Kent CC 06-February-2025

# Appendix 1 - Corporate Risks - Policy and Resources Committee



Risk Register - Corpo	orate Risk Register	Current Risk Level Summary Current Risk Level Changes	Green	0	Amber	<mark>3 R</mark> e 1	d _4 🎽	6 Tota 1	I9 _4≌	0 0	0	1 0 3 0 2 1 0 0 0 0 0 1
Risk Ref CRR0009	Risk Title and Event					Assigr	ned To	Last R	eview da	Next		
Future financial and ope	erating environment for Local Govern	ment				John B	etts	20/01/	2025	20/04	/202	5
	rowth pressures across services outstrip partners and service providers.	the Council's core spending pow	er, threater	ning the	financial							

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

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

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

Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk
The Government's Autumn Budget 2024 statement and subsequent Local Government Finance Settlement only covered 2025-26, with no indicative allocations for subsequent years, although there was a promise of multi-year settlements from 2026-27 onwards. This means that the forecasts for later years are speculative, consequently planning has to be sufficiently flexible to respond accordingly.	Unsustainable financial situation and potential drawdown from reserves, ultimately resulting in s114 notice. Failure to delivery statutory obligations and duties or achieve social value. Potential for partner or provider failure – including sufficiency gaps in provision. Reduction in resident satisfaction and reputational damage.	High 25 Major (5) Very Likely (5)		<ul> <li>Developing better scrutiny of spending bids John Betts A and more detailed savings plans, to improve the overall robustness of the budget setting process, thereby improving financial resilience.</li> <li>Processes in place for monitoring delivery of John Betts savings and challenging targets to bear down on future cost growth, as well as the budget as a whole.</li> <li>Quarterly budget meetings between Chief John Betts Executive and Corporate Director for Finance with Corporate Directors as relevant.</li> <li>Forecasts for future spending growth to be John Betts</li> </ul>		31/03/2025	Risk High 16 Serious (4) Likely (4)
2025-26 and the medium term to 2027-28 are likely to	Increased and unplanned pressure on resources.			revised as necessary once estimates become more certain and only finalised in controllable budgets once uncertainties have been resolved.			

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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			Regular "Star Chamber" budget reviews Jol involving the Chief Executive Officer, section 151 Officer and Corporate Directors to scrutinise progress against agreed budget savings. Robust budgeting and financial planning in Jol place via Medium Term Financial Planning (MTFP) process, including stakeholder consultation.	hn Betts hn Betts	Control	
funding to address spending pressures in social care will be baselined/continued for future years.				hn Betts	Control	
The level of savings required in 2025-26 and over the medium term continues to be higher			5	manda Beer	Control	
than in recent years, driven largely by growth in spending rather than cuts in funding, representing a new challenge. A significant financial risk for the Council is the continuing and increasing underlying		•		Roger Gough	Control	
deficit and accumulated debt on the High Needs Block of Dedicated Schools Grant (DSG).			5	Dave Shipton	Control	
An English Devolution White Paper was published at the			•	Dave Shipton	Control	
end of 2024, which signals significant changes to the operating environment for the local government sector.				David Whittle	Control	
				David Whittle	Control	
			5 5 5	Sarah ammond	Control	

KCC Quarterly Performance Report monitors key performance and activity information for KCC commissioned or delivered services. Regularly reported to Cabinet.	Matthew Wagner	Control
Ongoing monitoring and modelling of changes in supply and demand in order to inform strategies and service planning going forward.	Matthew Wagner	Control
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.	s Corporate Directors CD	Control
Assessing impact and responding to Government plans with the potential for significant financial implications for the Council, including adult and children's socia care, charges to waste collection arrangements etc.	Corporate Directors CD	Control

Risk Re	Risk Register - Corporate Risk Register						
Risk Ref	CRR0053	Risk Title and Event	Assigned To	Last Review da	Next Review		
Asset Ma	nagement and Degi	adation and associated impacts, linked to Capital Programme affordability	John Betts	09/01/2025	20/04/2025		

Impact on ability to meet operational requirements and/or statutory duties.

Increase in maintenance backlogs.

