



KCC Corporate Risk Register Strategic and Corporate Services led risks

FOR PRESENTATION TO POLICY & RESOURCES COMMITTEE – 24/03/22

Corporate Risk Register - Summary Risk Profile

Low = 1-6
Medium = 8-15
High =16-25

Risk No.*	Risk Title	Current Risk Rating	Target Risk Rating	Direction of Travel since March 2021
CRR0004	Simultaneous Emergency Response and Resilience	High (20)	Medium (15)	↓
CRR0009	Future financial and operating environment for local government	High (20)	High (16)	↓
CRR0014	Technological resilience and information security threats	High (20)	High (16)	Revised Risk
CRR0039	Information Governance	High (20)	Medium (12)	↔
CRR0045	Maintaining effective governance and decision making in a challenging financial and operating environment for local government	Medium (10)	Low (5)	↔
CRR0049	Fraud and Error	Medium (12)	Low (6)	↓
CRR0051	Maintaining or Improving workforce health, wellbeing and productivity	High (16)	Medium (8)	↔
CRR0053	Impacts on performance or fulfilment of statutory duties due to Capital Programme affordability	NEW risks – details of controls and ratings being devised by Risk and Control Owners		
CRR0054	Supply Chain and market factors			

*Each risk is allocated a unique code, which is retained even if a risk is transferred off the Corporate Register. Therefore, there will be some 'gaps' between risk IDs.

** Risk rating to be reviewed after local government finance settlement is confirmed.

NB: Current & Target risk ratings: The 'current' risk rating refers to the current level of risk taking into account any mitigating controls already in place. The 'target residual' rating represents what is deemed to be a realistic level of risk to be achieved once any additional actions have been put in place. On some occasions the aim will be to contain risk at current level.

Likelihood & Impact Scales					
Likelihood	Very Unlikely (1)	Unlikely (2)	Possible (3)	Likely (4)	Very Likely (5)
Impact	Minor (1)	Moderate (2)	Significant (3)	Serious (4)	Major (5)

Risk ID	CRR0004	Risk Title	Simultaneous Emergency Response, Recovery and Resilience			
Source / Cause of Risk	Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact	
<p>The County Council, along with other Category 1 Responders in the Kent, has a legal duty to undertake risk assessment and planning to reduce the likelihood and impact of major incidents and emergencies. This includes responses associated with the Government's Counter-terrorism Strategy (CONTEST).</p> <p>Ensuring that the Council works effectively with partners to plan for, respond to, and recover from, emergencies and service disruptions is becoming increasingly important in light of climate change impacts, national and international security threats, severe weather incidents, threats of 'cyber attacks' and uncertainties around implications of the future UK/EU relationship.</p> <p>The response to, and recovery from the Covid-19 pandemic is putting significant strain on organisational capacity and resources.</p>	<p>Failure to deliver suitable planning measures, respond to and manage these events when they occur.</p> <p>Critical services are unprepared or have ineffective emergency and business continuity plans and associated activities.</p> <p>Lack of resilience in the supply chain hampers effective response to incidents.</p> <p>Focus on Covid-19 response and recovery and post UK/EU transition contingency planning means less opportunity to progress other aspects of emergencies and resilience agenda.</p> <p>Future wave(s) of pandemic / winter pressures put further strain on capacity and resource.</p>	<p>Potential increased harm or loss of life if response is not effective.</p> <p>Serious threat to delivery of critical services.</p> <p>Significant harm to the natural and build environment of Kent.</p> <p>Increased financial cost in terms of recovery and insurance costs.</p> <p>Damage and disruption to local businesses and the Kent economy.</p> <p>Potential for public unrest and reputational damage.</p> <p>Legal actions and intervention for failure to fulfill KCC's obligations under the Civil Contingencies Act or other associated legislation.</p>	<p>On behalf of CMT: Rebecca Spore, Director of Infrastructure</p> <p>Responsible Cabinet Member(s): On behalf of Cabinet: Mike Hill, Community & Regulatory Services</p>	<p>Likely 4</p> <p>Target Residual Likelihood Possible (3)</p>	<p>Major (5)</p> <p>Target Residual Impact Major (5)</p>	

