigate e.g. declarations of interest for procurement fraud, authorisation levels etc. Clare Maynard</li> <li>• All tendering specification now include a requirement for the tenderer to provide details on what procedures they have in place to prevent fraud from occurring within the contract, both in the service delivery and invoicing into KCC. Support in evaluating these procedures will be obtained from the Counter Fraud Team as part of the overall evaluation process. Clare Maynard</li> <li>• Clear process within relevant Commissioning Departments for procurement under the PCR threshold Clare Maynard</li> <li>• With supplier consent, within the Tender Selection Questionnaire and subsequent contract Terms and Conditions. Clare Maynard</li> <li>• Communication of mandate fraud / cyber security to KCC supply chain. Clare Maynard</li> <li>• Internal Audit includes proactive fraud work in its annual audit plan, identifying potential areas where frauds could take place and checking for fraudulent activity. Jonathan Idle</li> <li>• Mandatory training - Data Protection and Information Governance training is mandatory and requires staff to refresh periodically. Benjamin Watts</li> </ul> <p>Linked to CRR0014 Cyber Security Corporate Risk.</p> | <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> |  |  |
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## Risk Register - Corporate Risk Register

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|  |  |  | <ul style="list-style-type: none"> <li>• Communication, including messaging to encourage increased awareness of information security amongst staff.</li> </ul> <p>Linked to CRR0014 Cyber Security Corporate Risk.</p>           | Diane Christie            | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Whistleblowing Policy in place for the reporting of suspicions of fraud or financial irregularity</li> </ul>  | James Flannery            | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Training and awareness raising is conducted periodically and is included in the Counter-Fraud action plan.</li> </ul>   | James Flannery            | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Preventing Bribery Policy in place, presenting a clear and precise framework to understand and implement the arrangements required to comply with the Bribery Act 2010.</li> </ul>      | James Flannery            | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Anti-fraud and corruption strategy in place and reviewed annually</li> </ul>  | James Flannery            | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Counter Fraud Action plan in place to manage resources in conducting reactive and proactive work across KCC.</li> </ul>   | James Flannery            | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Participate in the National Fraud Initiative exercise every two years to identify any fraud and error within key risk areas.</li> </ul>   | James Flannery            | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• KCC Counter Fraud &amp; Trading Standards are a member of the Kent Fraud Panel to help inform current fraud trends and emerging risks that may impact KCC and its residents.</li> </ul> | James Flannery            | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Mandate fraud risks are communicated as part of the fraud awareness sessions.</li> </ul>  | James Flannery            | Control |  |  |
|  |  |  | <ul style="list-style-type: none"> <li>• Systems of internal control which aim to prevent fraud and increase the likelihood of detection e.g. financial controls such as authorisation of payments and spend.</li> </ul>         | Corporate Management Team | Control |  |  |

Risk Register - Corporate Risk Register

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|  |  |  | <ul style="list-style-type: none"><li>The Corporate Management Team is required to engage the Counter Fraud Team regarding all new policies, initiatives and strategies as per the anti-fraud and corruption strategy, and have relevant fraud risk assessments and mitigating controls in place on specific fraud risks associated with their areas.</li></ul> | Corporate Management Team | Control |  |  |
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# Risk Register - Corporate Risk Register

| Risk Ref  | CRR0065  | Risk Title and Event |                       |  |             | Assigned To      | Last Review da | Next Review       |
|---|--|----------------------|-----------------------|--|-------------|------------------|----------------|-------------------|
| Implementation of fit-for-purpose Oracle Cloud system.  |  |                      |                       |  |             | Simon Jones      | 26/03/2025     | 26/06/2025        |
| Oracle Cloud system not fit-for-purpose.  |  |                      |                       |  |             |                  |                |                   |
| Cause   | Consequence  | Current Risk         | Previous Current Risk | Control / Action   |             | Control / Action | Target Date    | Target Risk       |
| This is a critical programme for the organisation, replacing the current outdated infrastructure. It is a large and complex programme, which carries with it significant inherent risk. There have been reports in the public domain about other implementations that have been fraught with difficulties, so it is important that this organisation-wide risk features on the Corporate Risk Register for visibility and that the programme demonstrates robust governance, change and programme management, especially at a time where organisational capacity is stretched, with several major change activities in train. | 1. Most impact on finance - unable to carry out month/year end, paying suppliers/providers/clients and staff and receive payments in to the Authority.<br>2. Services unable to carry out operational duties.<br>3.Costs to the Oracle Cloud programme will increase as resources to the programme extended.<br>4. Reputational impact to the Authority.<br>5.Increased costs will impact the MTFP and Securing Kent's Future. | Medium               |                       | • Right skills in place to carry out User Acceptance Testing (UAT).  | Ramzan Amin | Control          |                | Low               |
|   |  | 10                   |                       | • UAT phases - control points for sign off.  | Ramzan Amin | Control          |                | 5                 |
|   |  | Major (5)            |                       | • Programme Team to provide Internal communications with regular updates and key messages so that information is given in a timely matter.   | Ramzan Amin | Control          |                | Major (5)         |
|   |  | Unlikely (2)         |                       | • Build & Functional Test phases for each module built in to the programme with sign off required at end of each 'build' phase.  | Ramzan Amin | Control          |                | Very Unlikely (1) |
|   |  |                      |                       | • Pre UAT & Training schedule as part of the programme.  | Ramzan Amin | Control          |                |                   |
|   |  |                      |                       | Owner of control sits with the Service Implementation partner who sit outside of KCC.  |             |                  |                |                   |
|   |  |                      |                       | • Transition / change management planning to be completed.   | Ramzan Amin | Control          |                |                   |
|   |  |                      |                       | • Agree date of 'change freeze' across all applications that interface with Oracle   | Simon Jones | Control          |                |                   |
|   |  |                      |                       | • Cloud readiness assessment (with Service Leads) phase undertaken to map out current processes and how these will fit to the new system taking on board 'ADOPT not ADAPT'   | Simon Jones | Control          |                |                   |
|   |  |                      |                       | • Oracle Cloud Board Members to ask their respective areas to ensure that the programme is aware of any proposed changes to the current Oracle System or associated 3rd party systems to enable the programme to impact assess as otherwise it could result in additional costs. | Simon Jones | Control          |                |                   |