Emergency works on essential sites are prioritised to avoid serious health and safety incidents, with knock-on impacts for non-priority sites.

Cause Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk
Assets not being invested in sufficiently or adequately maintained now will require future additional spend to maintain with the possibility of reactive costs which may create a revenue pressure. Ongoing investment to maintain and modernise our assets competes with the priority to protect frontline services from effects of public sector funding restraint. The level of borrowing to fund the capital programme and the mpact on the revenue budget s significant. The uncertainty includes capital expenditure funded by grants, many of which are crucial to delivery of statutory services. There are a number of geo-political uncertainties in the current environment which	tive / 25 Major (5) Nasafe). Proving is sociated Pry duties school Not be nt standard d fit for ding mal pwing is s a result		<ul> <li>Papers to Secretary of State seeking approval to increase school financial thresholds</li> <li>10 year 24-34 capital programme published. Cath Hear 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.</li> <li>Lobbying of Government in relation to capital John Bett funding.</li> <li>Review of current policy of no new external borrowing agreed in principle with senior Members, with potential impact on the capital programme from 2026/27.</li> <li>Asset safety factors associated with our assets are given priority during the budget setting process.</li> <li>An annual programme of planned preventative maintenance is undertaken at KCC sites by the relevant Facilities Management contract partners</li> <li>Health and Safety Team in place in advisory Maria Kell capacity to ensure compliance with Government and HSE guidelines.</li> <li>Premises Officers in place to visit schools and support them with forecasting maintenance budgets.</li> </ul>	s Control S Control S Control	30/04/2025	High 16 Serious (4) Likely (4)

additionally impact on the financial and operating	The most urgent works will be completed on the agreed, prioritised sites.	Joanne Taylor	Control
environment. Current inflationary pressures are impacting on the capital programme significantly.	Infrastructure works with Assistant Education Directors to communicate to schools regarding their obligations for maintenance and their responsibilities for repairs under financial thresholds	Joanne Taylor	Control
Expectations of key stakeholders on capital spend.	External funding bid for 'schools rebuilding programme' (DfE) was submitted, and successful for Birchington Primary School.	Joanne Taylor	Control
Risks associated with changes in legislation related to developer contributions. This could lead to a requirement for significant forward funding.	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.	Rebecca Spore	Control
	<ul> <li>Lobbying central Government re capital grants relating to Highways.</li> </ul>	Haroona Chughtai	Control

Risk Ref C	CRR0059	Risk Title and Event	Assigned To	Last Review da	Next Review
Significant	failure to bring fo	recast budget overspend under control within budget level assumed	John Betts	20/01/2025	20/04/2025

Risk of significant adverse variance to the level of savings and income agreed in KCC's budget.

Spending growth pressures significantly exceeds forecasts.

Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk
Cause 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. The latest revenue forecast position for 2024-25 was an overspend of £23m (excluding schools), based on Q3 data. The most significant overspend in 2024-25 relates to adult social care. 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 financial resilience and viability.	The level of reserves as % of revenue and sustainability of reserves based on recent levels of drawdown put the council at the top of the lower quartile of county councils. Council reserves further depleted below a sustainable position. Impact on service delivery. More imminent danger of financial failure – ultimately issuing of s114 notice by Corporate Director Finance (s151 Officer). Negative impact on MTFP three year plan.	Risk High 25 Major (5) Very Likely (5)	Current Risk	<ul> <li>To maximise scope of effective scrutiny by all Members, there has been a review of meetings and agendas to ensure appropriate focus on core activity on the budget, key decisions and performance relating to "Securing Kent's Future", including regular finance update reports to Cabinet, Scrutiny Committee and Policy and Resources Committee.</li> <li>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.</li> <li>Section 151 Officer meeting weekly with the John Bett Leader, Deputy Leader (Cabinet Member for Finance), Chief Executive Officer and Monitoring Officer to provide progress updates.</li> <li>Finance and performance monitoring John Bett Cabinet meetings to ensure the focus on Securing Kent's Future remains until the council's financial position is stabilised.</li> <li>Budget monitoring will continue to include a John Bett</li> </ul>	Action A -Accepted Control Control Control	Target Date	
					s Control		
				Savings delivery plans and monitoring John Bett processes in place.	s Control		

