

Appendix 1 - Chief Executive's Department and Deputy Chief Executive's Department Led Corporate Risks - Policy and Resources Cabinet Committee



Risk Register - Corporate Risk Register

Current Risk Level Summary

Green	0	Amber	3	Red	6	Total	9
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Current Risk Level Changes

0	1	1	0	2
0	0	0	2	2
0	0	0	0	0
0	0	0	0	1
0	0	0	0	0

Risk Ref	Risk Title and Event	Assigned To	Last Review da	Next Review				
CRR0053	Asset Management and Degradation and associated impacts, linked to Capital Programme affordability	Cath Head	10/02/2026	10/05/2026				
	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		<ul style="list-style-type: none"> Papers to Secretary of State seeking approval to increase school financial thresholds 10-year capital programme published. This identifies 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. Lobbying of Government in relation to capital funding. 	Joanne Taylor	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)			Cath Head	Control		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.				Cath Head	Control		
The uncertainty includes	Non-priority sites may not be maintained to a sufficient standard and may not be safe and fit for purpose, leading to building closures.							
	Delays result in additional							

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<p>capital expenditure funded by grants, many of which are crucial to delivery of statutory services.</p> <p>There are a number of geo-political uncertainties in the current environment which additionally impact on the financial and operating environment.</p> <p>Inflationary pressures impact on the capital programme significantly.</p> <p>Expectations of key stakeholders on capital spend.</p> <p>Risks associated with changes in legislation related to developer contributions. This could lead to a requirement for significant forward funding.</p>	<p>inflationary costs.</p> <p>Funding annual rolling programmes from borrowing is unsustainable.</p> <p>Reputational damage as a result of building closures or any impact on service delivery.</p> <p>The continued use of capital receipts flexibility for permitted revenue spending will impact on receipts available to fund capital projects.</p>			<ul style="list-style-type: none"> • The capital programme 2026-36 includes no Cath Head new borrowing above borrowing in the previous programme. New projects in the programme have been funded through removal of schemes that will no longer be progressed, alternative funding through grants, changes to plans for Strategic Headquarters and reprofiling spending for existing schemes. These measures are aimed at reducing financing costs from revenue. • The 2026-36 capital programme includes additional provision for priority highway schemes. Cath Head Control • Asset safety factors associated with our assets are given priority during the budget setting process. Cath Head Control • An annual programme of planned preventative maintenance is undertaken at KCC sites by the relevant Facilities Management contract partners Tony Carty Control • Lobbying central Government re capital grants relating to Highways. Simon Jones Control • Premises Officers in place to visit schools and support them with forecasting maintenance budgets. Joanne Taylor Control • The most urgent works will be completed on the agreed, prioritised sites. Joanne Taylor Control • Infrastructure works with Assistant Education Directors to communicate to schools regarding their obligations for maintenance and their responsibilities for repairs under financial thresholds Joanne Taylor Control • External funding bid for 'schools rebuilding programme' (DfE) was submitted, and successful for Birchington Primary School. Joanne Taylor Control • Health and Safety Team in place in advisory capacity to ensure compliance with Government and HSE guidelines. Jonty Tindall Control • Review of KCC estate – Future Assets Programme. Rebecca Spore Control 			
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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.	Dave Shipton	10/02/2026	10/05/2026			
		Risk of significant adverse variance to the level of savings and income agreed in KCC's budget.						
		Spending growth pressures significantly exceed forecasts.						
Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk	
<p>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.</p> <p>The most significant savings requirements are in adult social care.</p> <p>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.</p>	<p>Council reserves further depleted below a sustainable position.</p> <p>Impact on service delivery, as urgent additional savings are required to be found.</p> <p>More imminent danger of financial failure – ultimately requesting Exceptional Financial Support from Government or issuing of section114 notice by Corporate Director Finance (s151 Officer).</p> <p>Negative impact on MTFP.</p>	<p>High</p> <p>25</p> <p>Major (5)</p> <p>Very Likely (5)</p>		<ul style="list-style-type: none"> Adult Social Care have a more rigorous approach to managing placements including a review of previously self-funded arrangements and ongoing focus on assessments of eligible needs through only meeting statutory local authority duties. Finance and performance monitoring progress reports considered at Cabinet meetings. Budget monitoring includes 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. Savings delivery plans and monitoring processes in place. 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. The Council's Financial Regulations (and delegation levels within), "Spending the Council's Money" and Code of Corporate Governance reviewed, to ensure they remain fit for purpose in the current environment. Data is collected and analysed to benchmark against other local authorities. 	<p>Sarah Hammond</p> <p>Cath Head</p> <p>Cath Head</p> <p>Cath Head</p> <p>Cath Head</p> <p>Cath Head</p> <p>Dave Shipton</p>	<p>A -Accepted</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p>	<p>31/05/2026</p>	<p>Medium</p> <p>9</p> <p>Significant (3)</p> <p>Possible (3)</p>

