

APPENDIX 1: Corporate Risk Register

Risk Register - Corporate Risk Register

Current Risk Level Summary

Green	0	Amber	4	Red	13	Total	17
Current Risk Level Changes							

0	1	1	0	9
0	0	0	1	3
0	0	0	0	2
0	0	0	0	0
0	0	0	0	0

Risk Ref	Risk Title and Event	Assigned To	Last Review date	Next Review
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CRR0009	Future financial and operating environment for Local Government	John Betts	25/03/2024	25/06/2024
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Levels of spending and growth pressures across services outstrip the Council's core spending power, threatening the financial sustainability of KCC, its partners and service providers.

In order to set a balanced budget, the council is likely to have to continue to make significant year on year savings.

Quality of KCC commissioned / delivered services suffers as financial situation continues to worsen.

Continued delays and uncertainty surrounding review of local government funding impacts on KCC's medium term financial planning.

Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk	
The Government's Autumn Budget 2023 statement only included very high-level public spending plans and no individual department plans beyond 2024-25, and the Local Government Finance Settlement only covered 2024-25 with no indicative allocations for subsequent years. This means that although the funding for 2024-25 is now confirmed, the forecasts for later years are speculative, consequently planning has to be sufficiently flexible to respond	Unsustainable financial situation and potential drawdown from reserves, ultimately resulting in s114 notice.	High		<ul style="list-style-type: none"> Outcomes Based Budgeting approach being developed to strengthen links between outcomes and funding, within resource envelopes, using robust analysis and evidence that includes aligning performance and finance information. 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. Monthly budget reviews involving the Chief Executive Officer, section 151 Officer and Corporate Directors to scrutinise progress against agreed budget savings. Quarterly budget meetings between Cabinet Member for Finance and Corporate Director for Finance with Cabinet Members and Corporate Directors as relevant. 	-Accepted	28/06/2024	High	
	Failure to delivery statutory obligations and duties or achieve social value.	25 Major (5)						16 Serious (4)
	Potential for partner or provider failure – including sufficiency gaps in provision.	Very Likely (5)			Control			Likely (4)
	Reduction in resident satisfaction and reputational damage.				Control	John Betts		
	Increased and unplanned pressure on resources.				Control			
	Decline in performance.				Control			

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<p>accordingly. Even so, it is clear that 2024-25 and the medium term to 2026-27 are likely to continue to be exceptionally challenging and will require significant spending reductions. Even though overall net cash is increasing, this is not sufficient to keep pace with forecast spending demands. There is also no certainty that additional central government funding to address spending pressures in social care will be baselined/continued for future years. The level of savings required in 2024-25 and over the medium term continues to be higher than in recent years driven largely by growth in spending rather than cuts in funding, representing a new and very specific challenge. A significant financial risk for the Council is the continuing and increasing underlying deficit and accumulated debt on the High Needs Block of Dedicated Schools Grant (DSG), a forecast total of £178m as at 31st March 2024 (excluding contributions from KCC and DfE).</p> <p>No further monies were allocated to local authorities in the 2023 Autumn Statement.</p>	<p>Legal challenge resulting in reputational damage to the Council.</p> <p>Impact on Council Tax.</p>		<ul style="list-style-type: none"> • Forecasts for future spending growth to be revised as necessary once estimates become more certain and only finalised in controllable budgets once uncertainties have been resolved. John Betts • Robust budgeting and financial planning in place via Medium Term Financial Planning (MTFP) process, including stakeholder consultation. John Betts • Regular review of HM Treasury forecasts and Government planned spending levels for Local Government. John Betts • KCC Strategic Reset Programme established and reprioritised to focus on key budget delivery programmes. Amanda Beer • Budget Recovery Strategy - Securing Kent's Future - set, to address the in-year and future years' financial pressures the council is facing and the specific and broader action that can be taken to return the council to financial sustainability. Roger Gough • Financial analysis conducted after each Chancellor of the Exchequer Budget Statement to review potential implications for future local government settlements. Dave Shipton • 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 • 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 • Ongoing policy analysis of the devolution agenda and devolution deals agreed by the government. David Whittle • Regular monitoring and oversight of progress against KCC's 'Safety Valve' agreement with the Department for Education (DfE). Sarah Hammond 	<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"> • KCC Quarterly Performance Report monitors key performance and activity information for KCC commissioned or delivered services. Regularly reported to Cabinet. 	Matthew Wagner	Control		
			<ul style="list-style-type: none"> • Ongoing monitoring and modelling of changes in supply and demand in order to inform strategies and service planning going forward. 	Matthew Wagner	Control		
			<ul style="list-style-type: none"> • 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. 	Corporate Directors CD	Control		
			<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, charges to waste collection arrangements etc. 	Corporate Directors CD	Control		

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Risk Ref	CRR0053	Risk Title and Event	Assigned To	Last Review da	Next Review			
		Capital Programme Affordability (impacts on assets, performance and statutory duties)	John Betts	25/03/2024	25/06/2024			
<p>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.</p>								
Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk	
<p>The affordability of the capital programme presents a number of risks to specific programmes, including Highways, Schools and the KCC Estate more broadly. The uncertainty includes capital expenditure funded by grants, many of which are crucial to delivery of statutory services, Ongoing investment to maintain and modernise our assets competes with the priority to protect frontline services from effects of public sector funding restraint. There are a number of geo-political uncertainties in the current environment which additionally impact on the financial and operating environment. The construction industry is experiencing acute inflation pressures, long material lead time and sporadic material supply. Directly linked to material and labour shortages. Current inflationary pressures are impacting on the capital</p>	<p>Business interruption due to increasing level of reactive / emergency repairs, or parts of estate decommissioned (in whole or partially if deemed unsafe). Health and safety incidents (potentially serious) associated with asset degradation. Inability to meet statutory duties e.g. lack of appropriate school place provision. Non-priority sites may not be maintained to a sufficient standard and may not be safe and fit for purpose leading to building closures. Assets not maintained sufficiently now will require future additional spend to maintain with the possibility of reactive costs which may create a revenue pressure. Delays result in additional inflationary costs. Funding annual rolling programmes from borrowing is unsustainable. Reputational damage as a result of building closures or any impact on service delivery</p>	High		<ul style="list-style-type: none"> Recruitment to 2 x Premises Officers to visit schools and support them with forecasting maintenance budgets Papers to Secretary of State seeking approval to increase school financial thresholds 10 year capital programme published as part of the 24-34 capital programme. This identified projected costs for some of the rolling programmes and a separate section of potential stand-alone projects which are markers, and will need to have a full business case and identified funding planned evaluated and agreed. Extensive lobbying of Government in relation to capital funding. Asset safety factors associated with our assets are given priority during the budget setting process. Health and Safety Team in place in advisory capacity to ensure compliance to Government and HSE and guidelines. An annual programme of planned preventative maintenance is undertaken at KCC sites by the relevant Facilities Management contract partners The most urgent works will be completed on the agreed, prioritised sites. 	Joanne Taylor Joanne Taylor Cath Head John Betts John Betts Maria Kelly Anthony Carty Joanne Taylor	A -Accepted A -Accepted Control Control Control Control Control	30/09/2024 30/06/2024	High 16 Serious (4) Likely (4)