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		• 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.	Control
		<ul> <li>Quarterly budget meetings between Cabinet John Betts Member and Finance and Corporate Directors</li> </ul>	Control
		• 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.	Control
		<ul> <li>Robust delivery plan information has been developed for 2024/25 – milestones, risks, dependencies etc, and will be reported to Strategic Reset Board.</li> </ul>	Control
		Regular SRP engagement with Directors Brett following approval of delivery plans in April Appleton 2024	Control
		Bi monthly presentation of delivery plan monitoring and exceptions to the SRP programme board	
		Analytics function used to undertake detailed Matthew analysis of the main areas of overspend. Wagner	Control
		• Equality Impact Assessment screening will be completed for any alternative and / or additional savings necessary under the recovery plan. Corporate Manageme nt Team	Control
		• Budget Recovery Plan - Securing Kent's Corporate Future - being developed to address in-year Manageme forecast overspend and outline a pathway to nt Team 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.	Control

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Risk Register - Corporate	e Risk Register			
Risk Ref CRR0014	Risk Title and Event	Assigned To	Last Review da	Next Review
Cyber & Information Security	/ Resilience	Lisa Gannon	13/12/2024	13/03/2025

Confidentiality, integrity and availability of data or systems is negatively impacted or compromised leading to loss of service, data breaches and other significant business interruptions.

Cause	Consequence	Current Risk	Previous Current Risk	Control / Action		Control / Action	Target Date	Target Risk
Malicious (intentional) actions against KCC from individuals, cyber criminals and state sponsored attacks. Supply chain compromise including third party data transfers, vulnerabilities in purchased equipment and supplier system breaches. 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. Compromise of physical security controls and/or infrastructure including unauthorised access to data centres, network cables and natural disaster (flood, fires etc.) Gaps in existing resources and capabilities, including technological controls and resource challenges in provider's operational teams.	Data Protection breach and consequent Information Commissioner's Office (ICO) sanction. Damages claims. Reputational Damage. Potential significant impact on business interruption if systems require shutdown until magnitude of issue is investigated. Loss or corruption of data. Loss of key systems potentially impacting ability to deliver statutory services. Partners unable to discharge their duties Complaints	High 20 Major (5) Likely (4)		<ul> <li>Reviewing visibility of CSG's risk profile regarding cyber security, to provide reassurance that the use of any shared resources or other inter dependencies from a cyber perspective are continually understood.</li> <li>Data Protection and Information GovernanceP training is mandatory and requires staff to refresh periodically. Progress rates monitored regularly.</li> <li>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.</li> <li>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.</li> <li>Frequent security audits, penetration tests and compliance submissions External review of security posture provides validation that our controls work and are being managed effectively.</li> </ul>	Church	A -Accepted Control Control Control	31/03/2025	High 20 Major (5) Likely (4)

Risk Register - Corporate Risk Register	
	<ul> <li>Multiple layers of logical, physical and administrative security controls</li> <li>Defence in depth is a key cyber security concept that the Authority adheres to, involving multiple layers of security control for protection from various threats.</li> </ul>
	Cyber standards and risk assessment have James Control been included into the central ICT Church commissioning framework
	<ul> <li>Internal assurance programme including James Control audits, risk assessment and vulnerability Church 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.</li> <li>Risk assessments completed on new implementations to ensure that cyber risks are highlighted and treated.</li> <li>Vulnerability management activities to identify and treat vulnerabilities in good time.</li> </ul>
	<ul> <li>Investment in and implementation of new controls and technologies including capabilities of M365 E5 licenses.</li> <li>Cyber security threats are constantly evolving and therefore new tools and capabilities are required to keep up and mitigate the risk.</li> </ul>
	Data Protection and Information Governance Benjamin training is mandatory and requires staff to Watts refresh periodically. Progress rates monitored regularly.
	<ul> <li>Additional messages warning staff of cyber Diane threats are being sent out regularly.</li> <li>Messages to encourage increased</li> <li>Diane Control</li> </ul>
	awareness of information security amongst Christie staff are to be communicated to align with key implementation milestones of the ICT Transformation Programme.