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			<ul style="list-style-type: none"> An alternative strategy has been developed for ASCH savings. Previously, growth forecasts for demand and cost of new client placements was based on assuming historical trends continue and savings were aimed at reducing demand. Under the new strategy there is a greater emphasis on demand and cost management with demand forecasts based on population forecasts and cost of new placements based upon an affordable levels with targets for average cost of new placements set below cost of recent current placements. Performance will be monitored against these new targets – milestones, risks, dependencies etc, and reported to Strategic Reset Programme Board. 	Dave Shipton	Control		
			<ul style="list-style-type: none"> Adult Social Care budget includes provision for Sustainability Fund to support the discharge of the Council's market shaping and sustainability duties under the Care Act 2014 through targeted, proportionate and time-limited interventions. 	Sarah Hammond	Control		
			<ul style="list-style-type: none"> Adult Social Care have reviewed the arrangements for annual fee uplifts for existing placements based on a differential approach for different settings. This approach includes market analysis and provider engagement considering the impacts of inflation and other cost pressures on providers, the sustainability of the market and the sustained investment in recent years that has resulted in higher fees compared to other councils. 	Sarah Hammond	Control		
			<ul style="list-style-type: none"> Analytics function used to undertake detailed analysis of the main areas of overspend. 	Matthew Wagner	Control		
			<ul style="list-style-type: none"> Regular Strategic Reset Programme (SRP) engagement with Directors following approval of delivery plans. 	Elizabeth Sanderson	Control		

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			<ul style="list-style-type: none"> • Equality Impact Assessment screening will be completed for any alternative and / or additional savings necessary under the recovery plan. • Any adverse variations to agreed savings / income are swiftly identified with compensating actions agreed with management. • Resource Accountability Statements signed off by Corporate Directors. 	Corporate Management Team	Control		
				Corporate Management Team	Control		
				Corporate Management Team	Control		

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Risk Ref	CRR0014	Risk Title and Event	Assigned To	Last Review da	Next Review			
		Cyber & Information Security Resilience	Lisa Gannon	13/01/2026	13/04/2026			
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 20 Major (5)		<ul style="list-style-type: none"> Review 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	31/03/2026	High 20 Major (5)
Supply chain compromise including third party data transfers, vulnerabilities in purchased equipment and supplier system breaches.	Damages claims. Reputational Damage. Potential significant impact on business interruption if systems require shutdown until magnitude of issue is investigated.	Likely (4)		<ul style="list-style-type: none"> Cyber security to be added to the mandatory IG training as agreed with GLD. 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 Plus, and regular risk assessments carried out to identify supply chain risks. 	James Church	A -Accepted	30/04/2026	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. Loss of key systems potentially impacting ability to deliver statutory services. Partners unable to discharge their duties Complaints			<ul style="list-style-type: none"> CBS risks, including cyber risks shared with KCC on a regular basis. 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		
Compromise of physical security controls and/or infrastructure including unauthorised access to data centres, network cables and natural disaster (flood, fires etc.)				<ul style="list-style-type: none"> 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.				<ul style="list-style-type: none"> 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		