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<p>programme significantly. Expectations of key stakeholders on capital spend. Risks associated with changes in legislation related to developer contributions. This could lead to a requirement for significant forward funding. The level of borrowing to fund the capital programme is not sustainable and the impact on the revenue budget is significant.</p>				<ul style="list-style-type: none"> • Infrastructure works with Assistant Education Directors to communicate to schools regarding their obligations for maintenance and their responsibilities for repairs under financial thresholds • External funding bid for 'schools rebuilding programme' (DfE) was submitted, and successful for Birchington Primary School. • Review of KCC estate – Future Assets Programme. Business cases for each of the three workstreams are being developed (Office Estate, Community Buildings, Specialist Assets) with associated consultations. • Lobbying central Government re capital grants relating to Highways. 	<p>Joanne Taylor</p> <p>Joanne Taylor</p> <p>Rebecca Spore</p> <p>Haroona Chughtai</p>	<p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p>		
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Risk Ref	CRR0059	Risk Title and Event	Assigned To	Last Review da	Next Review			
		Significant failure to bring forecast budget overspend under control within budget level assumed	John Betts	25/04/2024	25/07/2024			
<p>Further management action being put in place for the remainder of the current financial year fails to significantly reduce forecast overspend. Risk of significant adverse variance to the level of savings and income agreed in KCC's budget.</p> <p>Spending growth pressures exceed forecasts.</p>								
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 latest revenue forecast position for 2023-24 before further management action was an overspend of £30m (excluding schools), based on Q3 actuals (reported 21st March 2024).</p> <p>The most significant overspends (and budgeted spending growth) in both 2022-23 and 2023-24 are in adult social care and children's services.</p> <p>Urgent action is required to bring revenue spending down to a sustainable level, both within the current financial year and over the medium term (see CRR0009) to safeguard the council's</p>	<p>As at 31/3/22 the council's total usable revenue reserves represented 32.2% of net revenue (down from 35.8% at the start of the year excl. reserves for Covid-19 business rates reliefs).</p> <p>The level of reserves as % of revenue and sustainability of reserves based on recent levels of drawdown put the council at the top of the lower quartile of county councils.</p> <p>Council reserves further depleted below a sustainable position.</p> <p>Impact on service delivery.</p> <p>More imminent danger of financial failure – ultimately issuing of s114 notice by Corporate Director Finance (s151 Officer).</p> <p>Negative impact on MTFP three year plan.</p> <p>Council reserves pushed below a sustainable position</p>	<p>High</p> <p>25</p> <p>Major (5)</p> <p>Very Likely (5)</p>		<ul style="list-style-type: none"> To maximise scope of effective scrutiny by all Members, there will be a review of meetings and agendas to ensure appropriate focus on core activity on the budget, key decisions and performance relating to "Securing Kent's Future", including regular finance update reports to Cabinet, Scrutiny Committee and Policy and Resources Committee. Council's Budget Strategy, linked to Securing Kent's Future, confirmed at County Council Budget meeting in February 2024 and confirms key principles to abide by. Any adverse variations to agreed savings / income are swiftly identified with compensating actions agreed with management. Section 151 Officer meeting weekly with the Leader, Deputy Leader (Cabinet Member for Finance), Chief Executive Officer and Monitoring Officer to provide progress updates. Finance and performance monitoring progress reports will be considered at every Cabinet meeting to ensure the focus on Securing Kent's Future remains until the council's financial position is stabilised. 	<p>Benjamin Watts</p> <p>John Betts</p> <p>John Betts</p> <p>John Betts</p>	<p>A -Accepted</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p>	<p>31/07/2024</p>	<p>Medium</p> <p>9</p> <p>Significant (3)</p> <p>Possible (3)</p>

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<p>financial resilience and viability.</p>	<p>Impact on service delivery</p> <p>More imminent danger of financial failure – ultimately issuing of s114 notice by Corporate Director Finance (s151 Officer)</p> <p>Negative impact on MTFP three-year plan.</p>		<ul style="list-style-type: none"> • Budget monitoring will continue to include a full report on all budgets on a quarterly basis with exception reports in the intervening months focussing on the largest and most volatile areas of spending. John Betts • Savings delivery plans and monitoring processes in place. John Betts • Analysis and enhancements to financial reporting introduced to better identify the underlying drivers for the main budget variances and the impacts and dependencies of management action and policy choices to reduce the forecast overspend. John Betts • Quarterly budget meetings between Cabinet Member and Finance and Corporate Directors John Betts • The Council's Financial Regulations (and delegation levels within), "Spending the Council's Money" and Code of Corporate Governance, to ensure they remain fit for purpose in the current environment. John Betts • Robust delivery plan information has been developed for 2024/25 – milestones, risks, dependencies etc, and will be reported to Strategic Reset Board. Dave Shipton • Analytics function used to undertake detailed analysis of the main areas of overspend. Matthew Wagner • Equality Impact Assessment screening will be completed for any alternative and / or additional savings necessary under the recovery plan. Corporate Management Team 	<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"> • Budget Recovery Plan - Securing Kent's Corporate Future - being developed to address in-year forecast overspend and outline a pathway to future financial sustainability. This includes focusing predominantly on the material spending areas of council activity and those with the greatest forecast variances from the approved budget in adults and children's services. 	Corporate Management Team	Control		
			<ul style="list-style-type: none"> • Any adverse variations to agreed savings / income are swiftly identified with compensating actions agreed with management. 	Corporate Management Team	Control		
			<ul style="list-style-type: none"> • Resource Accountability Statements signed off by Corporate Directors. 	Corporate Management Team	Control		

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Risk Ref	CRR003	Risk Title and Event	Assigned To	Last Review da	Next Review			
		Securing resources to aid economic growth and enabling infrastructure	Simon Jones	03/04/2024	03/07/2024			
<p>The inability to secure sufficient funding, including contributions from development, to deliver the infrastructure necessary to support growth may require gap funding in order for KCC to fulfil its statutory duties. Deferral of developer contributions and / or elongated planning consents leads to delayed or compromised infrastructure. Whilst future details and guidance are awaited regarding implementation of the Levelling Up and Regeneration Act from Central Government, this presents significant financial risk dependent upon emerging policy.</p>								
Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk	
<p>The economy in Kent & Medway has been impacted by the Covid pandemic, inflation and other world events, and the impacts could be disproportionate across the county (e.g., in coastal areas). To gain an understanding of the implications, an impact assessment has been conducted, which has led to the preparation of an Economic Framework for the County, which aims to act as a stimulus for improvement. The Council actively seeks to secure the resources/funding necessary to provide the infrastructure required to support growth, which often need to be bid for in very tight timescales and are increasingly subject to the drive to deliver economic impact, housing and employment outputs. At a local level there is often a significant gap between the overall costs of the infrastructure required and the</p>	<p>Key opportunities for growth missed. The Council finds it increasingly difficult to fund services and match-fund infrastructure across Kent and fully mitigate the overall impact of housing growth on KCC services and, therefore communities. Kent becomes a less attractive location for inward investment and business. Our ability to deliver an enabling infrastructure becomes constrained. Reputational risk associated with delayed delivery of infrastructure required. Additional revenue costs incurred due to infrastructure delays and operational costs increasing.</p>	<p>High 25 Major (5) Very Likely (5)</p>		<ul style="list-style-type: none"> Formulate countywide transport policy and strategy with Member Task & Finish Group and Cabinet. 	Lee Burchill	A -Accepted	29/11/2024	High 16
				<ul style="list-style-type: none"> Kent & Medway Economic Framework 	Steve Samson	A -Accepted	28/06/2024	Serious (4) Likely (4)
				<ul style="list-style-type: none"> Develop an implementation plan for Kent & Medway Framework with KMEP sub-groups and local stakeholders for taking forward the ambitions and action areas set out in the framework 				
				<ul style="list-style-type: none"> Kent Design Guide to be published – will influence and provide people with expectations and standards that we expect. 	Tom Marchant	A -Accepted	31/03/2025	
				<ul style="list-style-type: none"> Multi-agency Kent and Medway Employment Task Force has been established. 	David Smith	Control		
				<ul style="list-style-type: none"> Kent & Medway Economic Framework delivered against. 	Steve Samson	Control		
				<ul style="list-style-type: none"> Specific business support packages, including the Kent & Medway Business Fund, Economic Recovery and Resilience Plan, Arts Investment Fund etc. 	Steve Samson	Control		
				<ul style="list-style-type: none"> Strong engagement of private sector through Kent and Medway Economic Partnership (KMEP), Business Advisory Board and Kent Developer Group 	Steve Samson	Control		
<ul style="list-style-type: none"> Monitoring of socio-economic data and trends and development of responses to changed economic trends. 	Steve Samson	Control						