Risk Ref	CR	R0058	Risk Title and Event				Assigned To	Last Review da	Next Review
Capacity	and	capabilit	y of the workforce				Paul Royel	22/11/2024	22/02/2025
Workforce capacity challenges - insufficient staff to meet service demands.									
Capacity pressures within the management, and leadership teams potentially impacting time for reflection and decision making.									
Impact on	n bud	gets from	use of agency staff/contractors	to fill roles to support service of	delivery.				

There is a risk that services may not have the capacity to deal with the additional demand and associated cost pressures or may have to reduce quality to meet the need.

Complaints from Kent residents

Lack of depth / resilience of key personnel or teams.

Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk
KCC is experiencing increasing demand for services due to whole system pressures which placing pressure on the existing capacity of the workforce. 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. Increasing complexity of issues being faced by KCC require capable and experienced officers with potentially different skill sets. The financial position of the Council limits the ability to manage in spikes operational	Negative impact on performance and / or delivery of statutory functions or services. Lack of experienced staff with specialist skills Reliance on interim and agency staff potentially impacting stability of teams and consistency of service. Inability to progress service	High 16 Serious (4) Likely (4)		<ul> <li>Review of pay strategy to ensure it remains competitive and sustainable for the future.</li> <li>Exit and retention surveys in place to identify drivers for both leavers and for those who chose to stay</li> <li>Targeted advice, support and interventions Paul Roye available via HR business partners for areas of particular recruitment / retention concern relating to key roles.</li> <li>Workforce planning and appropriate career Paul Roye development and succession planning mechanisms in place.</li> <li>Delivery of the People Strategy for 2022 Paul Roye 2027 approved by Personnel Committee</li> <li>KCC's Organisation Design principles set Paul Roye out and periodically refreshed and monitored to ensure they remain fit for purpose.</li> </ul>	Control	31/03/2025	Medium 12 Serious (4) Possible (3)

demand by way of recruitment. To support capacity, use of agency staff is increasing. Newly qualified professionals in services require adequate time and support from senior	Impact on delivery of projects to expected time scales. Employer and Service Reputational damage		<ul> <li>Workforce profile report for the Personnel Committee gives detailed analysis on staffing levels and provides comparator information on previous years – now being provided more regularly to Personnel Committee for Member oversight and scrutiny.</li> <li>Communication, implementation and</li> </ul>	Paul Royel	Control	
officers, which has secondary capacity impacts.			measurement of the impact of the People Strategy.	Paul Royel	Control	
Impacts of supporting secondments on teams and services with limited capacity or on difficult to resource roles. As well as national skills shortages in key areas, attracting suitably qualified, skilled and experienced staff, and retaining them to ensure sufficient capacity and			<ul> <li>Delivery of the Change Support Hub to provide suite of tools, knowledge, models, videos and change related resources to support leaders, managers, staff, and project delivery teams. The aim of the Change Hul 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.</li> </ul>		Control	
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			• Delivery of Management Development activities to provide clarity and guidance for KCC managers on their responsibilities and accountabilities, including focus on key areas, such as digital, hybrid, equality, inclusiveness.	Janet Hawkes	Control	
Council, local and national elections and the subsequent political uncertainty.			<ul> <li>Regular staff survey conducted, followed by facilitation of engagement and action plans with senior management. Includes predictive analytics to explore key drivers of intention to leave to enable appropriate responses to develop.</li> </ul>	Diane Christie	Control	
			<ul> <li>Promoting even more regular communications between managers and their teams while working remotely via "Good Conversations" tools etc.</li> </ul>	Diane Christie	Control	

<u> </u>	<u> </u>		
		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.     Control	
		Implementation of action plans arising from Corporate latest staff survey (conducted November Manageme 2023)     Int Team	

Risk Ref CRR0045	Risk Title and Event	Assigned To	Last Review da	Next Review
Maintaining effective gover	nance and decision making in a challenging financial and operating environment.	Amanda Beer	05/02/2025	05/05/2025
	able to agree necessary policy (service) decisions within required timescales to deliver a legally able medium term financial plan (MTFP).			