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			<ul style="list-style-type: none"> Multiple layers of logical, physical and administrative security controls 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. 	James Church	Control		
			<ul style="list-style-type: none"> Cyber standards and risk assessment have been included into the central ICT commissioning framework 	James Church	Control		
			<ul style="list-style-type: none"> Internal assurance programme including audits, risk assessment and vulnerability management 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. Risk assessments completed on new implementations to ensure that cyber risks are highlighted and treated. Vulnerability management activities to identify and treat vulnerabilities in good time. 	James Church	Control		
			<ul style="list-style-type: none"> Investment in and implementation of new controls and technologies including capabilities of Microsoft M365 E5 licenses. 	James Church	Control		
			<ul style="list-style-type: none"> Data Protection and Information Governance training is mandatory and requires staff to refresh periodically. Progress rates monitored regularly. 	Benjamin Watts	Control		
			<ul style="list-style-type: none"> Messages warning staff of cyber threats are sent out regularly. 	Diane Christie	Control		
			<ul style="list-style-type: none"> Messages to encourage increased awareness of information security amongst staff are communicated to align with key implementation milestones of the ICT Transformation Programme. 	Diane Christie	Control		

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Risk Ref	CRR0009	Risk Title and Event	Assigned To	Last Review da	Next Review
		Future financial and operating environment for Local Government	Dave Shipton	10/02/2026	10/05/2026
<p>Levels of revenue spending and growth pressures across services continue to exceed the Council's core spending power, threatening the financial sustainability of KCC, its partners and service providers.</p> <p>In order to set a balanced budget, the council is likely to have to continue to make significant year on year savings and/or generate additional income and take all reasonable steps locally to manage financial pressures .</p> <p>Quality of KCC commissioned / delivered services suffers as financial situation continues to worsen.</p> <p>Should the Council be unable to address financial pressures and set a balanced budget, the Council would have to seek Exceptional Financial Support.</p>					

Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk	
<p>Despite re-introducing a multi-year settlement covering 2026-29, the overall amount of funding from central government and local taxation continues to be less than spending pressures.</p> <p>2026-27 budget and the medium term to 2028-29 are likely to continue to be exceptionally challenging and will require further spending reductions and/or income generation and ultimately difficult decisions over Council Tax rates. Even though overall net cash is increasing, this is not sufficient to keep pace with forecast spending demands.</p> <p>There is also no certainty that additional central government funding to address spending pressures in social care will</p>	<p>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.</p>	<p>High</p> <p>20</p> <p>Major (5)</p> <p>Likely (4)</p>		<ul style="list-style-type: none"> Adult Social Care have set out plans for the retendering of framework contracts with more robust guide prices and expectations for higher take-up of framework placements for new clients. KCC Strategic Reset Programme established and reprioritised to focus on key budget delivery programmes. Financial analysis conducted after each Chancellor of the Exchequer Budget Statement to review potential implications for future local government settlements. Processes in place for monitoring delivery of savings and challenging targets to bear down on future cost growth, as well as the budget as a whole. Ensure evidence of any additional KCC spend required to cover impacts relating to new burdens imposed. 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. Greater consideration of affordability within growth forecasts. 	<p>Sarah Hammond</p> <p>Amanda Beer</p> <p>Dave Shipton</p> <p>Dave Shipton</p> <p>Dave Shipton</p> <p>Dave Shipton</p>	<p>A -Accepted</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p>	<p>31/05/2026</p>	<p>High</p> <p>16</p> <p>Serious (4)</p> <p>Likely (4)</p>
	<p>Failure to deliver statutory obligations and duties or achieve social value.</p>							
	<p>Potential for partner or provider failure – including sufficiency gaps in provision.</p>							
	<p>Reduction in resident satisfaction and reputational damage.</p>							
	<p>Reserves are reduced to below an adequate level.</p>							