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<p>Council's ability to secure sufficient funds through the current funding systems, including Section 106 contributions, Community Infrastructure Levy and other growth levers.</p> <p>The Levelling Up and Regeneration Act introduces proposals to totally replace the existing 106 / CIL system with a new Infrastructure Levy. This may result in further risk for KCC.</p>				<ul style="list-style-type: none"> • Teams across the Growth, Environment and Transport directorate work with each individual District on composition of local infrastructure plans including priorities for the CIL and Section 106 contributions, to articulate needs for the demands on services • Government consultations on proposals for reform of the planning system in England considered and responded to. • The KCC Developer Contributions Guide has been updated and adopted. • Infrastructure Mapping Platform being piloted in East Kent before countywide rollout, setting out the infrastructure needed to deliver planned growth. • Single Monitoring System (SMS) is used to track individual s106 planning obligations from the Council's initial request for developer contributions through the issue of invoice for payment • Responses are made to emerging Government strategies 	<p>Tom Marchant</p> <p>Tom Marchant</p> <p>Tom Marchant</p> <p>Tom Marchant</p> <p>Stephanie Holt-Castle</p> <p>Stephanie Holt-Castle</p>	<p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p>		
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Risk Ref	CRR0042	Risk Title and Event	Assigned To	Last Review da	Next Review			
		Border Fluidity, infrastructure and regulatory arrangements	Simon Jones	10/04/2024	10/07/2024			
<p>That changes in border customs, checking and processing routinely disrupt local communities and both the strategic and local road networks.</p> <p>That the Government does not provide sufficient capital and revenue financial support to departments, agencies, local authorities and other infrastructure stakeholders necessary to address the necessary infrastructure, legislation and controls to ensure a long term plan for frictionless border movements.</p>								
Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk	
<p>Changes at the UK border with Europe means additional controls now exist on the movement of goods and people between the UK and the EU.</p> <p>The UK Government and the EU have introduced new border controls and further changes are being introduced including the new Entry/Exit System (EES).</p> <p>KCC has been working with partners at a local and national level to assess potential implications for the county and prepare for various scenarios. KCC is reliant on coherent, coordinated governance and information across Government to aid the Local Authority and partners locally in planning their contingency arrangements and responding appropriately.</p>	<p>Significant slowdown in the existing flow of goods and people through the Kent Ports leads to long delays in accessing Dover Ports and Eurotunnel.</p> <p>Impacts on major traffic routes as a result of Operation Brock and other mitigations for port delays and the consequential increase in local and pan Kent road journey times, impacting on local residents and businesses.</p> <p>Significant detrimental impact on county's economic competitiveness, attractiveness for inward investment and quality of life for Kent residents.</p> <p>Significant increase in imported goods subject to statutory checks by Trading Standards including consumer goods and animal feeds.</p> <p>Imported animals now subject to welfare checks at Border controls posts, breaches of welfare subject to investigation by Trading Standards.</p> <p>Shortages and delay may impact supply chains.</p> <p>Interruption and affect on business services, both statutory</p>	High		<ul style="list-style-type: none"> Working with Government to develop short, medium and long-term plans for border resilience looking at infrastructure and technological solutions. 	Toby Howe	A -Accepted	31/07/2024	High
		25		<ul style="list-style-type: none"> Regular presentations to Cabinet Committee on potential impacts relating to people and goods. 	Simon Jones	A -Accepted	30/10/2024	Serious (4)
		Major (5)		<ul style="list-style-type: none"> Preparation for impacts of two separate but interconnected schemes that will affect non-EU citizens travelling to most EU countries; implementation of the EU Entry/Exit System (EES) system and the EU European Travel Information and Authorisation System (ETIAS). 	Andy Jeffery	A -Accepted	31/07/2024	Likely (4)
		Very Likely (5)		<ul style="list-style-type: none"> Carry out exercises to test internal KCC business continuity and response plans 	Andy Jeffery	A -Accepted	30/06/2024	
				<ul style="list-style-type: none"> KCC contributes to the Kent & Medway Resilience Forum Operation Fennel strategic plan 	Toby Howe	Control		
				<ul style="list-style-type: none"> Regular engagement with senior colleagues in relevant Government Departments. 	Simon Jones	Control		
				<ul style="list-style-type: none"> Several training exercises have taken place to prepare for various scenarios and to ensure staff competency is maintained. 	Andy Jeffery	Control		
				<ul style="list-style-type: none"> KCC are part of the Operation Fennel Strategic and Tactical Groups (multi agency planning groups for potential disruption at Port of Dover and Eurotunnel). These groups plan work across KMRF to prepare for the impacts of EES and KCC contribute towards this work. 	Andy Jeffery	Control		

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	<p>and discretionary, such as: Adult's and children's social care workers being able to reach necessary areas. Care homes in the affected areas. Officers and Community Wardens working in affected areas. Critical infrastructure including schools, KCC buildings and other KCC responsible areas.</p>			<ul style="list-style-type: none"> • KCC are leading on the Kent and Medway Resilience Forum which undertakes EES planning work. • Government funding to support improving access to the borders. • A KCC EES planning structure has been implemented which manages EES on behalf of CDRF. • KCC contribution to multi-agency communications in the 'response' phase, and leadership of communications in the 'planning' and 'recovery' phases • KCC services are continually reviewing business continuity arrangements, taking potential scenarios into consideration, with co-ordination via Directorate Resilience Group. • KCC membership of the Delivery Models Operational Group and associated working groups such as Emergency Planning, Infrastructure etc. • Recruited additional staff for Port Team and animal health officers to provide capacity. 	<p>Andy Jeffery</p> <p>Andy Jeffery</p> <p>Andy Jeffery</p> <p>Christina Starte</p> <p>Service Managers</p> <p>Steve Rock Trading Standards</p> <p>Steve Rock Trading Standards</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 Ref	CRR0052	Risk Title and Event	Assigned To	Last Review da	Next Review
		Adaptation of KCC Services to Climate Change impacts.	Simon Jones	02/04/2024	02/07/2024

Adverse impacts on KCC services – buildings (lost or stranded assets), staff (sickness and lower productivity), service users, and the public.

Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk
Impacts of Climate Change, particularly in relation to weather changes on KCC and the services KCC provides or commissions.	Sustained deterioration of public health and increasing health inequalities across the county. Economic impacts from asset destruction/deterioration, service disruption and recovery costs of extreme weather events. Degradation and loss of Kent's key ecosystems, impacting the health and viability of our natural environment/protected areas and Kent's ability to effectively mitigate and adapt to climate change. Negative impact on Kent economy and wellbeing of Kent residents. Inability to keep public safe and moving around the network. Reputational damage due to customer dissatisfaction.	High		<ul style="list-style-type: none"> Adaptation Programme actions - Kent wide plan e.g. building differently, active travel, farming practices, flood management, partnership working – 2050 target. Environmental risk to be built into project work Kent Environment Strategy – actions re emissions reduction, travel, air quality – outputs – link to Net Zero 2050 Strategic Statement – Priority 3 re Environment Estate rationalisation and building in additional measures to reduce emissions. ISO 14001 accreditation (the international standard for Environmental Management Systems) implemented and maintained 	A -Accepted	31/07/2024	High
		25			Control		16
		Major (5)			Control		Serious (4)
		Very Likely (5)			Control		Likely (4)
					Control		
					Control		

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Risk Ref	CRR0015	Risk Title and Event	Assigned To	Last Review da	Next Review			
		Sustainability of the Social Care Market	Richard Smith	04/03/2024	04/06/2024			
<p>Social Care market is not sustainable. Inability to obtain the right kind of provider supply at affordable prices. Significant numbers of care home closures or service failures. Increases in hand backs of care Providers choose not to tender for services at Local Authority funding levels or accept service users with complex needs.</p>								
Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk	
<p>Local Authorities have a statutory duty to provide a viable and sustainable social care market to meet the needs of the local population who meet Care Act eligibility.</p> <p>The main risks associated with care market instability are: Financial – As a result of the increasing cost and complexity of demand for services and constrained local authority budgets compounded by recent inflation. Workforce - inflation running at a high level and cost of living crisis affecting adult social care workforce, which is paid less favourably than comparative sectors leading to high vacancy levels, and high staff turnover rates particularly in the home care sector.</p> <p>There are particular challenges in Kent in the residential sector.</p>	<p>Gaps in the care market for certain types of care or in geographical areas meaning difficulty in placing some service users. Unable to offer care packages immediately leading to delays with discharging from Health Services Reduction in quality of care provided due to workforce pressures Significant numbers of care home closures or service failures.</p>	High		<ul style="list-style-type: none"> Undertake a co-production and engagement exercise with people with lived experience, partners and providers to inform how we commission Review of existing quality monitoring arrangements ASCH Commissioning Intentions document being drafted. External consultant engaged to review existing commissioning arrangements, including a cost of care assessment. Care in the Home Services refresh completed bringing Supported Living Services under the Care in the Home Umbrella. Care and Support in the Home Services contract combining homecare and community based supporting independence services. Development of micro providers market with partner Community Catalysts. Quarterly contract management reviews take place including focus on performance against targets (engagement and set up). Daily risk assessment for people in the community awaiting packages of care and short term bed provision for those at high risk Engagement with Integrated Care Board around joint commissioning opportunities 	Mel Anthony Simon Mitchell Simon Mitchell Simon Mitchell Paul Stephen Paul Stephen Paula Parker Mark Albiston Richard Ellis	A -Accepted A -Accepted A -Accepted A -Accepted Control Control Control Control Control	30/05/2024 30/05/2024 30/05/2024 30/04/2024 	Medium 15 Major (5) Possible (3)