Control Title	Control Owner
Management of financial impact to include Bellwin scheme	Cath Head, Head of Finance (Operations)
Kent Resilience team in place bringing together personnel from KCC, Kent Police and Kent Fire and Rescue Service in an integrated and co-located team to deliver enhanced emergency planning and business continuity in Kent	Lisa Guthrie, Head of Kent Resilience Team
On-going programme of review relating to ICT Disaster Recovery and Business Continuity arrangements. ICT resilience improvements are embedded as part of the ICT Transformation Programme.	Dave Lindsay, Interim Head of ICT Strategy and Commissioning
Local multi-agency flood response plans in place for each district/borough in Kent, in addition to overarching flood response plan for Kent	Andy Jeffery , KCC Manager, Kent Resilience Team
Review of Kent Resilience Forum Local Authorities Emergency Planning group's mutual aid arrangements with District Councils and other councils across the region undertaken.	Andy Jeffrey, KCC Manager, Kent Resilience Team
Local procedures have been and are being continually reviewed and refined for occasions the national threat level increases to 'critical'. This includes an update of the Corporate Business Continuity Plan.	Tony Harwood, Resilience and Emergencies Manager
KCC has a Major Emergency Plan that is refreshed regularly	Tony Harwood, Resilience and Emergencies Manager
Ensure business continuity governance arrangements focus on directorate issues and complement KCC's cross directorate resilience groups and forum	Tony Harwood, Resilience and Emergencies Manager
Multi-agency recovery structures are in place	Tony Harwood, Resilience and Emergencies Manager
Emergency planning training rolled out at strategic, tactical and operational levels. Resilience and Emergency planning service business plan in place	Tony Harwood, Resilience and Emergencies Manager
KCC and local Kent Resilience Forum partners have tested preparedness for chemical, biological, radiological, nuclear and explosives (CBRNE) incidents and communicable disease outbreaks in line with national requirements.	Tony Harwood, Resilience and Emergencies Manager / Allison Duggal, Interim Director of Public Health

Work programme implemented to deliver Kent County Council compliance with the Radiation (Emergency Preparedness and Public Information) Regulations 2019, including amendments to the Dungeness Offsite Emergency Plan	Tony Harwood, Resilience and Emergencies Manager
KCC Business Continuity Management Policy and overarching Business Continuity Plan in place, underpinned by business continuity plans at service level.	Rebecca Spore, Director Infrastructure
Legally required multi-agency Kent Resilience Forum in place, with work driven by risk and impact based on Kent's Community Risk Register. Includes sub-groups relating to Health and Severe Weather. KCC Strategic Prevent Lead is now chair of Kent Resilience Forum Delivery Board which reports into Kent Resilience Forum Delivery Group.	Rebecca Spore, Director Infrastructure
KRF and KCC Command and Control structures planned and in place to deal with simultaneous events	Rebecca Spore, Director Infrastructure
Kent & Medway Prevent Duty Delivery Board established (chaired by KCC) to oversee the activity of the Kent Channel Panel, co-ordinate Prevent activity across the County and report to other relevant strategic bodies in the county	Richard Smith, Corporate Director ASCH
The Director of Public Health works through local resilience forums to ensure effective and tested plans are in place for the wider health sector to protect the local population from risks to public health.	Anjan Ghosh, Director of Public Health
Kent and Medway Channel Panel (early intervention mechanism providing tailored support to people who have been identified as at risk of being drawn into terrorism) established at district and borough level.	Nick Wilkinson, Prevent and Channel Strategic Manager
Ongoing development of a PREVENT counter-terrorism risk assessment	Nick Wilkinson, Prevent and Channel Strategic Manager
The annual assurance statement is a self-declaration approved by the Chief Executive/Head of Paid Service which captures the Authority's compliance with the requirements of the Counter Terrorism Act. Actions identified within the annual assurance statement are transferred to the Kent and Medway Action Plan. Kent and Medway Board for PREVENT have oversight of action progress.	Nick Wilkinson, Prevent and Channel Strategic Manager
Implementation of Kent's Climate Adaption Action Plan	Stephanie Holt-Castle, Director of Growth and Communities