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<p>be clearly identified in future settlements, adding additional demands on core funding.</p> <p>The level of savings required in 2026-27 and over the medium term continues to be challenging, driven largely by growth in spending rather than cuts in funding.</p> <p>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>Local Government Reorganisation proposals have been submitted, although structural changes on their own will not address the underlying causes of spending growth pressures.</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>		<ul style="list-style-type: none"> • Budget managers will be given clearer expectations regarding both affordable activity levels and cost/fee levels within budget assumptions. • Robust budgeting and financial planning in place via Medium Term Financial Planning (MTFP) process, including stakeholder consultation. • Ongoing enhancements to Section 25 Assurance Statement including review and updates to assessment criteria and key risks. • Developed better scrutiny of spending bids and savings plans, to improve the overall robustness of the budget setting process, thereby improving financial resilience. • Regular review of HM Treasury forecasts and Government planned spending levels for Local Government. • 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. • KCC Quarterly Performance Report monitors key performance and activity information for KCC commissioned or delivered services. Regularly reported to Cabinet. • Ongoing monitoring and modelling of changes in supply and demand in order to inform strategies and service planning in key areas going forward. • Regular monitoring and oversight of progress against KCC's 'Safety Valve' agreement with the Department for Education (DfE). • 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. 	<p>Dave Shipton</p> <p>Dave Shipton</p> <p>Dave Shipton</p> <p>Dave Shipton</p> <p>Dave Shipton</p> <p>David Whittle</p> <p>Matthew Wagner</p> <p>Matthew Wagner</p> <p>Christine McInnes</p> <p>Corporate Directors CD</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> <p>Control</p>		
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			<ul style="list-style-type: none">Assessing impact and responding to Government plans with the potential for significant financial implications for the Council, including adult and children's social care, changes to waste collection arrangements etc.	Corporate Directors CD	Control		
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Risk Ref	CRR0058	Risk Title and Event	Assigned To	Last Review da	Next Review			
		Capacity and capability of the workforce	Amanda Beer	16/12/2025	16/03/2026			
<p>Workforce capacity challenges - insufficient staff to meet service demands.</p> <p>Capacity pressures within the management, and leadership teams potentially impacting time for reflection and decision making.</p> <p>Impact on budgets from use of agency staff/contractors to fill roles to support service delivery.</p> <p>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.</p> <p>Complaints from Kent residents</p> <p>Lack of depth / resilience of key personnel or teams.</p>								
Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk	
<p>KCC is experiencing increasing demand for services due to whole system pressures which placing pressure on the existing capacity of the workforce.</p> <p>As a result of the complexity and volatility of issues being faced in the organisation capacity in within the management, and leadership teams is stretched.</p> <p>Increasing complexity of issues being faced by KCC require capable and experienced officers with potentially different skill sets.</p> <p>The financial position of the Council limits the ability to manage in spikes operational demand by way of</p>	<p>Adverse impact on productivity</p> <p>Negative impact on performance and / or delivery of statutory functions or services.</p> <p>Lack of experienced staff with specialist skills</p> <p>Reliance on interim and agency staff potentially impacting stability of teams and consistency of service.</p> <p>Inability to progress service development.</p> <p>Low staff morale and negative impact on wellbeing, potentially leading to burn out.</p> <p>Loss of discretionary effort/goodwill.</p>	<p>High</p> <p>16</p> <p>Serious (4)</p> <p>Likely (4)</p>		<ul style="list-style-type: none"> Post implementation review of pay strategy to ensure it remains competitive and sustainable for the future. Review spans and layers of management in order to make sure we have the right people in the right places doing the right things. Promote learning opportunities including the coaching network, webinars and networking opportunities. 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. Review our good conversation tool to look in more depth about the way career development conversation can be supported. Implementation of action plans arising from latest staff survey. 	<p>Kerena Hunter</p> <p>Kerena Hunter</p> <p>Diane Christie</p> <p>Diane Christie</p> <p>Kirsty Ireland</p> <p>Corporate Management Team</p>	<p>A -Accepted</p> <p>A -Accepted</p> <p>A -Accepted</p> <p>A -Accepted</p> <p>A -Accepted</p> <p>A -Accepted</p>	<p>30/04/2026</p> <p>30/04/2026</p> <p>30/04/2026</p> <p>30/04/2026</p> <p>30/04/2026</p> <p>27/03/2026</p>	<p>Medium</p> <p>12</p> <p>Serious (4)</p> <p>Possible (3)</p>

