# Audit Committee 27 January 2020

#### **CORPORATE RISK REGISTER – JANUARY 2020**

#### 1 Purpose

1.1 To brief the committee on the Corporate Risk Register.

#### 2 Recommendations/for decision

2.1 To review the Corporate Risk Register and associated actions and identify any issues for further consideration.

### 3 Corporate Risk Register - Supporting information

- 3.1 The Audit Committee has a role to monitor the effectiveness of risk management and internal control across the Council. As part of discharging this role the committee is asked to review the Corporate Risk Register.
- 3.2 The Corporate Risk Register provides evidence of a risk aware and risk managed organisation. It reflects the risks that are on the current radar for Strategic Board. Some of them are not dissimilar to those faced across other local authorities.
- 3.3 The risk register is reviewed regularly by Strategic Board and reported to the Audit Committee and Cabinet.

#### 4 Reasons for Recommendation

4.1 To allow members of the Audit Committee to review the Corporate Risk Register.

### 5 Resource implications

5.1 None

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# Corporate Risk Register Update

The Corporate Risk Register (CRR) shows the key risks to the Council and the actions that are being taken to respond to these risks. The risk register was last reviewed by Cabinet on 17 December 2019 and by the Audit Committee on 25 November 2019. The table below shows the changing risk profile over time.

	Total	Low	Moderate	High	Extreme	Not yet assessed
January 2020	20	2	12	4	2	-
November 2019	21	3	11	5	2	-
September 2019	22	3	10	7	2	-
July 2019	23	4	8	8	3	-
May 2019	23	4	8	9	2	-
March 2019	23	3	8	7	4	1
January 2019	23	3	8	7	4	1
October 2018	26	2	13	7	1	3

Since the CRR was last reported to Audit Committee in November 2019, the following risks have changed:

Risk Ref	Change	Comment
5) Inability to engage in & influence next round of growth including consideration of CaMKOx Corridor, HS2, housing need targets	Closed	The emerging Bucks Growth Board is taking this forward with clear direction from members. This is no longer something AVDC can engage with as a sovereign body.
9) Pembroke Road Redevelopment	Reduced	EA permits approved and build is progressing as planned.
programme is not delivered to time or	н→м	
budget		
10) Fail to manage and deliver major	Increased	New letting agents appointed to try and secure tenants in
capital projects on budget and to time -	$rac{1}{2}$ M	fourth F&B unit and commercial units on Long Lional.
The Exchange. Income and town centre		
regeneration objectives not achieved.		
13) Fail to deliver a sound Vale of	Increased	External influences may impact the ability to deliver by 31
Aylesbury Local Plan before the	$M \rightarrow H$	March 2020.
transition to new unitary council.		

There are **20 risks** on the corporate risk register. The residual risk rating is summarised as follows:

	Resid	lual Risk Rating	
Low risk	Moderate risk	High Risk	Extreme risk
2	12	4	2
2 22) Fraud, corruption, malpractice by internal or external threats. 23) Equalities is not considered in decisions resulting in Judicial Review and other litigation.	1) Fail to achieve the Medium Term Financial Plan. Annual sector budgets are not delivered  7) In-housing of Street and Horticulture service (Streetscene) is not completed by the end of the current contracts (January 2020), and in line with AVDC Council decision.  8) Depot Transformation Programme fails to deliver commercial, customer, H&S, Environmental objectives  9) Pembroke Road Redevelopment programme is not delivered to time or budget  10) Fail to manage and deliver major capital projects on budget and to time - The Exchange. Income and town centre regeneration objectives not achieved.  12) Aylesbury Vale Estates (AVE) does not deliver capital receipts and objectives of business plan.  15) Impact of BREXIT - financial (eg fuel costs), procurement, employment, regulatory, environmental, major projects//partnering arrangements  17) Health & Safety - Non-compliance with Fire and Health and Safety legislation. Failure to provide a safe place for staff and visitors on AVDC property and/or events.  18) Fail to plan for a major or large scale incident. Risk to safety of public & staff.  19) Business interruption affecting the Council's resources and its ability to deliver critical services.  20) Information Governance - A significant data breach, Inappropriate access, corruption or loss of data  21) Safeguarding arrangements, internal policies and processes are not adequate to address concerns about /protect vulnerable adults & children.	11) Decline in retail sector reduces ongoing viability of AVDCs Town Centre assets and limits success of regeneration programme  13) Fail to deliver a sound Vale of Aylesbury Local Plan before the transition to new unitary council.  14) Inadequate working with stakeholders to ensure safety of residential buildings following Grenfell.  16) Deterioration of quality of planning service delivery, decisions and timeliness of response to applications in the face of increasing growth demand; compounded by vacancies in the planning team, reliance on consultants and the national reduction in applicants; challenge locally due to job market and growth, unitary uncertainty	3) Loss of Snr Officers/Key staff (external or to Unitary programme) & inability to recruit high performing individuals.  4) Staff morale, mental, physical wellbeing deteriorates, increased demand on HR resource to support staff