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<p>Recovery from the Covid-19 pandemic has added additional pressures, further threatening sustainability of the market. Latent demand and a reduction in access to health care has led to an increase in clients presenting with more complex needs. There is increased demand for care and support, and pressures arising from hospital discharges.</p>				<ul style="list-style-type: none"> • Adult Social Care Pressures Plan - outlining the strategic and operational response to a range of factors including, vacancies in the health and social care workforce, waiting lists for care and support, winter pressures and budgetary pressures. • Older Persons Accommodation Strategy refreshed, which analyses demand and need and sets the future vision and direction for accommodation to support vulnerable Kent residents alongside the Adult Social Care Strategy - Your Life, Your Wellbeing • Pipeline prioritisation tool is in place for Strategic Commissioning projects, shared with DivMT and Director of Strategy Policy, Relationships and Corporate Assurance • Analytics function utilises data to inform decision making before moving commissioning activity forward. • Analytical work is being conducted on assessments and reviews in adult social care to help inform key commissioning activity, including winter planning and impact of Covid. • Ongoing monitoring of Home Care market and market coverage. Commissioners and operational managers review the capacity of the Home Care market with a view to developing a strategy to ensure market coverage. • Ongoing Contract Monitoring, working in partnership with the Access to Resources team • Opportunities for joint commissioning and procurement in partnership with key agencies (i.e. Health) being regularly explored, including joint work regarding the provision of dementia nursing beds. • Quarterly market pressure reports to ASCH DMT 	<p>Richard Smith</p> <p>Richard Smith</p> <p>Chris Wimhurst</p> <p>Matthew Wagner</p> <p>Matthew Wagner</p> <p>Simon Mitchell</p> <p>Simon Mitchell</p> <p>Simon Mitchell</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"> Regular engagement with provider and trade organisations 	Simon Mitchell	Control		
			<ul style="list-style-type: none"> Analytics of the current market, and potential future market to ensure appropriate provision for regulated/unregulated care. Three sets of performance data to be triangulated (Analytic/Performance Data/Budget) 	Simon Mitchell	Control		
			<ul style="list-style-type: none"> KCC is part of local and regional Quality Surveillance Groups that systematically bring together the different parts of the health and care system to share information, identify and mitigate risks to quality, including those relating to care providers. 	Simon Mitchell	Control		
			<ul style="list-style-type: none"> New contracts commenced relating to Disability and Mental Health Residential Care services. 	Simon Mitchell	Control		
			<ul style="list-style-type: none"> Contract for Discharge Services presented to Cabinet Committee and approved by the Cabinet Member. 	Simon Mitchell	Control		
			<ul style="list-style-type: none"> Ensuring contracts have indexation clauses built-in, managed through contract monitoring 	Michael Bridger	Control		
			<ul style="list-style-type: none"> Continue to work innovatively with partners, including health services, districts and boroughs, and providers to identify any efficiencies across the wider sector. 	ASCH Divisional Directors	Control		

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Risk Ref	CRR0056	Risk Title and Event	Assigned To	Last Review da	Next Review			
		SEND Delivery Improvement and High Needs Funding shortfall	Sarah Hammond	02/04/2024	02/07/2024			
<p>Insufficient improvement in areas identified within Ofsted timescales and children with SEND do not meet sufficient progress within the available financial resource.</p> <p>Inability to manage within budget and reduce accumulated deficit on Dedicated Schools Grant reserve.</p>								
Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk	
<p>The Kent local area inspection by Ofsted and the CQC for children with SEND took place in January 2019. This inspection found nine significant areas of weakness across the local area which resulted in a Written Statement of Action being issued. In September 2022, the Local Area was revisited by Inspectors from both Ofsted and the CQC, who found that the area had not made sufficient progress in addressing any of the significant weaknesses. In March 2023 an Improvement Notice was issued to KCC. An Improvement Plan (Accelerated Progress Plan - APP) will be required to be formalised by the Local Area against which Outcome and Impact based KPIs will be scrutinised and addressed. In addition, there has been a significant increase in the number of children receiving Special Educational Needs</p>	<p>Adverse impact on outcomes for vulnerable young people.</p>	High		<ul style="list-style-type: none"> Delivery of SEND Improvement Programme, which includes delivery of requirements detailed in the Kent Accelerated Progress Plan. 	Sarah Hammond	A -Accepted Regular review	High	
	<p>Dissatisfaction from families.</p>	<p>Potential for legal action if statutory time limits or processes are not met.</p>	25 Major (5)		<ul style="list-style-type: none"> KCC has entered into a "Safety Valve" agreement with the Department for Education (DfE), enabling Kent County Council (KCC) to receive funding over a 5-year period to substantially fund the accumulated deficit on the Dedicated Schools Grant (DSG) High Needs Block (HNB). The agreement requires commitment to areas of review and improvement identified by Department for Education (DfE) to bring in year spend in line with the in-year budget by 2027/28. A financial contribution from the Council is also expected. 	John Betts	Control	16 Serious (4)
	<p>Continued funding of deficit on the DSG reserve by net surplus balances in other reserves becomes unsustainable, impacting on the financial resilience of the Council.</p> <p>Should the Secretary of State not be satisfied with the Council's progress at any stage, she may choose to invoke her statutory powers of intervention (s497A Education Act 1996) to direct the Council to take any further actions deemed necessary to secure the improvements required in SEND services.</p>		Very Likely (5)		<ul style="list-style-type: none"> Continual lobbying of Government on two matters; increased funding in both the short and medium term, and structural changes to government policy to help reduce the demand i.e. via County Council Network, Association of Directors of Children's Services. Includes provision of evidence of the impact of the High Needs pressures on the quality of education children receive, schools, other providers and the Local Authority. 	Roger Gough	Control	Likely (4)