Fire Safety Guidance provided by KCC reviewed and updated	Amanda Beer, Corporate Director People and Communications	
Ensure all 13 key Emergency Plans are regularly updated and validated with exercises	Tony Harwood, Resilience and Emergencies Manager	
Ensure 24/7 Emergency Planning cover and response, including a 24/7 Duty Emergency Planning Officer (DEPO), Duty Director, and Recovery Director function, and fully equipped County emergency Centre (CEC)	Tony Harwood, Resilience and Emergencies Manager	
Maintain and support relevant KRF and KCC groups, including KCC Horizon Scanning Group, Cross Directorate Resilience Forum, and Directorate Resilience Groups	Tony Harwood, Resilience and Emergencies Manager	
Action Title	Action Owner	Planned Completion Date
Continued preparations for, and response to, implications of future UK/EU relationship in relation to border friction, regulatory change etc. (cross-reference to CRR0042)	Simon Jones, Corporate Director GET	Ongoing up to July 2022

Risk ID	CRR0009	Risk Title	Future financial and operating environment for Local Government			
Source / Cause of risk	Risk Event	Consequence	Risk Owner (s)	Current Likelihood	Current Impact	
<p>The Government Spending Review in October 2021 has set out the 3-year picture for local government. However, the local government finance settlement announced in December 2021 only provided detailed allocations for 2022-23 to allow scope to update the data and methodology for allocations in later years, which presents a risk (or possible opportunity) for the Council, depending on the nature of the changes.</p> <p>Over the medium term the only additional funding for future spending growth within the settlement comes from council tax, other than for reforms to social care charging, where a separate grant was made available in the settlement for the reforms to social care charging (with further amounts outlined for 2023-24 and 2024-25), with uncertainty as to its sufficiency.</p> <p>The overall settlement for 2022-23 was insufficient to fully fund forecast demand and cost growth pressures facing services across</p>	<p>Levels of spending and price / growth pressures (e.g. revenue inflation) across services outstrip 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. Quality of KCC commissioned / delivered services suffers as financial situation continues to worsen.</p> <p>Continued delays and uncertainty surrounding review of local government funding impacts on KCC's medium term financial planning.</p>	<p>Unsustainable financial situation, ultimately resulting in s114 notice.</p> <p>Failure to delivery 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>Increased and unplanned pressure on resources.</p> <p>Decline in performance.</p> <p>Legal challenge resulting in reputational damage to the Council.</p> <p>Impact on Council Tax.</p>	<p>On behalf of CMT:</p> <p>Zena Cooke, Corporate Director Finance (Section 151 Officer)</p> <p>Responsible Cabinet Member(s):</p> <p>All Cabinet Members</p>	<p>Likely (4)</p> <p>Target Residual Likelihood</p> <p>Likely (4)</p>	<p>Major (5)</p> <p>Target Residual Impact</p> <p>Serious (4)</p>	

the council (even after setting challenging targets to bear down on future cost growth). Background inflation pressures are also a relevant factor.

Uncertainty also applies to services funded via ring-fenced specific grants. Of particular concern is the special educational needs and disability (SEND) provision funded by the Dedicated Schools Grant (DSG). The high needs block of DSG has not kept pace with the substantial increase in demand for SEND (see CRR0044) resulting in deficit accruing on DSG spending.

Control Title	Control Owner
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.	Zena Cooke, Corporate Director Finance (Section 151 Officer)
Regular analysis and refreshing of forecasts to maintain a level of understanding of volatility of demand and cost pressures, which feeds into the relevant areas of the MTFP and business planning process.	Richard Smith, Corporate Director ASCH / Matt Dunkley, Corporate Director CYPE / Simon Jones, Corporate Director GET
Robust budgeting and financial planning in place via Medium Term Financial Planning (MTFP) process, including stakeholder consultation.	Zena Cooke, Corporate Director Finance (Section 151 Officer)