## **Risk Scoring Methodology**

	5	Catastrophic	5	10	15	20	25
+	4	Major	4	8	12	16	20
Impact	3	Moderate	3	6	9	12	15
_ <b>_</b>	2	Minor	2	4	6	8	10
	1	Negligible	1	2	3	4	5
			Rare	Unlikely	Possible	Likely	Very Likely
Score		1	2	3	4	5	
					Likelihood	•	

1-3	Low	Acceptable risk; No further action or additional controls are required; Risk at this level should be monitored and reassessed at appropriate intervals
4 - 6	Moderate	A risk at this level may be acceptable; If not acceptable, existing controls should be monitored or adjusted; No further action or additional controls are required.
8 – 12	High	Not normally acceptable; Efforts should be made to reduce the risk, provided this is not disproportionate; Determine the need for improved control measures.
15 - 25	Extreme	Unacceptable; Immediate action must be taken to manage the risk; A number of control measures may be required.

Risk Rating - I	Likelihood
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	Likelihood	Likelihood Descriptors	Numerical likelihood
1	Rare	May occur only in exceptional circumstances	Less than 10%
2	Unlikely	Do not expect it to happen/recur but it is possible it may do so	Less than 25%
3	Possible	Might happen or recur occasionally	Less than 50%
4	Likely	Will probably happen/recur but it is not a persisting issue	50% or more
5	Very Likely	Will undoubtedly happen/recur, possibly frequently	75% or more

Capacity to Manage	Description
Full	All reasonable steps have been taken to mitigate the risk and are operating effectively. The cost / benefit considerations on implementing additional controls have been considered and no additional actions are proposed.
Substantial	There are sound arrangements to manage the risk with some scope for improvement. Arrangements have had a demonstrable impact in reducing either the likelihood or consequence of the risk.
Moderate	There are a number of areas for improvement in arrangements that would help to demonstrate effective and consistent management of the risk.
Limited	There are significant areas for improvement in arrangements that would help to demonstrate effective and consistent management of the risk.
None	There is a lack of clear arrangements in mitigation of the risk.

#### Risk Rating - Impact

Score	Descriptor	Compliance	Finance	Health and safety	Internal Control	Political	Reputational	Staffing & Culture
1	Negligible	No or minimal impact or breach of guidance/ statutory duty	Small loss risk of claim remote	Minor injury; Unlikely to result in sick leave	Control is in place with strong evidence to support	Parties work positively together with occasional differences; Members & executive work co-operatively	Rumours; Potential for public concern	Short-term low staffing level that temporarily reduces service quality (<1 day)
2	Minor	Breach of statutory legislation; Reduced performance rating	Loss of 0.1-0.25 per cent of budget; Claim less than £20k	Moderate injuries; Likely to result in 1-7 days sick leave	Control in place with tentative evidence	Parties have minor differences of opinion on key policies; Members and executive have minor issues	Local media coverage short term reduction in public confidence;	Low staffing level that reduces the service quality
3	Moderate	Single breach in statutory duty; Challenging external or internal recommendations or improvement notice	Loss of 0.25-0.5 per cent of budget; Claims £20k - £150k.	Major injuries; More than 7 days sick leave – notifiable to HSE	Control in place with no evidence to support	Members begin to be ineffective in role; Members and Executive at times do not work positively together	Local media coverage – long term reduction in public confidence	Late delivery of key objective/service due to the lack of staff; Low staff morale; Poor staff attendance for mandatory/key training
4	Major	Enforcement action; Multiple breaches of statutory duty; Improvement notices; Low performance ratings	Uncertain delivery of key objectives/loss of 0.5 – 1.0 percent of budget; Claims £150k to £1m	,	Partial control in place with no evidence	Members raise questions to officers over and above that amount tolerable; Strained relationships between Executive and Members	National media coverage with key directorates performing well below reasonable public expectation	Uncertain delivery of key objective/service due to lack of staff; Unsafe staffing level or competence; Loss of key staff; Very low staff morale; No staff attending training
5	Catastrophic	Multiple breaches in statutory duty; Prosecution; Complete system changes required; Zero performance against key priorities and targets	Non delivery of key objective/loss of >1 percent of budget	Multiple deaths; More than one Fatality	No control in place	Internal issues within parties which prevent collaborative working; Que from members shift resources away from corporate priorities	National media coverage, public confidence eroded; Member intervention/action	Non-delivery of key objective/service due to lack of staff; Ongoing unsafe staffing levels or competence; Loss of several key staff; Staff not attending training on ongoing basis