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<p>and Disability support and the Council's Dedicated Schools Grant (DSG) budget is overspending on the High Needs Block.</p> <p>The Council is now part of the DfE Safety Valve programme and as part of this, will need to bring High Needs spending back into balance over the medium term and contribute to repaying the historic deficit. Corresponding pressure on some of KCC's non-DSG SEND related budgets e.g. SEN Home to School Transport, is also being experienced (CRR0057). Consequently, meeting the needs of children and young people with SEND within available resources is becoming ever more challenging. The ability to forecast costs in future years is difficult.</p>			<ul style="list-style-type: none"> • The Council has produced for approval by the Department for Education (DfE) and NHS England (NHSE) an Improvement Plan (Accelerated Progress Plan) to deliver appropriate and sustainable improvement, covering the areas identified in the Ofsted and CQC revisit report of 9 November 2022, as well as recommendations made by the Department. Sarah Hammond • Continual lobbying of Government on two matters; increased funding in both the short and medium term, and structural changes to government policy to help reduce the demand i.e. via County Council Network, Association of Directors of Children's Services. Includes provision of evidence of the impact of the High Needs pressures on the quality of education children receive, schools, other providers and the Local Authority. Sarah Hammond • Local area SEND Strategy developed in collaboration with partners, which goes beyond the Written Statement of Action to enable sustained improvement and transform Kent's SEND offer. Sarah Hammond • Robust programme management in place, ensuring appropriate alignment between project workstreams and overall programme delivery arrangements. Sarah Hammond • KCC SEND Transformation Strategic Board in place, with responsibility for coordinating activity and tracking improvement progress, reporting into the partnership Strategic Improvement and Assurance Board. Sarah Hammond • Kent and Medway Children and Young People's Programme Board joint governance mechanism with Health partners (sub-group of Integrated Care Board) Sarah Hammond 	<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">Independently chaired Strategic Improvement and Assurance Board established, including representation from the Local Authority (including Members and cross directorate colleagues), Health, Learning and Teaching settings, representatives of parents and carers, and where appropriate young people.	Sarah Hammond	Control		
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Risk Ref	CRR0063	Risk Title and Event	Assigned To	Last Review da	Next Review			
		Capacity to accommodate and care for Unaccompanied Asylum-Seeking (UAS) Children	Sarah Hammond	02/04/2024	02/07/2024			
<p>Insufficient resource (people and finances) to provide suitable social work assessment capacity, placements and support for UAS children in a timely fashion.</p> <p>Shortfall in funding the full cost associated with fulfilling the Council's statutory duties, particularly in relation to additional costs arising from the High Court Judgement.</p>								
Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk	
<p>In recent years, large numbers of unaccompanied children have arrived in the UK and claimed asylum. Because almost all of these children enter the UK in Kent, KCC is the local authority responsible for accommodating and looking after them in the first instance, in addition to those who already live in its area. Due to significant numbers of UAS children arrivals over a sustained period of time, and deficiencies in the operation and enforcement of the National Transfer Scheme (NTS), in September 2021 KCC and the Home Office agreed a protocol setting out how KCC would manage this situation in future. As a result of a recent High Court Judgement, this protocol can no longer be applied in its current form, meaning that the Council is required to accommodate and look after all UAS children arriving into the County, pending transfer</p>	<p>Impacts on vulnerable young people (both UAS children and potential knock-on impacts for Kent looked after children). Inability to fulfil statutory duties effectively. Significant additional budget pressures on the Authority, impacting on its financial resilience. Legal consequences. Reputational damage.</p>	<p>High 25 Major (5) Very Likely (5)</p>		<ul style="list-style-type: none"> Intensive negotiations taking place with Home Office and Department for Education on how to ensure suitable placements are provided for unaccompanied children, in line with our duties. 	Sarah Hammond	A -Accepted	29/06/2024	High 20 Serious (4)
				<ul style="list-style-type: none"> Commissioning of a new facility to operate as a safe care reception centre. 	Christy Holden	A -Accepted	29/06/2024	Very Likely (5)
				<ul style="list-style-type: none"> Representations made to Government for additional support to deal with UAS children costs. 	Roger Gough	Control		
				<ul style="list-style-type: none"> UAS child numbers are continually monitored and reviewed to assess capacity and aid planning 	Louise Fisher	Control		
				<ul style="list-style-type: none"> Best endeavours are being applied to ensure assessments are completed for every child that arrives in port and find appropriate placements, despite resourcing challenges. 	Louise Fisher	Control		
				<ul style="list-style-type: none"> Registering of reception centres with Ofsted to meet regulations coming into effect in autumn 2023. 	Louise Fisher	Control		
				<ul style="list-style-type: none"> The Council has utilised / re purposed available buildings to increase accommodation capacity in the short term. 	Rebecca Spore	Control		
				<ul style="list-style-type: none"> UAS Children Project Board in place to coordinate support efforts across the organisation. 	Sarah Hammond	Control		

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to other local authorities under the National Transfer Scheme. This presents numerous pressures on an already stretched service, and for the council as a whole.

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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	02/04/2024	02/07/2024		
<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 (MFTP).</p> <p>Members agree a budget requiring unrealistic and undeliverable efficiency savings leading to significant in year overspends. Statutory officers (S151, Monitoring Officer, Head of Paid Service) are required to use their powers to intervene or alert the Council to inappropriate/illegal decision making.</p>							
Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk
<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.</p> <p>In October 2023 the External Auditors issued a report on governance arrangements at the Council, which identified</p>	<p>Decisions challenged under judicial review on the appropriateness of the decision-making within KCC. Monitoring Officer / Head of Paid Service statutory report to Council. Reputational damage to the Council. S114 Notice issued by the S151 Officer.</p>	High		<ul style="list-style-type: none"> Review of KCC Informal Governance arrangements and Operating Standards Implementation of the actions identified within the 2022/23 Annual Governance Statement report 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 Governance reviews from across the Local Government sector are analysed to identify any lessons learned and reported to relevant stakeholders, including Governance & Audit Committee. Appropriate officer development and training programme in place and overseen by CMT Budget Recovery Strategy - Securing Kent's Future - set, to address the in-year and future years' financial pressures the council is facing and the specific and broader action that can be taken to return the council to financial sustainability. 	<p>Amanda Beer A -Accepted</p> <p>Benjamin Watts A -Accepted</p> <p>John Betts Control</p> <p>John Betts Control</p> <p>John Betts Control</p> <p>John Betts Control</p> <p>Paul Royel Control</p> <p>Roger Gough Control</p>	<p>31/07/2024</p> <p>30/06/2024</p>	<p>Medium</p> <p>10</p> <p>Major (5)</p> <p>Unlikely (2)</p>
		Likely (4)					

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<p>22 recommendations including around strategic arrangements for delivering priorities, effective challenge to and scrutiny of decisions and the Councils structure, systems and behaviours.</p>				<ul style="list-style-type: none"> • Appropriate performance reporting of service and corporate performance to Cabinet, Cabinet Committee and Full Council 	David Whittle	Control		
<p>The External Auditors referred to their October 2023 report in their Annual Report of 2022/23, raising a key recommendation in regard to significant weaknesses in arrangements for governance, and noted that the same recommendation had been made in 2021/22. This was supported by findings in the Monitoring Officers annual governance statement who has noted that improvements need to be made if governance is to be effective, in both the 2021/22 and 2022/23 reports.</p>				<ul style="list-style-type: none"> • 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. 	David Whittle	Control		
<p>The external auditor stated that that there have been areas of improvement during the year including workshops, review of written governance processes and a Member development survey, however they also concluded that the culture, behaviours and standards should also keep pace with improvement work.</p>				<ul style="list-style-type: none"> • 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. • Key and significant decision-making process in place for Executive decisions and appropriately published Forward Plan of Executive Decisions • Annual Governance Statement (AGS) arrangements in place with returns made across both senior and statutory officers • Democratic Services support effective Committee governance and scrutiny arrangements. • Member and Officer codes of conduct in place and robustly monitored and enforced • Member development and training programme in place and overseen by Selection and Member Services Committee • Completion of the activities required, including the review of the Constitution, to ensure that the Chief Executive Officer (CEO) has a fit for purpose support and governance structure (as agreed by the County Council) to continue the effective discharge of duties. 	David Whittle	Control		
					Benjamin Watts	Control		
					Benjamin Watts	Control		
					Benjamin Watts	Control		
					Benjamin Watts	Control		

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			<ul style="list-style-type: none"> • Following the publication of the 2021/22 AGS, a dedicated team was assembled within the Governance, Law and Democracy function to improve the awareness and application of governance and decision making across the council. 	Benjamin Watts	Control		
			<ul style="list-style-type: none"> • Provision for Chief Officers to seek written direction from Executive Members within the KCC Constitution 	Benjamin Watts	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	02/04/2024	02/07/2024		
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"> Data Protection and Information Governance training is mandatory and requires staff to refresh periodically. Progress rates monitored regularly. 	Control		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"> Investment in and implementation of new controls and technologies including capabilities of M365 E5 licenses. Cyber security threats are constantly evolving and therefore new tools and capabilities are required to keep up and mitigate the risk. 	Dave Lindsay Control		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"> Supply chain risk management program including keeping an inventory of all ICT suppliers and third party data transfers, cyber requirements built into procurement, regular assurance of supplier security to ISO 27001 and Cyber Essentials, and regular risk assessments carried out to identify supply chain risks. 	James Church Control		
Compromise of physical security controls and/or infrastructure including unauthorised access to data centres, network cables and natural disaster (flood, fires etc.)				<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 provider's 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"> 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"> Additional messages warning staff of cyber threats are being sent out regularly. 	Diane Christie	Control		
			<ul style="list-style-type: none"> Messages to encourage increased awareness of information security amongst staff are to be communicated to align with key implementation milestones of the ICT Transformation Programme. 	Diane Christie	Control		