Financial analysis conducted after each budget statement	Dave Shipton, Head of Finance (Policy, Strategy and Planning)	
Ensure evidence of any additional KCC spend required to cover impacts relating to new burdens imposed, e.g. EU exit, Supporting Families grant.	Dave Shipton, Head of Finance (Policy, Strategy and Planning)	
Continued engagement with Government regarding High Needs funding concerns	Matt Dunkley Corporate Director (CYPE) / Christine McInnes, Director of Education / Dave Shipton, Head of Finance (Policy, Strategy and Planning)	
Engagement with CCN, Society of County Treasurers and other local authorities and Government of potential opportunities and issues around devolution and public service reform	David Whittle, Director SPRCA	
KCC Interim Strategic Plan and Strategic Reset Framework developed, outlining how the Council will operate in future, taking into account implications of the Covid-19 pandemic.	David Whittle, Director SPRCA / Amanda Beer, Corporate Director People & Communications	
KCC Quarterly Performance Report monitors key performance and activity information for KCC commissioned or delivered services. Regularly reported to Cabinet.	Rachel Kennard, Chief Analyst, KCC	
Ongoing monitoring and modelling of changes in supply and demand in order to inform strategies and service planning going forward.	Rachel Kennard, Chief Analyst, KCC	
Action Title	Action Owner	Planned Completion Date
Assess impact of and respond to Government plans for the future of social care, including Health and Social Care Integration White Paper. To include assessing and quantifying the costs of social care reforms to analyse sufficiency of additional funding over the medium term to cover the cost of the reforms.	Richard Smith, Corporate Director ASCH / Zena Cooke, Corporate Director Finance	July 2022 – (dependent on further information from Government)
Assessing impact of Government ‘Levelling Up’ White Paper agenda.	David Whittle, Director of Strategy, Policy, Relationships and Corporate Assurance	March 2022 – (review)

Ensuring the achievement of challenging targets in 2022-23 to bear down on future cost growth, particularly in areas of complex / volatile demand, identifying management action where necessary.	Richard Smith, Corporate Director ASCH / Matt Dunkley, Corporate Director CYPE / Simon Jones, Corporate Director GET	March 2023
Outcomes Based Budgeting approach being developed to strengthen links between outcomes and funding, using robust analysis and evidence.	Zena Cooke, Corporate Director Finance	March 2022 (review)

Risk ID	CRR0014	Risk Title	Technological Resilience and Information Security			
<p>Source / Cause of Risk</p> <p>The Council has a duty to protect personal and other sensitive data that it holds on its staff, service users and residents of Kent</p> <p>It should also ensure confidentiality, integrity, availability of its information assets</p> <p>The shift to remote/flexible working, and changes in how services are offered increases need for, and dependency on, resilient IT systems.</p> <p>KCC's ICT Strategy is moving the Authority's technology to cloud based services. It is important to harness these new capabilities in terms of both IT security and resilience, whilst emerging threats are understood and managed.</p> <p>Attempts to gain access to secure networks and servers are increasing nationally and becoming more sophisticated and damaging when they succeed.</p> <p>In information terms the other factor is human. Technology can only provide a level of protection. Our staff must have a strong</p>	<p>Risk Event</p> <p>Information security incidents (caused by both human error and / or system compromise) resulting in loss of data or breach of privacy / confidentiality.</p> <p>Business information is lost, stolen, copied, or otherwise compromised (a breach)</p> <p>Significant business interruption caused by a successful cyber security attack.</p> <p>Successful cyber-attack (e.g., 'phishing' scam or ransomware attack) leading to loss or unauthorised access to sensitive business data.</p>	<p>Consequence</p> <p>Data Protection breach and consequent Information Commissioner's Office (ICO) sanction.</p> <p>Damages claims.</p> <p>Reputational Damage.</p> <p>Potential significant impact on business interruption if systems require shutdown until magnitude of issue is investigated.</p> <p>Loss or corruption of data.</p> <p>Loss of key systems potentially impacting ability to deliver statutory services.</p> <p>Partners unable to discharge their duties</p> <p>Complaints</p>	<p>Risk Owner(s)</p> <p>Lisa Gannon Director of Technology</p> <p>Ben Watts, General Counsel and KCC Data Protection Officer</p> <p>Amanda Beer, Corporate Director People and Communication s</p> <p>Responsible Cabinet Member(s):</p> <p>Peter Oakford, Finance, Corporate and Traded Services</p> <p>Bryan Sweetland Communication s, Engagement,</p>	<p>Current Likelihood</p> <p>Likely (4)</p> <p>Target Residual Likelihood</p> <p>Likely (4)</p>	<p>Current Impact</p> <p>Major (5)</p> <p>Target Residual Impact</p> <p>Serious (4)</p>	