## **AVDC Corporate Risk Register**

Last re	view dat	te: 13 Janı	uary 2020

Last review date: 13 January 2020  Inherent Risk Rating  Residual Risk Rating														
Ref Risk Owner	Delegated Manager	Risk	Potential Consequences	Likelihood	rent Risk Ra Impact	Overall Risk Rating	Capacity to Manage Risk	Existing Controls & Mitigation	Likelihood	Impact	Overall Risk Rating	DoT (up = increasing risk)	Proposed Actions/Comment	Completion Date
1 Andrew Small	Strategic Board	Fail to achieve the Medium Term Financial Plan. Annual sector budgets are not delivered.	Failure to meet statutory obligations and business objectives; Pressure on budgets increase; Inefficient and ineffective use of resources; Poor publicity and reputation damage; Inability to meet the demands of the future and ensure continuous improvement of services.	4	5	20	Substantial	Longer term view, still maintain 4 years balanced budget, but working towards March 2020. Strategic Board monitoring the budget; regular reporting through Cabinet. Quarterly financial digest. Budget managers review cost centre reports.	2	3	6	Î	Forecasting to balance the budget for the 2019-20 financial year. However, a number of risks and issues have been identified and are being monitored and managed, incl:  Income shortfalls including Property, Planning, Garden Waste  Higher than budgeted costs of waste disposal (additional costs of £440k)  Offset by budget underspends and largely related to Corporate Financing items and Business rates Financial outlook is reviewed on an on-going basis to both reduce financial risks that may impact adversely on the financial forecast and to identify additional efficiencies.	Mar-20
2		Removed (Nov19) - combined with #3												
3 Andrew Small	Strategic Board	Loss of Snr Officers/Key staff (external or to Unitary programme) & inability to recruit high performing individuals.	Core service - deterioration in delivery due to loss of key staff & inability to recruit or retain high performing staff. Competing demands of Unitary programme impacts on capacity to deliver BAU. Projects - (capital, improvement, transformation) are delayed/cancelled; Financial cost of agency staff. Snr Management - capacity is stretched, lack of support to team members, lack of day-to-day direction/leadership	5	5	25	Moderate	Additional support to Leadership Team in place. Roles & responsibilities agreed across LT. Regular monitoring or leadership p and mgmt workloads.  Retention - various retention strategies in place and regular review of risk for "key posts".  Project prioritisation process concluded and ongoing review.  Employee Relations - Collaboration and healthy challenge with trade union and staff representatives and challenges addressed in partnership. New E'ee reps added to current group  Wellbeing -Outplacement scheme implemented. Coaching programme in place.  Use of contractors to cover permanent vacancies.  Staff communication, smooth handover, additional support to leadership team; Ongoing monitoring of KPIs and metrics		4	20	Î	Risk of AVDC snr staff leaving has increased following conclusion of Tier 3 recruitment, but oversight of BAU by BC CMT will increase. Change Freeze in operation, phased from 1 November.	Mar-20
4 Andrew Small	Strategic Board	Staff morale, mental, physical wellbeing deteriorates, increased demand on HR resource to support staff	increased sickness, Increase in staff stress levels; impact on service delivery	4	4	16	Moderate	Continued focus on Staff Comms. Increase in training spend, Staff Roadshows.  Continued focus on Wellbeing and Mental Health including external providers for support. regular review by ADs; opportunities for recognition, additional responsibilities etc	4	4	16	Î	Unitary demands are increasing. Staff grades 4 upwards increasingly involved. T3 recruitment concluded with no appointments from AVDC. AD's facing uncertainty around future roles. Mapping for teams in progress and will provide clarity for day1. TUPE consultation in progress, paydate move; increasing volume of change being felt.	Mar-20