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.

Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk
Cause 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. In October 2023 the External	Consequence 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.			<ul> <li>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</li> <li>Effective internal audit arrangements in place and robust monitoring arrangements for the delivery of internal audit recommendations to Governance &amp; Audit Committee</li> <li>Appropriately detailed and timely financial monitoring reports considered by Cabinet and Cabinet Committees</li> <li>Governance reviews from across the Local Government sector are analysed to identify any lessons learned and reported to relevant stakeholders, including Governance &amp; Audit Committee.</li> <li>Appropriate officer development and training Paul Royel programme in place and overseen by CMT</li> <li>Regular review of KCC Operating Standards Amanda and any necessary amendments are approved by CMT</li> </ul>	Action Control Control Control Control Control Control	Target Date	
In October 2023 the External Auditors issued a report on governance arrangements at the Council, which identified 22 recommendations including around strategic arrangements				<ul> <li>Budget Recovery Strategy - Securing Kent's Roger Future - set, to address the in-year and Gough 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.</li> </ul>	Control		

for delivering priorities,		Appropriate performance reporting of service	David	Control	
effective challenge to and		and corporate performance to Cabinet,	Whittle		
scrutiny of decisions and the		Cabinet Committee and Full Council			
Councils structure, systems					
and behaviours.		Appropriate and effective corporate risk	David	Control	
		management procedures in place for the	Whittle	Control	
The External Auditors referred		Council	Windle		
to their October 2023 report in			<b>-</b> · ·		
their Annual Report of 2022/23,		Operating standards for KCC officers that	David	Control	
raising a key recommendation		support KCC's constitution published on	Whittle		
in regard to significant		KNet, signposting officers to essential policy			
weaknesses in arrangements		information and additional guidance on			
for governance, and noted that		specific topics, to help officers discharge			
the same recommendation had		their responsibilities effectively.			
been made in 2021/22. This		<ul> <li>Informal governance arrangements</li> </ul>	David	Control	
was supported by findings in		authorised by the KCC Constitution have	Whittle	Control	
the Monitoring Officers annual		been published on KNet as a practical guide	Winde		
governance statement who has		for how officers work with elected Members			
noted that improvements need		to help them support effective decision			
to be made if governance is to		making for our service users, residents and			
be effective, in both the		communities.			
2021/22 and 2022/23 reports.		communities:			
		<ul> <li>Regular reporting to Governance &amp; Audit</li> </ul>	Benjamin	Control	
The external auditor stated that		Committee of implementation of the actions	Watts	-	
that there have been areas of		identified within Annual Governance			
improvement during the year		Statements, and actions raised at			
including workshops, review of		Governance and Audit Committee, in			
written governance processes		addition Members and key stakeholders			
and a Member development		have access to PowerBi suite which			
survey, however they also		captures all actions and progress to date.			
concluded that the culture,		1 1 5			
behaviours and standards		• Key and significant decision-making process	Benjamin	Control	
should also keep pace with		in place for Executive decisions and	Watts		
improvement work.		appropriately published Forward Plan of			
		Executive Decisions			
		Annual Governance Statement (AGS)	Benjamin	Control	
		arrangements in place with returns made	Watts	Control	
		across both senior and statutory officers	valis		
		5			
		Democratic Services support effective	Benjamin	Control	
		Committee governance and scrutiny	Watts		
		arrangements.			
		<ul> <li>Member and Officer codes of conduct in</li> </ul>	Benjamin	Control	
		place and robustly monitored and enforced	Watts		
		· ·			

	Member development and training programme in place and overseen by Selection and Member Services Committee	Benjamin Watts	Control
	<ul> <li>Completion of the activities required, including the review of the Constitution, to ensure that the Chief Executive Officer (CEO) has a fit for purpose support and governance structure (as agreed by the County Council) to continue the effective discharge of duties.</li> </ul>	Benjamin Watts	Control
	<ul> <li>Following the publication of the 2021/22 AGS, a dedicated team was assembled within the Governance, Law and Democracy function to improve the awareness and application of governance and decision making across the council.</li> </ul>	Benjamin Watts	Control
	<ul> <li>Provision for Chief Officers to seek written direction from Executive Members within the KCC Constitution</li> </ul>	Benjamin Watts	Control

# Risk Register - Corporate Risk Register Risk Ref CRR0039 Risk Title and Event Assigned To Last Review da Next Review Information Governance Benjamin Watts 16/12/2024 16/03/2025 Failure to embed the appropriate processes, procedures and behaviours to meet regulations. Vertical State Vertical State

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.