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Risk Ref	Risk Title and Event	Assigned To	Last Review da	Next Review				
CRR0064	Risk of Failing to Deliver Effective Adult Social Care Services	Richard Smith		07/06/2024				
Impact on outcomes for people who draw on care and support and unpaid carers								
Potential that people will come to harm and the Council will be unable to ensure that their safeguarding statutory duty under S.42 of the Care Act 2014 will be fully met.								
Non-compliance with Care Act 2014, the Mental Health Act 1983, the Mental Capacity Act 2005 and associated legislation, and the regulatory requirements of the Care Quality Commission.								
Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk	
<p>The Council is at risk of failing to deliver effective Adult Social Care services and there is the potential to not meet requirements of statutory services under the Care Act 2014, the Mental Health Act 1983, the Mental Capacity Act 2005 and associated legislation, and the regulatory requirements of the Care Quality Commission.</p> <p>The Council has been impacted by:</p> <ul style="list-style-type: none"> - continual reduction in Central Government funding - Demographic changes - Increased demand for services - Demand led statutory services which can be difficult to predict - Increasing costs due to increasing complexity of health and social care needs. - Increasing costs due to cost of living 	<p>Failure to fulfil our duty of care could result in serious harm or detriment or in extremely rare cases death to a person with significant impact on families, carers and support networks. This could in turn result in prosecution, having to pay compensation and a negative impact on the reputation of the Council.</p> <p>Reputational impact. Public perception of the council being willing to accept poor standards of care. Low public confidence in social care</p> <p>A loss of trust in the Council's ability to safeguard people who live in Kent.</p> <p>Overspending on the budget which may impact the wider council.</p>	<p>High</p> <p>20</p> <p>Major (5)</p> <p>Likely (4)</p>		<ul style="list-style-type: none"> Phase three of the workforce deployment, review of team size, and composition in terms of skills to ensure we are achieving the full benefit of the restructure 	Mark Albiston	A -Accepted	30/04/2025	Medium
				<ul style="list-style-type: none"> Plans developed with HROD to ensure we maintain a highly skilled and effective workforce through specific recruitment and retention activity 	Mark Albiston	Control		15
				<ul style="list-style-type: none"> External consultancy analysis of the opportunities to work to prevent, delay, and reduce need for care and support to inform our preventative strategy 	Richard Smith	A -Accepted	31/07/2024	Major (5)
				<ul style="list-style-type: none"> Enhanced governance and assurance arrangements to increase oversight and control of issues relating to performance, finance and operational challenges. 	Mark Albiston	Control		Possible (3)
				<ul style="list-style-type: none"> Targeted plans to deliver sustainable adult social care budget <ul style="list-style-type: none"> Reprofilng of targets to deliver savings Phase 2 of the ASC restructure Activity and outcomes in terms of people and finance tracked to ensure all system work is concluded and any identified savings can be realised at the earliest opportunity. 	Mark Albiston	Control		

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Risk Ref	Risk Title and Event	Assigned To	Last Review da	Next Review
CRR0058	Capacity and capability of the workforce	Paul Royel	02/04/2024	02/07/2024
<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	
KCC is experiencing increasing demand for services due to whole system pressures which placing pressure on the existing capacity of the workforce.	Adverse impact on productivity	High		<ul style="list-style-type: none"> Review of pay strategy to ensure it remains competitive and sustainable for the future. Considering benefits of implementing exit and retention surveys to identify drivers for both leavers and for those who chose to stay 	Ian Allwright	A -Accepted	30/04/2025	Medium
	Negative impact on performance and / or delivery of statutory functions or services.	16 Serious (4) Likely (4)			Diane Christie	A -Accepted	30/06/2024	12 Serious (4) Possible (3)
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.	Lack of experienced staff with specialist skills			<ul style="list-style-type: none"> Targeted advice, support and interventions available via HR business partners for areas of particular recruitment / retention concern relating to key roles. Workforce planning and appropriate career development and succession planning mechanisms in place. 	Paul Royel	Control		
	Reliance on interim and agency staff potentially impacting stability of teams and consistency of service.				Paul Royel	Control		
Increasing complexity of issues being faced by KCC require capable and experienced officers with potentially different skill sets.	Inability to progress service development.			<ul style="list-style-type: none"> Delivery of the People Strategy for 2022 - 2027 approved by Personnel Committee KCC's Organisation Design principles set out and periodically refreshed and monitored to ensure they remain fit for purpose. 	Paul Royel	Control		
	Low staff morale and negative impact on wellbeing, potentially leading to burn out.				Paul Royel	Control		
The financial position of the Council limits the ability to manage in spikes operational	Loss of discretionary effort/goodwill.							

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<p>demand by way of recruitment.</p> <p>To support capacity, use of agency staff is increasing.</p> <p>Newly qualified professionals in services require adequate time and support from senior officers, which has secondary capacity impacts.</p> <p>Impacts of supporting secondments on teams and services with limited capacity or on difficult to resource roles.</p> <p>As well as national skills shortages in key areas, attracting suitably qualified, skilled and experienced staff, and retaining them to ensure sufficient capacity and capabilities to deliver services continues to be reported as a challenge across directorates. This is influenced by internal and external factors such as the financial position of the Council, local and national elections and the subsequent political uncertainty.</p>	<p>Impact on delivery of projects to expected time scales.</p> <p>Employer and Service Reputational damage</p> <p>Negative impact on budgets and savings plans</p>		<ul style="list-style-type: none"> • 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. • Communication, implementation and measurement of the impact of the People Strategy. • 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. • 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. • 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. • Promoting even more regular communications between managers and their teams while working remotely via "Good Conversations" tools etc. 	<p>Paul Royel</p> <p>Paul Royel</p> <p>Janet Hawkes</p> <p>Janet Hawkes</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>		
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			<ul style="list-style-type: none"> • 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. • Implementation of action plans arising from latest staff survey (conducted November 2023) 	<p>Kate Nowowiecki</p> <p>Corporate Management Team</p>	<p>Control</p> <p>Control</p>		

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Risk Ref	CRR0060	Risk Title and Event	Assigned To	Last Review da	Next Review		
		Unidentified RAAC in Schools and Corporate Estate	Rebecca Spore	02/04/2024	02/07/2024		
Unidentified RAAC could become unstable and lead to unsafe building/collapse without warning							
Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk
<p>RAAC is a lightweight form of precast concrete, frequently used in public sector buildings in the UK from the mid-1960s to at least the mid-1980s. It is mainly found in roofs, although occasionally in floors and walls. It is less durable than traditional concrete and there have been problems as a result, which could have significant safety consequences.</p> <p>RAAC is now life-expired and liable to collapse – this has already happened in 2018 in a school in Kent with no notice. Following the collapse in 2018 KCC commissioned a validation exercise of schools (excluding academies and voluntary aided schools) and the corporate landlord estate to identify RAAC. The exercise highlighted 12 schools with high potential for RAAC, following inspection and testing, 3 positive results for RAAC were found at 3 schools. KCC took adequate steps at the time to implement a strategy for remediation. In 2021 the Department for</p>	<p>More properties are identified as having RAAC meaning threat to delivery of critical services</p> <p>Capital/revenue costs of potential remediation work/temporary accommodation are not within agreed budgets</p> <p>Potential disruption to schools/service delivery while investigations are ongoing.</p> <p>Perception that previously inspected buildings are not safe when there is wider communication about the issue</p> <p>Potential loss of life if an incident occurs at a time when a building is occupied.</p>	<p>Medium</p> <p>15</p> <p>Major (5)</p> <p>Possible (3)</p>		<ul style="list-style-type: none"> Remainder of corporate landlord estate to be surveyed Joanne Taylor Care providers have been written to in regards to their contractual responsibilities for health and safety. Where providers identify RAAC they are to advise contract managers who are liaising with Health and Safety colleagues for advice and guidance Maria Kelly Health and Safety Team in place in advisory capacity to ensure compliance to Government and HSE and guidelines. Maria Kelly Senior surveyor has agreed to write to all landlords where KCC have staff or services in them. Joanne Taylor <p>In meantime, within the CLL RAAC survey, KCC have allowed to undertake inspections if we do not get the necessary assurance from the landlords.</p> <p>CLL RAAC surveys are expected to be completed by December 2023</p> <ul style="list-style-type: none"> Temporary remedial action is underway at the primary school where RAAC was identified . Joanne Taylor Ongoing engagement with the Department for Education (DfE) RAAC Team in order to obtain funding for remediation works. DfE have agreed to fund all capital expenditure in relation to remediation of RAAC in schools. Joanne Taylor Joint task group is in place with Education Joanne Taylor DfE have communicated to all schools regarding RAAC risk Joanne Taylor 	<p>A -Accepted</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>30/06/2024</p>	<p>Low</p> <p>5</p> <p>Major (5)</p> <p>Very Unlikely (1)</p>