5 Andrew Small	Will Rysdale	Lack of clarity and/or political engagement with partners hinders ability to engage in & influence next round of growth including consideration of CaMKOx Corridor, HS2, housing need targets. A Bucks wide plan could result in even more housing in the Vale geography.	Lack of engagement in planning issues impacting the Vale geography; expose district to "planning by appeal"; developer challenge; Government sanctions; lack of ability to secure strategic infrastructure; additional housing growth absorbed by Aylesbury Vale.	4	4	16	Moderate	AVDC interests represented in the Bucks Growth Board rather than separately as AVDC.			Closed		The emerging Bucks Growth Board is taking this forward with clear direction from members. This is no longer something AVDC can engage with as a sovereign body.	Jan-20
6		CLOSED (Nov19) - Failure to deliver the Connected Knowledge Strategy									Closed			
7 Andrew Small	Will Rysdale	Inhousing of Street and Horticulture service (Streetscene) is not completed by the end of the	Failure to deliver services, financial costs, damage to AVDC reputation.	3	3	9	Substantial	Full Council approval, Project Manager, Operations Board for oversight & governance, budget approved, Project plan developed and work has commenced.	2	3	6	$\rightarrow$	Project on track and progressing well towards go-live date on 21 January. Key Manager is not transferring over so external recruitment has commenced. Considering options for interim arrangements.	Jan-20
8 Andrew Small	Will Rysdale	Waste & Operations Transformation Programme fails to deliver commercial, customer, H&S, Environmental objectives.	Inability to deliver services to public; death or injury to public or staff; regulatory fines; criminal prosecution or civil litigation; reputational damage; financial cost; inability to expand services and generate commercial income.	3	5	15	Moderate	Successfully achieved Competent Management System (CMS) (Sept 19) ensures compliance with EA licence requirements; Programme of works to March 2020 mapped out. Dedicated programme manager. Monthly Programme Board oversight; quarterly updates to Strategic Board	2	3	6	<b></b>	Recruitment for Commercial Workshop Manager approved and live (Jan20). Business plan for Workshop being developed including new opportunities for BC and will assess ROI for new Authority (Feb20).	Feb-20
9 Andrew Small	Teresa Lane	Pembroke Road Redevelopment programme is not delivered to time or budget	Delay to the scheme, and potential to fail to deliver part/all of scheme. This would allow us to maintain our current service provision but could cause a reduction of service linked to the level of growth in the district. Costs exceed budget; inability to expand services; damage relationships with future/existing tenants; Reputation damage	3	5	15	Substantial	External specialist consultant and programme manager recruited to help assess appropriate mitigation measures. Updated FPP plans approved by EA Nov19.  Major Capital Projects Member group – Highlight reports, challenge from legal, finance and risk; Project teams with external contractors in place with established governance processes. Governance processes strengthened between Operations and Capital Projects to ensure alignment	2	3	6	<b>↓</b>	Build is progressing as planned.	Oct-20
10 Andrew Small	Teresa Lane	Fail to manage and deliver major capital projects on budget and to time - The Exchange. Income and town centre regeneration objectives not achieved.	Costs exceed budget; damage relationships with future/existing tenants; Reputation damage; impact on wider Town Centre Regeneration programme and ability to enhance existing assets.	3	3	9	Substantial	Major Capital Projects Member group – Highlight reports, challenge from legal, finance and risk; Project teams with external contractors in place with established governance processes.	2	3	6		Exchange opened 8 March. 3/4 of the F&B units have been let with interest in fourth. Appointed new lettings agent and early indications more positive post general election. Commercial units still to be let on Long Lional. Financial impact (2019/20) being monitored through budget pressures	Ongoing