awareness of their responsibilities in terms of IT and information security.	People and partnerships
Control Title	Control Owner
Changes and additions to security controls remains an on-going theme as the authority updates and embraces new technologies.	Dave Lindsay, Interim Head of ICT Strategy and Commissioning
Electronic Communications User Policy, Virus reporting procedure and social media guidelines in place	Dave Lindsay, Interim Head of ICT Strategy and Commissioning
Staff are required to abide by IT policies that set out the required behaviour of staff in the use of the technology provided. These policies are reviewed on an annual basis for appropriateness.	James Church, Interim Head of ICT Compliance and Risk and Digital Accessibility Compliance Officer
Procedures to address data breaches from KCC 'client-side' perspective are covered within the Infrastructure business continuity plan	James Church, Interim Head of ICT Compliance and Risk and Digital Accessibility Compliance Officer
Further training introduced relating to cyber crime, cyber security and social engineering to raise staff awareness and knowledge.	James Church, Interim Head of ICT Compliance and Risk and Digital Accessibility Compliance Officer
External reviews of the Authority's security compliance are carried out to maintain accreditation and confirm best practice is applied.	James Church, Interim Head of ICT Compliance and Risk and Digital Accessibility Compliance Officer
Monthly updated remediation plans produced for the Director of Infrastructure and Senior Information Risk Owner. Quarterly reporting to the Directorate Management Team.	James Church, Interim Head of ICT Compliance and Risk and Digital Accessibility Compliance Officer

Service Partners / Providers liaised with to ensure clarity regarding support available and respective responsibilities to address data breaches should they occur.	James Church, Interim Head of ICT Compliance and Risk and Digital Accessibility Compliance Officer
Persistent monitoring of threats, network behaviours and data transfers to seek out possible breaches and take necessary action.	James Church, Interim Head of ICT Compliance and Risk and Digital Accessibility Compliance Officer
Systems are configured in line with best practice security controls proportionate to the business information being handled. Systems are risk assessed and reviewed to ensure compliance is maintained.	James Church, Interim Head of ICT Compliance and Risk and Digital Accessibility Compliance Officer
A Cyber incident response and management policy has been developed which strengthens the responsibilities and accountabilities across the Authority.	James Church, Interim Head of ICT Compliance and Risk and Digital Accessibility Compliance Officer
Procedure for incident management being reviewed and updated and responses to liaison picked up under consolidated action plan.	James Church, Interim Head of ICT Compliance and Risk and Digital Accessibility Compliance Officer
Data Protection and Information Governance training is mandatory and requires staff to refresh periodically. Progress rates monitored regularly.	Ben Watts, General Counsel and KCC Data Protection Officer / Amanda Beer, Corporate Director People & Communications
Additional messages warning staff of cyber threats are being sent out regularly.	Diane Trollope, Service Manager OD and Engagement
Messages to encourage increased awareness of information security amongst staff are communicated to align with key implementation milestones of the ICT Transformation Programme.	Diane Trollope, Service Manager OD and Engagement

Action Title	Action Owner	Planned Completion Date
Implementation of actions within the Consolidated Security Action Plan, including continuation of roll out of Microsoft and Compliance Package.	Dave Lindsay, Interim Head of ICT Strategy and Commissioning	April 2022 (review)
Business case for a cloud-native security information and event manager for approval by March 2022. Planned implementation date of end of 2022.	Dave Lindsay, Interim Head of ICT Strategy and Commissioning	December 2022