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<p>Education published a guide for responsible bodies to help identify RAAC.</p> <p>Kent County Council (KCC), as the Local Authority, is responsible for the maintenance of Community and Voluntary Controlled school buildings in Kent. This responsibility is taken seriously, with continuous maintenance and modernisation programmes in place to ensure that the school estate is fit for purpose. Included within these programmes are routine building checks that identify possible future maintenance issues with accommodation.</p> <p>Recently another instance of RAAC has been identified at a KCC maintained primary school and as a result, KCC is re-surveying the school estate.</p> <p>Further information being made available to DfE over the Summer of 2023 regarding performance of RAAC material has led to the DfE changing the guidance previously issued earlier in 2023 and requiring complete closure of affected areas where it is present until mitigation works have been completed.</p>			<ul style="list-style-type: none"> • Review of the 2018/19 condition survey, Joanne Taylor • New condition surveys for schools and corporate landlord estate to identify potential RAAC Joanne Taylor • Kent Schools (Local Authority responsibility) written to in relation to and Diocesan schools and Academies written to in relation to their responsibilities. Joanne Taylor • Existing arrangements in schools via Hard FM contract for identification and reporting of building issues Joanne Taylor • Urgent Key Decision taken to authorise the necessary works (up to a cap) alongside the assurance processes. Joanne Taylor • Communications sent to all landlords where KCC have staff or services in them Rebecca Spore 	<p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p>		
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Risk Ref	Risk Title and Event	Assigned To	Last Review da	Next Review
CRR0061	CQC Assurance	Richard Smith	04/03/2024	04/06/2024
	Negative assurance report from CQC impacting the reputation of the Authority			
	Insufficient capacity and capability of available resource and funding within project and operational teams to deliver reform changes in required timescales.			
	Insufficient funding to support the reform and policy changes are unachievable.			
	Failure to embed the Kent Story into practice and delivery.			
	Person's voice is not reflected in decision making regarding their care			

Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk
<p>As part of the Health and Care Act 2022 the CQC have new regulatory powers to oversee the quality and performance of both Local Authorities and Integrated Care Systems (ICS) using as single assessment framework alongside the existing assurance assessment responsibilities they hold for providers of regulated activity.</p> <p>The CQC will apply the Local Authority Assurance Assessment framework and the reviews will focus on how well KCC is meeting its duties under Part One of the Care Act.</p> <p>The assessment framework will look at:</p> <ul style="list-style-type: none"> how KCC works with 	<p>The Health and Care Act 2022, introduces a new power for the Secretary of State to intervene when it is considered that a Local Authority is failing to meet its duties.</p> <p>Negatively impacting relationships with providers and partners - loss of confidence</p> <p>Unable to meet the requirements of 18 (3) of the Care Act 2014.</p> <p>Negative assurance report from CQC impacting the reputation of the Authority.</p> <p>Negatively impacting relationships with customers, carers and families - loss of confidence.</p> <p>Interdependencies between ASCH and CYPE could be impacted should the Regulator</p>	<p>Medium</p> <p>15</p> <p>Major (5)</p> <p>Possible (3)</p>		<ul style="list-style-type: none"> Communication and engagement plan under development to ensure effective engagement methods with all stakeholders prior, during and following assessment. Jade Shepherd Principal Social worker and CQC Assurance Lead attending all adults team meetings to discuss CQC assessment process and the opportunity to engage and support staff. Vicki Minkiewicz Weekly/Fortnightly Project Team meetings to review progress, risks and blockers for escalation to DMT Sydney Hill Engagement with CYPE to share lessons learned/best practice including a joint dashboard of activities which is continually reviewed to ensure it contains relevant and useful information Sydney Hill Continuation of improvement plan which references sustainability and integration, CQC assurance is embedded within ASCH business plan. Activities to improve ASCH sustainability also documented within SPR delivery plans for 2024/25. Sydney Hill CQC Steering Group in place Sydney Hill 	<p>A -Accepted</p> <p>A -Accepted</p> <p>Control</p> <p>Control</p> <p>Control</p> <p>Control</p>	<p>31/05/2024</p> <p>30/06/2024</p>	<p>Medium</p> <p>10</p> <p>Major (5)</p> <p>Unlikely (2)</p>

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<p>people</p> <ul style="list-style-type: none"> • how support is provided to people • how KCC ensures safety • the leadership across adult social care. <p>Formal assessments will start from December 2023 with the aim to undertake all local authority assessments within two years.. It is not known when the Kent formal assessment will be and a period of 9-11 weeks will be given. Following the Kent formal assessment, an overall rating will be given, and a rating for each quality statement will be provided. This will be supported by a summary of areas of improvement and strength.</p>	<p>issue a negative assurance report.</p> <p>A negative assurance report may impact the ability to recruit.</p>			<ul style="list-style-type: none"> • CQC Steering Group is in place. April 2024 meeting approved the terms of reference. Attendees from SRP, Commissioning, Public Health, Policy and Strengthening independence. The Group meets on a monthly basis. Sydney Hill • South East Region ADASS self-assessment is subject to ongoing review and is refreshed on a quarterly basis Sydney Hill • CMT and Cabinet Members have been engaged and briefed on ADASS self-assessment output Sydney Hill • Business case determining resource requirements to support CQC related activity agreed and funded through Strategic Reset programme Board for a one year fixed period. Sydney Hill • Regular progress report to DMT including any escalations Sydney Hill • Continuous improvement plan has been developed following self-assessment and is a live monitored document to support and prioritise improvement activity. Sydney Hill • Programme of training events including the 10 Core Skills Topics identified to support with the embedding of the Practice Framework to support practitioners to develop knowledge and skills as part of continuing professional development. Sarah Denson • KCC Safeguarding Competency Framework in place, including Mental Capacity Act requirements. Sarah Denson • Continued embedding of the Practice Framework and Quality Framework to drive improvements to 'be the best we can be' Sarah Denson 	<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"> • KCC is a statutory partner to the Kent & Medway Safeguarding Adults Board – a statutory service which exists to make sure that all partner agencies are working together to help and protect adults with care and support needs in the Kent and Medway area who may be experiencing, or are at risk of, abuse or neglect, and unable to protect themselves.. The Board has an independent Chair and its work carried out by a number of working groups. 	Sarah Denson	Control		
			<ul style="list-style-type: none"> • Test of Assurance Peer Review facilitated by Local Government Association has been signed off with a focus on three key areas of assurance. 	Jade Shepherd	Control		
			<ul style="list-style-type: none"> • Staff events facilitated by Local Government Association to support front line workers with example questions and responses from CQC assurance reviews. Themes from the workshops are to be factored into Self-assessment. 	Jade Shepherd	Control		
			<ul style="list-style-type: none"> • Communications and engagement plan for the ASCH workforce in place in regards to CQC assurance 	Jade Shepherd	Control		
			<ul style="list-style-type: none"> • Monthly highlight reports to SRPB providing updates on progress, risks, and challenges 	Jade Shepherd	Control		
			<ul style="list-style-type: none"> • An all staff event held with a focus on CQC assurance 	Richard Smith	Control		
			<ul style="list-style-type: none"> • Assurance Board is to receive and monitor all information and activity across the County pertaining to Quality, Performance and Culture to provide confidence in the consistency and approach of practice across locality teams. Finance will be a key theme that runs through all 3 key areas of 'Assurance' 	Richard Smith	Control		
			<ul style="list-style-type: none"> • Attendance at the South East region ADASS networking groups where information is shared from LGA, DHSC, and opportunities to share intelligence/best practise 	Richard Smith	Control		