Providers and or suppliers processing KCC data fail to embed the appropriate processes and behaviours.

Poor data quality negatively impacts AI algorithms

Cause	Consequence	Current Risk	Previous Current Risk	Control / Action		Control / Action	Target Date	Target Risk
The Council is required to maintain the confidentiality, integrity and proper use, including disposal of data under the Data Protection Act 2018, which is particularly challenging given the volume of information handled by the	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. Increased risk of litigation.	Medium 15 Significant (3) Very Likely (5)		<ul> <li>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.</li> </ul>	James Church	Control		Medium 9 Significan (3) Possible (3)
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	Reputational damage. Bias presenting in AI algorithms impacting outcomes and decision making Loss of trust in automated decisions			<ul> <li>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</li> </ul>	Peter Healey	Control		
GDPR) came into effect that have introduced significantly ncreased obligations on all data controllers, including the				<ul> <li>Senior Information Risk Owner for the Council appointed with training and support to undertake the role.</li> </ul>	David Whittle	Control		
Council. The Covid-19 pandemic has				<ul> <li>Caldicott Guardian appointed with training and support to undertake the role</li> </ul>	Richard Smith	Control		
introduced new risks e.g., staff adapting to new ways of working and increasing				<ul> <li>Overarching policy for use of Artificial Intelligence is in place and has been communicated to the wider organisation</li> </ul>	Benjamin Watts	Control		
information security threats. There is insufficient resource available to undertake comprehensive oversight /				<ul> <li>Implementation of action identified within the 2023/24 consolidated annual governance action plan – Information Asset Owners assurance on data controls within the supply chain</li> </ul>	Benjamin Watts	Control		

Trisk Register - Corporate	T delt T de glietter	 				
assurance activity that provides assurance on compliance with existing information governance standards.			<ul> <li>Staff are required to complete mandatory training on Information Governance and Data Protection and refresh their knowledge every two years as a minimum.</li> </ul>	Benjamin Watts	Control	
There is a critical dependency on the Council's Local Authority Trading Companies			• KCC are not meeting required deadlines for FOI returns. Paper to CMT regarding causes and requirements of services,	Benjamin Watts	Control	
(CBS) and other material third parties to support Information Governance compliance for the KCC systems and network. KCC services' requirement for non-standard systems creates vulnerabilities. Failure to manage data lawful when using automated decision making via algorithms			• 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.	Benjamin Watts	Control	
			<ul> <li>Implementation of recommendations from working from home and records management audits.</li> </ul>	Benjamin Watts	Control	
			<ul> <li>Management Guide/operating modules on Information Governance in place, highlighting key policies and procedures.</li> </ul>	Benjamin Watts	Control	
			<ul> <li>Corporate Information Governance Group established, chaired by the DPO and including the SIRO and Caldecott Guardian acting as a point of escalation for information governance issues and further escalation to the Corporate Management Team if required</li> </ul>		Control	
			<ul> <li>Privacy notices as well as procedures/protocols for investigating and reporting data breaches reviewed and updated</li> </ul>	Caroline Dodge	Control	
			<ul> <li>Information Resilience and Transparency team in place, providing business information governance support.</li> </ul>	Caroline Dodge	Control	

The data capture mapping capture form is in Hannah Control place. Policy guidance requires Information Rumball Governance leads to review data maps with the services on a bi annual basis, or as and when a new DPIA is created reflected on the data map.	
Data Protection Impact Assessment (DPIA) Hannah Control is supported with a matrix detailing the type Rumball of data and its usage. KCC testing of Microsoft Copilot is moving into its second phase, and the DPIA remains a live document and will be updated accordingly.     Control	
Cross Directorate Information Governance Hannah Control     Working Group in place.	
ICT Commissioning function has necessary Sverre Control working/contractual relationship with the Sverreson Cantium Business Solutions to require support on KCC ICT compliance and audit.	