Risk ID	CRR0039	Risk Title	Information Governance			
Source / Cause of risk	Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact	
<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.</p> <p>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>The Covid-19 pandemic has introduced new risks e.g. staff adapting to new ways of working and increasing information security threats.</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>Failure to embed the appropriate processes, procedures and behaviours to meet regulations.</p> <p>Failure to meet regulatory reporting deadlines</p> <p>Information security incidents (caused by both human error and / or system compromise) resulting in loss of personal data or breach of privacy / confidentiality.</p> <p>Council accreditation for access to government and partner ICT data, systems and network is withdrawn.</p> <p>Providers processing KCC data fail to embed the appropriate processes and behaviours.</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 of c£17m.</p> <p>Increased risk of litigation.</p> <p>Reputational damage.</p>	<p>Ben Watts, General Counsel and Data Protection Officer in collaboration with David Whittle, Senior Information Risk Owner</p> <p>Responsible Cabinet Member(s):</p> <p>Roger Gough, Leader</p> <p>Bryan Sweetland Communications, Engagement, People and Partnerships</p> <p>Peter Oakford, Deputy Leader and Cabinet</p>	<p>V. Likely (5)</p> <p>Target Residual Likelihood Possible (3)</p>	<p>Serious (4)</p> <p>Target Residual Impact Serious (4)</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>Member for Corporate and Traded Services</p>
<p>Control Title</p>	<p>Control Owner</p>
<p>Staff are required to complete mandatory training on Information Governance and Data Protection and refresh their knowledge every two years as a minimum.</p>	<p>Ben Watts, General Counsel and KCC Data Protection Officer / Amanda Beer, Corporate Director People and Communications</p>
<p>Senior Information Risk Owner for the Council appointed with training and support to undertake the role.</p>	<p>David Whittle, Director SPRCA</p>
<p>ICT Commissioning function has necessary working/contractual relationship with the Cantium Business Solutions to require support on KCC ICT compliance and audit.</p>	<p>Rebecca Spore, Director Infrastructure</p>
<p>Caldicott Guardian appointed with training and support to undertake the role</p>	<p>Richard Smith, Corporate Director ASCH</p>
<p>Corporate Information Governance group to allow for effective management of information governance risks and issues between the DPO, SIRO and Caldicott Guardian.</p>	<p>Ben Watts, General Counsel and KCC Data Protection Officer</p>
<p>A number of policies and procedures are in place including KCC Information Governance Policy; Information Governance Management Framework; Information Security Policy; Data Protection Policy; Freedom of Information Policy; and Environmental Information Regulations Policy all in place and reviewed regularly. Data Protection Officer in place to act as a designated contact with the ICO.</p>	<p>Ben Watts, General Counsel and KCC Data Protection Officer</p>
<p>Management Guide/operating modules on Information Governance in place, highlighting key policies and procedures.</p>	<p>Ben Watts, General Counsel and KCC Data Protection</p>

		Officer
Privacy notices as well as procedures/protocols for investigating and reporting data breaches reviewed and updated		Caroline Dodge, Team Leader Information Resilience & Transparency
Information Resilience and Transparency team in place, providing business information governance support.		Caroline Dodge, Team Leader Information Resilience & Transparency
Cross Directorate Information Governance Working Group in place.		Michael Thomas-Sam, Strategic Business Adviser Social Care
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		Ben Watts, General Counsel and KCC Data Protection Officer
Action Title	Action Owner	Planned Completion Date
Continuation of roll out of Microsoft Security and Compliance Package	Dave Lindsay, Interim Head of ICT Strategy and Commissioning	April 2022 (review)
Detailed action plan is being prepared for changes to the recording of data breaches and identification.	Ben Watts, General Counsel and KCC Data Protection Officer	March 2022
Working from Home Information Governance and Records Management audit implementation of recommendations	Ben Watts, General Counsel / David Whittle, Director SPRCA	March 2022
Each directorate is responsible for carrying out data mapping exercises to find out what personal data is held and to understand how the information flows through the organisation	Michael Thomas-Sam, Chair of Cross-Directorate Information Governance Working Group	March 2022

Risk ID	CRR0045	Risk Title	Maintaining effective governance and decision making in a challenging financial and operating environment for local government			
Source / Cause of risk	Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact	
<p>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. Elected Members may require additional training and expertise to enable capability of effective challenge.</p>	<p>Members are unwilling or unable to agree necessary policy (service) decisions to deliver a legally balanced budget and sustainable medium-term financial plan (MTFP).</p>	<p>Decisions challenged under judicial review on the appropriateness of the decision-making within KCC.</p>	<p>David Cockburn, Head of Paid Service</p>	<p>Unlikely (2)</p>	<p>Major (5)</p>	
	<p>Members agree a budget requiring unrealistic and undeliverable efficiency savings leading to significant in-year overspends.</p>	<p>Monitoring Officer / Head of Paid Service statutory report to Council.</p>	<p>Zena Cooke, Corporate Director Finance (s151 Officer)</p>	<p>Target Residual Likelihood</p> <p>V. Unlikely (1)</p>	<p>Target Residual Impact</p> <p>Major (5)</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>Reputational damage to the Council.</p> <p>S114 Notice issued by the S151 Officer.</p>	<p>Ben Watts, General Counsel and Monitoring Officer</p> <p>Responsible Cabinet Member(s):</p> <p>Roger Gough, Leader of the Council</p> <p>Peter Oakford, Deputy Leader and Cabinet Member for Corporate and Traded Services</p>			