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			<ul style="list-style-type: none"> • CQC assurance project forms part of the Strategic Reset Programme, projects within this programme are led by CMT, and are priority change projects which focus on the Council's most critical, complex and high-risk change programmes to support them to be delivered successfully 	Richard Smith	Control		
			<ul style="list-style-type: none"> • Ongoing focus on culture development across ASCH workforce 	Richard Smith	Control		
			<ul style="list-style-type: none"> • Adult Social Care Pressures Plan - outlining the strategic and operational response to a range of factors including COVID-19, vacancies in the health and social care workforce, waiting lists for care and support, winter pressures and budgetary pressures. 	Richard Smith	Control		
			<ul style="list-style-type: none"> • Transitions Panel with stakeholders from Childrens and Adult social care to be developed as the access point for all young people entering into adult services. Currently in place for East Kent and occurs bi monthly. Panels to be established in North and West Kent 	Susan Ashmore	Control		
			<ul style="list-style-type: none"> • Any relevant actions from Internal Audit audits on ASCH operational activities are shared with CQC project 	Debbie Chisman	Control		
			<ul style="list-style-type: none"> • Locality Commissioners meet regularly with Local Inspectors of the CQC. 	Simon Mitchell	Control		
			<ul style="list-style-type: none"> • Regular communication to the ASCH workforce on work in progress to support preparations for CQC assurance 	Vicki Minkiewicz	Control		
			<ul style="list-style-type: none"> • Regular engagement with Head of Finance (Policy, Planning & Strategy) and Revenue Manager. 	Michelle Goldsmith	Control		

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Risk Ref	Risk Title and Event	Assigned To	Last Review da	Next Review
CRR0039	Information Governance	Benjamin Watts	17/04/2024	02/07/2024
<p>Failure to embed the appropriate processes, procedures and behaviours to meet regulations. Failure to meet regulatory reporting deadlines. KCC is currently not meeting reporting requirements for FOI requests. 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. Cantium Business Solutions prioritises commercial work or does not undertake information governance compliance work in an appropriate and timely fashion. 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	
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 United Kingdom General Data Protection Regulations (UK GDPR) came into effect that have introduced significantly increased obligations on all data controllers, including the Council. The Covid-19 pandemic has introduced new risks e.g., staff adapting to new ways of working and increasing information security threats. There is insufficient resource	Information Commissioner's Office sanction (e.g., undertaking, assessment, improvement, enforcement or monetary penalty notice issued against the Authority). Serious breaches under UK GDPR could attract a fine of c£17m. Increased risk of litigation. Reputational damage. Bias presenting in AI algorithms impacting outcomes and decision making Loss of trust in automated decisions	Medium		<ul style="list-style-type: none"> Implementation of action identified within the 2023/24 consolidated annual governance action plan – Information Asset Owners assurance on data controls within the supply chain 	Benjamin Watts	A -Accepted	30/06/2024	Medium
		15		<ul style="list-style-type: none"> DPIA being drafted for use of Copilot across the organisation as a whole 	Hannah Rumball	A -Accepted	30/06/2024	9
		Significant (3)		<ul style="list-style-type: none"> 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 – Implementation of recommendations from Internal Audit of data mapping. 	Hannah Rumball	A -Accepted	30/06/2024	Significant (3)
		Very Likely (5)		<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. 	Dave Lindsay	Control		Possible (3)
				<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, and regular risk assessments carried out to identify supply chain risks. 	James Church	Control		

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<p>available to undertake comprehensive oversight / assurance activity that provides assurance on compliance with existing information governance standards.</p> <p>There is a critical dependency on the Council's Local Authority Trading Companies (CBS) and other material third parties to support Information Governance compliance for the KCC systems and network. KCC services' requirement for non-standard systems creates vulnerabilities.</p> <p>Failure to manage data lawful when using automated decision making via algorithms</p>			<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 • Senior Information Risk Owner for the Council appointed with training and support to undertake the role. • Caldicott Guardian appointed with training and support to undertake the role • Overarching policy for use of Artificial Intelligence is in place and has been communicated to the wider organisation • Staff are required to complete mandatory training on Information Governance and Data Protection and refresh their knowledge every two years as a minimum. • KCC are not meeting required deadlines for FOI returns. Paper to CMT regarding causes and requirements of services, • 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. • Implementation of recommendations from working from home and records management audits. • Management Guide/operating modules on Information Governance in place, highlighting key policies and procedures. 	<p>Peter Healey</p> <p>David Whittle</p> <p>Richard Smith</p> <p>Benjamin Watts</p> <p>Benjamin Watts</p> <p>Benjamin Watts</p> <p>Benjamin Watts</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>		
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			<ul style="list-style-type: none"> • 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 	Benjamin Watts	Control		
			<ul style="list-style-type: none"> • Privacy notices as well as procedures/protocols for investigating and reporting data breaches reviewed and updated 	Caroline Dodge	Control		
			<ul style="list-style-type: none"> • Information Resilience and Transparency team in place, providing business information governance support. 	Caroline Dodge	Control		
			<ul style="list-style-type: none"> • Cross Directorate Information Governance Working Group in place. 	Hannah Rumball	Control		

Risk Register - Corporate Risk Register

Risk Ref	Risk Title and Event	Assigned To	Last Review da	Next Review
CRR0049	Fraud and Error	John Betts	25/03/2024	25/06/2024

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:

- 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.

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.

Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk
<p>As with any organisation, there is an inherent risk of fraud and/or error that must be acknowledged and proactively managed.</p> <p>The fraud threat posed during emergency situations is higher than at other times, and all public bodies should be attuned to the risks facing their organisations and the public sector. This is further impacted by inflation and the cost-of-living crisis. It is critical that management implements a sound system of internal control and always demonstrates commitment to it, and that investment in fraud prevention and detection technology and resource is sufficient. This includes ensuring that new emerging fraud/error issues are sufficiently risk assessed.</p>	<p>Financial loss leading to pressures on budgets that may impact the provision of services to service users and residents.</p>	<p>Medium</p> <p>10</p> <p>Moderate (2)</p>		<ul style="list-style-type: none"> Guidance is available on the Finance Page on KNet to inform those who receive change of bank details on the agreed process and this is communicated to payment, commissioning and contract management teams across KCC. 	Control		<p>Low</p> <p>5</p> <p>Minor (1)</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>Very Likely (5)</p>		<ul style="list-style-type: none"> Process maps are in place to inform Control Mark Sage Team on the correct process to request a change of bank details. Training of staff involved in the updating of bank details is in place to inform them of the agreed process. Any queries received on missing payments from suppliers is cross checked against recent change of bank requests to alert a possible mandate fraud. Response Plan is in place within the Control Mark Sage Team to deal with any actual mandate frauds that have been identified. KCC is part of the Kent Intelligence Network (KIN), a joint project between 12 district councils, Medway Council, Kent Fire & Rescue and Kent County Council which analyses and data matches financial and personal information to allow fraudulent activity in locally administered services to be detected more proactively within Kent 	Control		<p>Very Likely (5)</p>

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			<ul style="list-style-type: none"> An agreed Memorandum of Understanding is in effect with partners (District Councils, Police and Fire Service) outlining the minimum standards expected to be applied by collection authorities (District Councils) to address fraud and error relating to council tax and business rates. Additional work jointly funded to identify and investigate high risk cases based on each authority's share of the tax base. This supports the work of the KIN. 	Dave Shipton	Control		
			<ul style="list-style-type: none"> Commissioning standards reviewed, including rules relating to "Spending the Council's Money", which have been clarified, to ensure relevant controls are in place to mitigate e.g. declarations of interest for procurement fraud, authorisation levels etc. 	Clare Maynard	Control		
			<ul style="list-style-type: none"> Communication of mandate fraud / cyber security to KCC supply chain. 	Clare Maynard	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. 	Jonathan Idle	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		

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			<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 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 Mandate fraud risks are communicated as part of the fraud awareness sessions. James Flannery 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 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		
				Control		
				Control		
				Control		
				Control		