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<p>recruitment.</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>Tightened spending controls have been introduced to respond to the council's financial situation, including restrictions on recruitment.</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"> • Workforce planning and appropriate career development and succession planning mechanisms in place. • Delivery of the People Strategy for 2022-2027 approved by Personnel Committee • 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. • KCC's Organisation Design principles set out and periodically refreshed and monitored to ensure they remain fit for purpose. • Communication, implementation and measurement of the impact of the People Strategy. • 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. • Targeted advice, support and interventions available via HR business partners for areas of particular recruitment / retention concern relating to key roles. • 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. • Exit and retention surveys in place to identify drivers for both leavers and for those who chose to stay 	<p>Kerena Hunter</p> <p>Kerena Hunter</p> <p>Kerena Hunter</p> <p>Kerena Hunter</p> <p>Kerena Hunter</p> <p>Diane Christie</p> <p>Diane Christie</p> <p>Diane Christie</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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			<ul style="list-style-type: none"> • 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. • Promoting even more regular communications between managers and their teams while working remotely via "Good Conversations" tools etc. • 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. 	<p>Diane Christie</p> <p>Diane Christie</p> <p>Kirsty Ireland</p>	<p>Control</p> <p>Control</p> <p>Control</p>		
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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	24/02/2026	24/05/2026		
<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> <p>Insufficient progress made against stakeholder recommendations.</p>							
Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk
<p>The continuation of a challenging financial and operating environment for Local Government (see risk CRR0009) requires difficult policy decisions to be made in a timely manner, which means continued effective governance and decision making is critical, 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.</p> <p>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.</p> <p>Previous external auditor reports have highlighted</p>	<p>Decisions challenged under judicial review on the appropriateness of the decision-making within KCC.</p> <p>Monitoring Officer / Head of Paid Service statutory report to Council.</p> <p>Reputational damage to the Council.</p> <p>Exceptional Financial Support needs to be requested, or Section 114 Notice issued by the Section 151 Officer.</p>	High		<ul style="list-style-type: none"> • 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 • Effective internal audit arrangements in place and robust monitoring arrangements for the delivery of internal audit recommendations to Governance & Audit Committee • Appropriately detailed and timely financial monitoring reports considered by Cabinet and Cabinet Committees • Appropriate performance reporting of corporate performance to Cabinet, Cabinet Committees and Full Council • Appropriate and effective corporate risk management procedures in place for the Council • 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. 	Dave Shipton	Control	Medium
		16			8		
		Serious (4)			Serious (4)		
		Likely (4)			Unlikely (2)		

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<p>recommendations relating to governance arrangements at the council, for which the External Auditor acknowledged the hard work undertaken by KCC to establish improved governance, including arrangements to support effective decision making and internal assurance. They also commented that further work is needed to complete the improvement journey, for which an action plan is being implemented.</p> <p>A large number of new members have been inducted following the May 2025 local elections, with further training plans developed.</p>			<ul style="list-style-type: none"> • 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. David Whittle • Regular reporting to Governance & 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 a Power BI suite which captures all actions and progress to date. Petra Der Man • Annual Governance Statement (AGS) arrangements in place, providing an overview of the state of the Authority's governance and the controls that are in place to manage key governance risks. Petra Der Man • Member and Officer Codes of Conduct in place and robustly monitored and enforced. Petra Der Man • Member development and training programme in place and overseen by Selection and Member Services Committee. Petra Der Man • Provision for Chief Officers to seek written direction from Executive Members within the KCC Constitution. Petra Der Man • Appropriate officer development and training programme in place and overseen by CMT Diane Christie • Key and significant decision-making process in place for Executive decisions and appropriately published Forward Plan of Executive Decisions. Ben Watts & Petra Der Man • Democratic Services support effective Committee governance and scrutiny arrangements. Ben Watts & Petra Der Man • Dedicated team in place within the Governance & Law functions to improve the awareness and application of governance and decision making across the council. Ben Watts & Petra Der Man 	<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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			<ul style="list-style-type: none">• Governance reviews from across the Local Government sector are analysed to identify any lessons learned and reported to relevant stakeholders, including Governance & Audit Committee.	Ben Watts & Petra Der Man	Control		
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Risk Ref	CRR0039	Risk Title and Event	Assigned To	Last Review da	Next Review			
Information Governance			Benjamin Watts	16/12/2025	16/03/2026			
<p>Failure to embed the appropriate processes, procedures and behaviours to meet regulations. Failure to meet regulatory reporting deadlines. Information security incidents (caused by both human error and / or system compromise) resulting in loss of personal data or breach of privacy / confidentiality. Council accreditation for access to government and partner ICT data, systems and network is withdrawn. Providers and or suppliers processing KCC data fail to embed the appropriate processes and behaviours. Poor data quality negatively impacts AI algorithms</p>								
Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk	
<p>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</p> <p>United Kingdom General Data Protection Regulations (UK GDPR) came into effect that have introduced significantly increased obligations on all data controllers, including the Council.</p> <p>There is insufficient resource available to undertake comprehensive oversight / assurance activity that provides assurance on compliance with existing information governance standards.</p> <p>There is a dependency on the</p>	<p>Information Commissioner's Office sanction (e.g., undertaking, assessment, improvement, enforcement or monetary penalty notice issued against the Authority).</p> <p>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</p> <p>Loss of trust in automated decisions</p>	Medium		<ul style="list-style-type: none"> Services to complete data mapping process for their respective areas 	Asset Owners	-Accepted	01/04/2026	Medium
		15		<ul style="list-style-type: none"> 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 Plus, and regular risk assessments carried out to identify supply chain risks. 	James Church	Control		9
		Significant (3)		<ul style="list-style-type: none"> 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		Significant (3)
		Very Likely (5)		<ul style="list-style-type: none"> Senior Information Risk Owner for the Council appointed with training and support to undertake the role. 	David Whittle	Control		Possible (3)
				<ul style="list-style-type: none"> Caldicott Guardian appointed with training and support to undertake the role 	Sarah Hammond	Control		
				<ul style="list-style-type: none"> 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