Control Title	Control Owner
Interim Strategic Plan agreed by County Council and published setting out objectives and priorities for the Council in 2021/22.	Roger Gough, Leader of the Council
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	Zena Cooke, Corporate Director Finance (Section 151 Officer)
Effective internal audit arrangements in place and robust monitoring arrangements for the delivery of internal audit recommendations to Governance & Audit Committee	Zena Cooke, Corporate Director Finance (Section 151 Officer)
Appropriately detailed and timely financial monitoring reports considered by Cabinet and Cabinet Committees	Zena Cooke, Corporate Director Finance (Section 151 Officer)
Governance reviews from across the Local Government sector are analysed to identify any lessons learned and reported to relevant stakeholders, including Governance & Audit Committee.	Zena Cooke, Corporate Director Finance (Section 151 Officer)
Appropriate officer development and training programme in place and overseen by CMT	Amanda Beer, Corporate Director People and Communications
Appropriate and effective corporate risk management procedures in place for the Council	David Whittle, Director SPRCA
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, Director SPRCA
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.	David Whittle, Director SPRCA
Key and significant decision-making process in place for Executive decisions and appropriately published Forward Plan of Executive Decisions	Ben Watts, General Counsel and KCC Data Protection Officer
Annual Governance Statement (AGS) arrangements in place with returns made across both senior and statutory officers	Ben Watts, General Counsel and KCC Data Protection Officer

Democratic Services support effective Committee governance and scrutiny arrangements	Ben Watts, General Counsel and KCC Data Protection Officer	
Member and Officer codes of conduct in place and robustly monitored and enforced	Ben Watts, General Counsel and KCC Data Protection Officer	
Member development and training programme in place and overseen by Selection and Member Services Committee	Ben Watts, General Counsel and KCC Data Protection Officer	
Provision for Chief Officers to seek written direction from Executive Members within the KCC Constitution	Ben Watts, General Counsel and KCC Data Protection Officer	
Appropriate performance reporting of service and corporate performance to Cabinet, Cabinet Committee and Full Council	David Cockburn, Head of Paid Service	
Transformation plans and/or business cases for strategic change underpinning MTFP shared with non-executive members through Cabinet Committees as part of the executive decision-making arrangements	David Cockburn, Head of Paid Service	
Action Title	Action Owner	Planned Completion Date
Review of KCC Policy and Control Framework and Operating Standards	David Whittle, Director SPRCA	September 2022 (review)

Risk ID	CRR0049	Risk Title	Fraud and Error			
Source / Cause of risk	Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact	
<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.</p> <p>It is critical that management implements a sound system of internal control and demonstrates commitment to it at all times, and that investment in fraud prevention and detection technology and resource is sufficient.</p> <p>This includes ensuring that new emerging fraud/error issues are sufficiently risk assessed.</p>	<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:</p> <ul style="list-style-type: none"> - false representations are 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 their position, in which they are expected to safeguard to make a gain or expose another to a loss. 	<p>Financial loss leading to pressures on budgets that may impact the provision of services to service users and residents</p> <p>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.</p>	<p>On behalf of CMT:</p> <p>Zena Cooke, Corporate Director Finance (Section 151 Officer)</p> <p>Responsible Cabinet Member(s):</p> <p>Peter Oakford, Finance, Corporate and Traded Services</p>	<p>Possible (3)</p> <p>Target Residual Likelihood</p> <p>Unlikely (2)</p>	<p>Serious (4)</p> <p>Target Residual Impact</p> <p>Significant (3)</p>	
Control Title				Control Owner		
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				Nick Scott, Operations Manager, Kent Intelligence Network / James Flannery, Counter-Fraud Manager KCC		