Risk Ref CRR0049 F	Risk Title and Event	Assigned To	Last Review da	Next Review
Fraud and Error		John Betts	20/01/2025	20/04/2025
<ul> <li>there are risks that:</li> <li>false representations made t</li> <li>failure to notify a change of c</li> </ul>	ficant acts of fraud or error from internal or external sources, in that within any process to make a gain or expose another to a loss circumstances to make a gain or expose another to a loss they are expected to safeguard to make a gain or expose another to a loss.	or activity		
	KCC, with a significant number of payments going to a wide range of suppliers and othe need to amend their bank details, that this process is used to submit a fraudulent chang n order to divert funds.	•		
Compromise of physical security	controls and/or infrastructure including unauthorised access to ICT systems could lead	d to		

fraudulent access and/or use of data.

Cause	Consequence	Current Risk	Previous Current Risk	Control / Action	Control / Action	Target Date	Target Risk
As with any organisation, there	Financial loss leading to	Medium		All tendering specification will include a     Clare	A -Accepted	31/03/2025	Low
is an inherent risk of fraud	pressures on budgets that may	10		requirement for the tenderer to provide Maynard			5
and/or error that must be	impact the provision of services to	Moderate		details on what procedures they have in			-
acknowledged and proactively	service users and residents.	(2)		place to prevent fraud from occurring within			Minor (1)
managed. KCC is a commissioning authority and	Benutational damage particularly	(2)		the contract, both in the service delivery and invoicing into KCC. Support in evaluating			
therefore need adequate	Reputational damage, particularly if the public see others gaining	Very Likely		these procedures will be obtained from the			Very Likely
controls in place to protect	services or money that are not	(5)		Counter Fraud Team as part of the overall			(5)
public money.	entitled to, leading to resentment	. ,		evaluation process.			
F	by the public against others.						
The fraud threat posed during				KCC is part of the Kent Intelligence Network Nick Scot	Control		
emergency situations is higher	Potential legal challenge.			(KIN), a joint project between 12 district			
than at other times, and all				councils, Medway Council, Kent Fire &			
public bodies should be	Reputational damage.			Rescue and Kent County Council which			
attuned to the risks facing their				analyses and data matches financial and			
organisations and the public	Poor service delivery.			personal information to allow fraudulent			
sector. This is further	Detentially enabling Serieus			activity in locally administered services to be detected more proactively within Kent			
impacted by inflation and the cost-of-living crisis.	Potentially enabling Serious Organised Crime.						
It is critical that management	Organised Chine.						
implements a sound system of							
internal control and always							
demonstrates commitment to it,	,						
and that investment in fraud							