				Inherent Risk Rating							ating	DeT (	
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11	Andrew Small Teresa Lane	Decline in retail sector reduces ongoing viability of AVDCs Town Centre assets and limits success of regeneration programme	Decline in town centre investment, vacant property, reduced return on investment, increasing unemployment, reduction in business rates income.	4	4	16	Moderate	AVDC investment in The Exchange has delivered new public space, restaurants, businesses, helping to change the town centre offer. Aylesbury Town Centre plan and regeneration programme; joint Officer Steering Group (AVDC, BCC, ATC) monitors progress against action plan and receives ned ideas/challenges. AGT Board and Project Team is overseeing & reviewing the masterplan for the Garden Town which includes the town centre.	3	3	9	AGT Masterplan will provide further opportun for funding and progress with small and major AVDC&BCC mtg to discuss future strategy for Centre.  Kingsbury & Markey Sq public space procurem underway. PR architects due to be appointed	projects. Ayl Town Ongoing ent
12	Andrew Small Teresa Lane		Inability to achieve expected distribution from the partnerships and grow AVDC's investments; security of loans. Satisfaction/relationship with existing customers/community deteriorates; Reputational damage to Council and Members if high profile ventures fail; negative impact of "commercial" decisions on Council's wider strategic & community objectives.	4	4	16	Moderate	Internal audit review of AVE governance arrangements (Jan19). Partnership Agreement in place, business plan process in place and plan subject to scrutiny and cabinet approval. AVDC representatives on AVE abreast of issues. On-going monitoring and monthly meetings taking place. Asset Managers have been directly advised of performance concerns.	3	2	6	Market uncertainty may place dividend at risk to monitor	Continue Mar-20
13	Andrew Small Will Rysdale	Fail to deliver a sound Vale of Aylesbury Local Plan before the transition to new unitary council.	Opportunistic planning applications; Loss of local control; Government send in own planning team; Loss of New Homes Bonus.	3	3	9	Moderate	VALP approved by Council. Consultation on main modifications commenced Nov 19. Project manager in place. Weekly action plans and progress monitoring. Regular engagement and communication with CLG to discuss timeframes. Early engagement of QC. Support from the Planning Officers Society; Advice from Planning Inspectorate; Working with the Bucks Planning Officers Group.	3	3	9	External influences may impact the ability to on 31 March 2020.	eliver by Mar-20
14	Andrew Small Membery	Inadequate working with "responsible parties" to ensure safety of residential buildings following Grenfell. There is potential for financial cost to the Council if management company folds leaving Council to do works in default.	Death or injury to public; loss of public trust; damage to reputation; Financial cost	3	5	15	Substantial	Liaising with MHCLG and Bucks Fire & Rescue; working with leaseholder and housing association	3	4	12	Friars House in Aylesbury is over 18 meters ta fitted with ACM cladding. Improvement notice has been issued (Jan20), appealed. Engagement with MHCLG for financial support default is required.	out may be Ongoing
15	Andrew Small Hassall	Impact of BREXIT - financial (eg fuel costs), procurement, employment, regulatory, environmental, major projects/partnering arrangements	Impacts all areas of Council activities	4	4	16	Substantial	Detail risk register and action plan, working group monitoring	2	2	4	Brexit deadline now 31 Jan2020. Planning for 'Brexit ongoing, inline with MHCLG guidance. Ewith BCC and LRF. Continue to monitor Brexit	ngaged Ongoing
16	Jeff Membery Hazel Hutt	Deterioration of quality of planning service delivery, decisions and timeliness of response to applications in the face of increasing growth demand; complex policy position, compounded by vacancies in the planning team, reliance on consultants and the national reduction in applicants; challenge locally due to job market and growth, unitary uncertainty		4	4	16	Moderate	Planning Improvement Board in place (Aug19); Use of external providers to reduce backlog; Planning Advisory Authority workshop and review; customer journey analysis, member case load, planning updates & communications etc., range of recruitment strategies	3	4	12	Planning Improvement Programme results so - increase against Government Targets from 7 worst performing area in Sept 2019 to a position the end of Nov.  - reduction in outstanding complaints from over Sept 2019 to 10 by the end of Nov.  - Reduced the backlog of older cases from 296 Sept 2019 to 248 by mid Dec 2019  - over 100 older cases allocated to external probe cleared in the next three months	ove 80% by  er 60 in  Mar-20 in