<p>Council's Local Authority Trading Companies (CBS) and other material third parties to support Information Governance compliance for the KCC systems and network. KCC services' requirement for non-standard systems creates vulnerabilities. Failure to manage data lawfully when using automated decision making via algorithms.</p>			<ul style="list-style-type: none"> • Staff are required to complete mandatory training on Information Governance and Data Protection and refresh their knowledge every two years as a minimum. • IG policies and procedures have been consolidated supported by communications. Policies reviewed regularly. Data Protection Officer in place to act as a designated contact with the ICO. • Management Guide/operating modules on Information Governance in place, highlighting key policies and procedures. • 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 • Privacy notices as well as procedures/protocols for investigating and reporting data breaches reviewed and updated • Information Resilience and Transparency team in place, providing business information governance support. • The data capture mapping form is in place. Policy guidance requires Information Governance leads to review data maps with the services on a biannual basis, or as and when a new DPIA is created reflected on the data map. • 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. • Cross Directorate Information Governance Working Group in place. 	<p>Benjamin Watts</p> <p>Benjamin Watts</p> <p>Benjamin Watts</p> <p>Benjamin Watts</p> <p>Caroline Dodge</p> <p>Caroline Dodge</p> <p>Hannah Rumball</p> <p>Hannah Rumball</p> <p>Hannah Rumball</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

			<ul style="list-style-type: none">• ICT Commissioning function has necessary working/contractual relationship with the Cantium Business Solutions to require support on KCC ICT compliance and audit.	Sverre Sverreson	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	15/01/2026	15/04/2026		
Oracle Cloud system not fit-for-purpose.							
Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk
<p>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.</p>	<p>1. Impact on finance - unable to carry out month/year end, paying suppliers/providers/clients and staff and receive payments into the Authority. 2. Impact on HR - unable to run payroll and pay staff expenses, phase 2 effects every KCC employee. 3. Services unable to carry out operational duties. 4. Costs to the Oracle Cloud programme will increase as resources to the programme extended. 5. Reputational impact to the Authority.</p>	<p>Medium 10 Major (5) Unlikely (2)</p>		<ul style="list-style-type: none"> Right skills in place to carry out User Acceptance Testing (UAT). Lisa Gannon 	Control		Low
				<ul style="list-style-type: none"> UAT phases - control points for sign off (payroll has a single pass/fail criteria). Lisa Gannon 	Control		5
				<ul style="list-style-type: none"> Build & Functional Test phases for each module built into the programme with sign off required at end of each 'build' phase. Lisa Gannon 	Control		Major (5)
				<ul style="list-style-type: none"> Pre UAT & Training schedule as part of the programme. Lisa Gannon 	Control		Very Unlikely (1)
				<ul style="list-style-type: none"> Any additional spend required for the programme to be discussed at the Oracle Cloud Programme Boards and approved by the SRO. Simon Jones 	Control		
				<ul style="list-style-type: none"> Agree date of 'change freeze' across all applications that interface with Oracle Simon Jones 	Control		
				<ul style="list-style-type: none"> 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		
				<ul style="list-style-type: none"> 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		
				<ul style="list-style-type: none"> Programme Team to provide Internal communications with regular updates and key messages so that information is given in a timely matter. Ben Sherreard 	Control		
				<ul style="list-style-type: none"> Transition / change management planning to be completed. Ben Sherreard 	Control		