Mak Negister - Corporate					
prevention and detection technology and resource is sufficient. This includes ensuring that new emerging fraud/error issues are sufficiently risk assessed. As part of the Economic Crime and Corporate Transparency Act (ECCT), a new corporate criminal offence of 'Failure to Prevent Fraud' has been		<ul> <li>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.</li> </ul>		Control	
introduced. The offence is intended to hold large organisations to account if they profit from fraud. Under the offence, large organisations		<ul> <li>Multiple layers of logical, physical and administrative security controls.</li> <li>Linked to CRR0014 Cyber Security Corporate Risk.</li> </ul>	James Church	Control	
may be held criminally liable where an employee, agent, subsidiary, or other "associated person", commits a fraud intending to benefit the		<ul> <li>KCC reserves the right to carry out a dip sample of due diligence vetting checks in partnership with contract managers to verify declarations of non-involvement.</li> </ul>	Clare Maynard	Control	
organisation.		<ul> <li>Scheme of Delegation - compliance with Delegation Matrix and Spending the Council's Money</li> </ul>	Clare Maynard	Control	
		<ul> <li>Procurement standards reviewed, including rules relating to "Spending the Council's Money", which have been clarified, to ensure relevant controls are in place to mitigate e.g. declarations of interest for procurement fraud, authorisation levels etc.</li> </ul>		Control	
		<ul> <li>Clear process within relevant Commissioning Departments for procurement under the PCR threshold</li> </ul>	Clare Maynard	Control	
		<ul> <li>With supplier consent, within the Tender Selection Questionnaire and subsequent contract Terms and Conditions.</li> </ul>	Clare Maynard	Control	
		<ul> <li>Communication of mandate fraud / cyber security to KCC supply chain.</li> </ul>	Clare Maynard	Control	
		• 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> <li>Mandatory training - Data Protection and Information Governance training is mandatory and requires staff to refresh periodically.</li> <li>Linked to CRR0014 Cyber Security</li> </ul>	Benjamin Watts	Control
	<ul> <li>Corporate Risk.</li> <li>Communication, including messaging to encourage increased awareness of information security amongst staff.</li> </ul>	Diane Christie	Control
	Linked to CRR0014 Cyber Security Corporate Risk.		
	<ul> <li>Whistleblowing Policy in place for the reporting of suspicions of fraud or financial irregularity</li> </ul>	James Flannery	Control
	<ul> <li>Training and awareness raising is conducted periodically and is included in the Counter-Fraud action plan.</li> </ul>	James Flannery	Control
	<ul> <li>Preventing Bribery Policy in place, presenting a clear and precise framework to understand and implement the arrangements required to comply with the Bribery Act 2010.</li> </ul>	James Flannery	Control
	<ul> <li>Anti-fraud and corruption strategy in place and reviewed annually</li> </ul>	James Flannery	Control
	<ul> <li>Counter Fraud Action plan in place to manage resources in conducting reactive and proactive work across KCC.</li> </ul>	James Flannery	Control
	<ul> <li>Participate in the National Fraud Initiative exercise every two years to identify any fraud and error within key risk areas.</li> </ul>	James Flannery	Control
	<ul> <li>KCC Counter Fraud &amp; Trading Standards are a member of the Kent Fraud Panel to help inform current fraud trends and emerging risks that may impact KCC and its residents.</li> </ul>	James Flannery	Control
	<ul> <li>Mandate fraud risks are communicated as part of the fraud awareness sessions.</li> </ul>	James Flannery	Control

• .			
		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.     Corporat Managem nt Team	e
		• The Corporate Management Team is Corporate required to engage the Counter Fraud Team Managem regarding all new policies, initiatives and nt Team 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.	e

Risk Ref CRR0065	Risk Title and Event			Assigned	d To I	Last Review d	a Next Revie	€W
mplementation of fit-for-purp	-			Simon Jo	nes		10/03/2025	5
Oracle Cloud system not fit-for-p	•							
Cause	Consequence	Current Risk	Previous Current Risk	Control / Action		Control / Action	Target Date	Target Risk
it significant inherent risk.	operational duties. 3.Costs to the Oracle Cloud programme will increase as resources to the programme extended. 4. Reputational impact to the Authority.	-		<ul> <li>Right skills in place to carry out User Acceptance Testing (UAT).</li> <li>Transition / change management planning to be completed.</li> <li>Programme Team to provide Internal communications with regular updates and key messages so that information is given in a timely matter.</li> <li>UAT phases - control points for sign off.</li> <li>Build &amp; Functional Test phases for each module built in to the programme with sign off required at end of each 'build' phase.</li> <li>Pre UAT &amp; Training schedule as part of the programme.</li> <li>Owner of control sits with the Service Implementation partner who sit outside of KCC.</li> <li>Agree date of 'change freeze' across all applications that interface with Oracle</li> <li>Cloud readiness assessment (with Service Leads) phase undertaken to map out current processes and how these will fit to the new system taking on board 'ADOPT not ADAPT'</li> <li>Oracle Cloud Board Members to ask their</li> </ul>	Amin	A -Accepted		Kisk Low 5 Major ({ Unlikel (1)
				respective areas to ensure that the programme is aware of any proposed changes to the current Oracle System or associated 3rd party systems to enable the programme to impact assess as otherwise it could result in additional costs.	Jones	Control		