				Inherent Risk Rating						Residual Risk Rating				
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Corporate compliance/safety risks:														
17 Andrew Smal	Kate Mulhearn	Health & Safety - Non compliance with Fire and Health and Safety legislation. Failure to provide a safe place for staff and visitors on AVDC property	Death or injury to public or staff; criminal prosecution or civil litigation; Service stopped; Loss of public trust; Action by Health and Safety Executive or Bucks Fire and rescue, e.g. fine up to £4m, corporate manslaughter charges; Insurance claims/ financial loss	2	4	8	Moderate	Full H&S team in place. Revised H&S policy & strategy approved Sept 17.  Fire Risk Assessments performed for all property (Feb19). Asbestos/Legionella policies updated 2019. Strategic Health and Safety Board monitor risk and performance. H&S Committee meets every 3 months. Management of contractors procedure in place and training provided. New M&E service provider selected (Apr18) which will see a more uniformed and monitored approach to pre-planned maintenance and reactive work New lone working devices and 3 year contract purchased.	2	3	6	<b>—</b>	Continuous monitoring.	
18 Andrew Smal	l Will Rysdale	Fail to plan for a major or large scale incident (accident, natural hazard, riot or act of terrorism). Risk to safety of public & staff	Public safety. Service delivery disruption and impact on the Council's ability to deliver critical services. Reputational damage to the council.	2	4	8	Moderate	Community Safety Manager appointed (Apr17 ) with responsibility for Emergency Plan and Community Resilience.  Table top exercise run Dec2018.  Public Events Management steering group set up & Duty holders established. Security contract in place and Silver command. Events Safety Management Framework agreed to ensure consistent approach and accountability. Crowd Safety Management consultancy review.  Resilience workshop with Local Resilience Forum to focus on long term response planning. Thames Valley Local Resilience Plan in place, with AVDC representation at District level.	2	3	6	$\rightarrow$	Event safety plans for each event need to reflect increasing popularity of ADVC events and growth in crowd numbers.	
19 Andrew Smal	Kate	loss of IT due to failure or cyber attack	Service delivery disruption and impact on the Council's ability to deliver critical services. Reputational damage to the council.	2	4	8	Moderate	EP & BC Steering Group established to ensure coordination. Increased use of cloud technology, less paper documents.	2	3	6	$\Rightarrow$	All the BCPs being reviewed and updated to ensure fit for purpose. Work is aligning with Unitary work streams.	
20 Andrew Smal	Kate   Mulhearn	legislation, a significant data breach, Inappropriate	Exposure of confidential information or corruption of data; Prosecution or fine for statutory breach; Loss of public trust	3	4	12	Substantial	Data Governance Officer with responsibility for DP and info governance. IGG monitors specific risks and has its own action plan. Information Management Strategy has been revised inline with GDPR. Mandatory training; Investigations into data breaches. Periodic data sweep. HB Law supporting. Information Asset Registers, identified Information Asset Owners, retention schedules in place. Privacy Impact Assessments for all projects. Dual factor sign in.	2	3	6	$\rightarrow$	Ongoing monitoring.  No further work will be done on Policy Review as this all now falls under Unitary workstreams.  Customer Data processes project in progress to address system issues and cleanse data prior to unitary	
21 Andrew Smal	l Will Rysdale	adults & children who may be at risk of significant harm. Requirements of "Prevent" are not implemented and applied. Internal processes and controls are inadequate to effectively prevent dangerous individuals from gaining access to opportunities where that may place vulnerable	Failure to refer concerns to the appropriate agency for investigation; Damage to reputation; Harm to vulnerable adult or child as a result of failure to refer. Reputational damage to the council should perpetrator of terrorism be living or radicalised within the borough. A known sex offender is not prevented from having access to vulnerable adults and children.	2	4	8	Moderate	Internal AVDC safeguarding board with membership across all sectors. Mandatory training rolled out to all staff. Use self reporting template/ RAG framework (S11); Meeting with Chair of Bucks safeguarding board – questions asked about current safeguarding arrangement and recommendations made; AVDC Chairs Community Safety Partnership (Prevent). Check applications for taxi licenses with disclosure Scotland. Whistleblowing policy in place and Managing volunteers policy in place.  Members training on Prevent (WRAP) (Oct17). Internal audit (May17). Member training on Safeguarding 2018.	2	3	6	<b></b>	Training needs assessment for different roles is complete. Training for level 2,3,4, booked in. With onset of winter, implement severe weather emergency protocol actions for Housing/Homelessness.	
22 Andrew Smal	IMIIIhearn	malpractice or error, by internal or external threats.		2	3	6	Substantial	Compliance team focus on CT liability, Housing Benefit, Tax Reduction entitlement, exemptions and discounts. New Fin Regs & Procedures update financial controls. Internal audit reviews and oversight of fraud action plan. Fraud Awareness session provided at Manager Training.	1	3	3	$\rightarrow$	Fraud risk assessment undertaken as part of 2019/20 internal audit plan	
23 Andrew Smal	Will Rysdale	Equalities - Decisions taken by the Council do not consider equalities resulting in Judicial Review and	Reputational risk to the authority and inability to progress with strategic objectives of the organisation; potential cost to the Council if decisions made against the authority.	2	3	6		Equalities steering group. Equality Impact Assessments performed. Annual Equalities report to Cabinet Jan18Post restructure, AVDC profile has been reviewed and is broadly consistent.	1	2	2	$\Rightarrow$		