Risk Register - Corporate Risk Register

Risk Ref	Risk Title and Event	Assigned To	Last Review da	Next Review
CRR0049	Fraud and Error	Dave Shipton	10/02/2026	10/05/2026
<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"> - false representations made to make a gain or expose another to a loss - failure to notify a change of circumstances to make a gain or expose another to a loss - abuses of position, in which they are expected to safeguard to make a gain or expose another to a loss. <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	
As with any organisation, there is an inherent risk of fraud and/or error that must be acknowledged and proactively managed.	Financial loss leading to pressures on budgets that may impact the provision of services to service users and residents.	Medium		<ul style="list-style-type: none"> • 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 • 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. • Multiple layers of logical, physical and administrative security controls. <p>Linked to CRR0014 Cyber Security Corporate Risk.</p>	Control		Low	
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	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 Moderate (2)			Dave Shipton	Control		5 Minor (1)
	Potential legal challenge. Reputational damage. Poor service delivery. Potentially enabling Serious Organised Crime.	Very Likely (5)			James Church	Control		Very Likely (5)

Risk Register - Corporate Risk Register

<p>fraud/error concerns 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"> • 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. • Scheme of Delegation - compliance with Delegation Matrix and Spending the Council's Money • 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. • 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. • Clear process within relevant Commissioning Departments for procurement under the PCR threshold • With supplier consent, within the Tender Selection Questionnaire and subsequent contract Terms and Conditions. • Communication of mandate fraud / cyber security to KCC supply chain. • Mandatory training - Data Protection and Information Governance training is mandatory and requires staff to refresh periodically. <p>Linked to CRR0014 Cyber Security Corporate Risk.</p>	<p>Clare Maynard</p> <p>Clare Maynard</p> <p>Clare Maynard</p> <p>Clare Maynard</p> <p>Clare Maynard</p> <p>Clare Maynard</p> <p>Clare Maynard</p> <p>Benjamin Watts</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

			<ul style="list-style-type: none"> • Communication, including messaging to encourage increased awareness of information security amongst staff. <p>Linked to CRR0014 Cyber Security Corporate Risk.</p>	Diane Christie	Control		
			<ul style="list-style-type: none"> • Internal Audit includes proactive fraud work in its annual audit plan, identifying potential areas where frauds could take place and checking for fraudulent activity. 	James Flannery	Control		
			<ul style="list-style-type: none"> • Whistleblowing Policy in place for the reporting of suspicions of fraud or financial irregularity 	James Flannery	Control		
			<ul style="list-style-type: none"> • Training and awareness raising is conducted periodically and is included in the Counter-Fraud action plan. 	James Flannery	Control		
			<ul style="list-style-type: none"> • 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. 	James Flannery	Control		
			<ul style="list-style-type: none"> • Anti-fraud and corruption strategy in place and reviewed annually 	James Flannery	Control		
			<ul style="list-style-type: none"> • Counter Fraud Action plan in place to manage resources in conducting reactive and proactive work across KCC. 	James Flannery	Control		
			<ul style="list-style-type: none"> • Participate in the National Fraud Initiative exercise every two years to identify any fraud and error within key risk areas. 	James Flannery	Control		
			<ul style="list-style-type: none"> • KCC Counter Fraud & 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. 	James Flannery	Control		
			<ul style="list-style-type: none"> • Mandate fraud risks are communicated as part of the fraud awareness sessions. 	James Flannery	Control		
			<ul style="list-style-type: none"> • 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. 	Corporate Management Team	Control		

Risk Register - Corporate Risk Register

			<ul style="list-style-type: none"> 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. 	Corporate Management Team	Control		