Training and awareness raising is conducted periodically	Amanda Beer, Corporate Director People and Communications / James Flannery, Counter-Fraud Manager
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.	Dave Shipton, Head of Finance (Policy, Strategy and Planning)
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, Head of Internal Audit
Whistleblowing Policy in place for the reporting of suspicions of fraud or financial irregularity	James Flannery, Counter-Fraud Manager
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, Counter-Fraud Manager
Anti-fraud and corruption strategy in place and reviewed annually	James Flannery, Counter-Fraud Manager
Counter Fraud Manager liaises with CMT regarding all new policies, initiatives and strategies to be assessed for the risk of fraud, bribery and corruption through engagement with the Counter Fraud Team.	James Flannery, Counter-Fraud Manager
Systems of internal control which aim to prevent fraud and increase the likelihood of detection	Statutory Officers / Corporate Management Team
Fraud risk assessments have been developed by the Counter-Fraud team and are being considered by service directorates to aid awareness and facilitate appropriate mitigations.	Directorate Management Teams
Commissioning standards reviewed, including rules relating to "Spending the Council's Money", which have been clarified.	Clare Maynard, Interim Strategic Commissioner

Risk ID	CRR0051	Risk Title	Maintaining or Improving workforce health, wellbeing and productivity			
Source / Cause of risk	Risk Event	Consequence	Risk Owner	Current Likelihood	Current Impact	
The council's workforce is substantially adapting the way it operates and delivers services.	Lack of managerial capacity and / or capability to deliver in new environment	Increased absence levels	On behalf of CMT:	Likely (4)	Serious (4)	
Hybrid/flexible working in the delivery of services brings with it opportunities to accelerate programmes of change, improve productivity, wellbeing and promote our employer brand, but also, in the short term at least, risks that require close monitoring and management.	Staff mental and physical fatigue due to prolonged period of response and recovery, while adapting to a new working environment.	Impact on productivity (could be positive or negative)	Amanda Beer, Corporate Director People and Communication s	Target Residual Likelihood	Target Residual Impact	
Staff across the organisation continue to work under significant operational pressures and capacity constraints.	Lack of depth / resilience of key personnel or teams.	Recruitment and retention challenges.		Unlikely (2)	Serious (4)	
	Insufficient capacity should future wave of winter pressures materialise.		Responsible Cabinet Member(s):			
			Bryan Sweetland Communication s, Engagement, People and Partnerships			
Control Title				Control Owner		
Regular engagement with recognised trades unions.				Paul Royel, Head of HR and OD		
KCC's Organisation Design principles have been refreshed to ensure they remain fit for purpose.				Paul Royel, Head of HR and OD		
Comprehensive resources and tools available for staff to access, including Support Line counselling services, I-resilience tool, mindfulness and wellbeing sessions, tailored to staff groups as appropriate.				Amanda Beer, Corporate Director People and Communications		

Additional guidance for staff on Display Screen Equipment self-assessments when working from home on a semi-permanent basis.	Amanda Beer, Corporate Director People and Communications	
Health & Safety team support for services, including updated Covid-19 related advice and guidance e.g. with Task Safety Analysis and supporting use of premises safety during response and recovery.	Amanda Beer, Corporate Director People and Communications	
Working and Wellbeing Surveys conducted, to build understanding of current picture and inform future planning and action with managers, alongside regular reviews of a suite of management information.	Diane Trollope, Head of Engagement and Consultation	
Refocused medium-term Organisation Development Plan	Diane Trollope, Head of Engagement and Consultation	
Intranet site contains dedicated Covid-19 area, with latest advice and guidance - including staff FAQs, Keeping Well, Comfort and Safety and Remote Working.	Diane Trollope, Head of Engagement and Consultation	
Promoting even more regular communications between managers and their teams while working remotely via "Good Conversations" tools etc.	Diane Trollope, Head of Engagement and Consultation	
KCC's values, behaviours and culture embedded by managers, linked to KCC Strategic Reset programme.	Diane Trollope, Head of Engagement and Consultation	
Action Title	Action Owner	Planned Completion Date
Development of a new People Strategy for 2022-2027.	Paul Royel, Head of HR and OD	April 2022