

## Strategic Risk Register

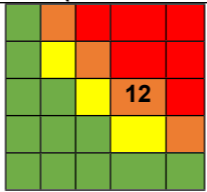
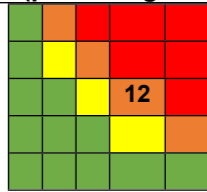
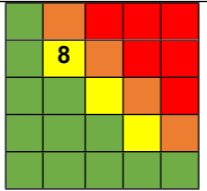
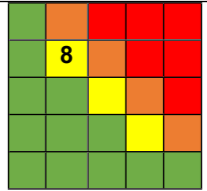
This register details the strategic risks faced by Crawley Borough Council in relation to achieving its priorities and includes the mitigation action being taken to control these risks. The register is owned by the Chief Executive and Corporate Management Team and is updated regularly.

Below is the matrix we use when scoring risk for any project or activity. We have also considered the risk appetite, based on guidance included in the Orange Book – Management of Risk, Principles and Concepts (2020)

Impact/ Consequence	Likelihood				
	1	2	3	4	5
	Rare	Unlikely	Possible	Likely	Almost certain
5 Catastrophic	5	10	15	20	25
4 Major	4	8	12	16	20
3 Moderate	3	6	9	12	15
2 Minor	2	4	6	8	10
1 Negligible	1	2	3	4	5

Risk Appetite	Description
Opposed	Avoidance of risk and uncertainty is key objective
Minimalist	Preference for safe options that have a low degree of inherent risk
Cautious	Preference for safe options that have a low degree of residual risk
Mindful	Willing to consider all options and choose one that is most likely to result in successful delivery
Enterprise	Eager to be innovative and to choose options that suspend previous held assumptions and accept greater uncertainty

Risk score = Impact x likelihood

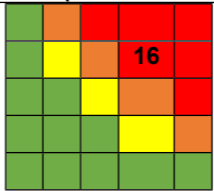
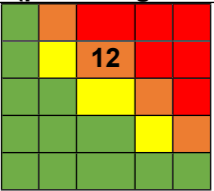
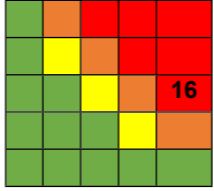
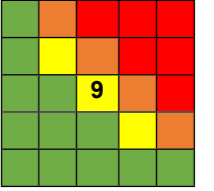
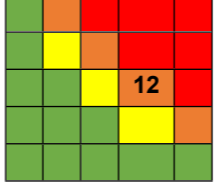
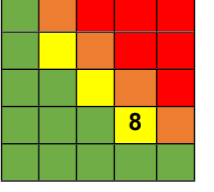
Risk ID	Risk Title	Risk Description	CMT Owner	Risk score (no controls)	Mitigations	Risk score (post mitigation)	Risk Appetite
1.	New Town Hall	PC was achieved on 25 October and mobilisation to the new building completed in March. Focus is now on settling the final account, defects and commercial floor lettings. Westrock and Kier have reached agreement on settling the final account and are progressing the associated settlement agreement.	Deputy Chief Executive		Mechanisms within the contract are being used to address delay and cost concerns. Significant effort was taken to ensure these were robust before entering the contract. Professional advice being taken throughout, and communication with key stakeholders being maintained. Defects have been high in number but significant focus to address these are being closed out. The Council has completed the agreement for lease with its first tenant who is due to commence occupation later in 2023. A London-based commercial agent has also been appointed to capture companies wishing to move out of the capital. With the project in its final stages and with these mitigations in place for some time and with no further mitigations possible, the post risk score remains the same.		Mindful
2.	District Heat Network	The District Heat Network Phase 1 has reached practical completion and has been handed over. The key risks moving forward therefore relate to the ongoing operation, maintenance, and billing. The inflationary context in particular creates a pricing risk, attempting to ensure value for residents whilst achieving the required return. There is significant reputational risk in ensuring this balance is correct.	Head of Major Projects & Commercial Services		The operation, maintenance and billing has already been contracted out to a specialist, and the onboarding went very well. Two rounds of price setting have been undertaken, which seems to demonstrate that the DHN is able to balance value with return. However, the risk score remains consistent post mitigation given that volatility in energy prices.  Internal Audit completed a review of the DHN in Q4 2022/23 and assessed it as 'substantial assurance'		Mindful

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3.	LEP Infrastructure – Crawley Growth Programme	<p>Risk of failure to deliver the Crawley Growth Programme due to:</p> <ul style="list-style-type: none"> <li>Budget overspend for the future project delivery within the Programme and scheme delivery time overruns.</li> <li>Discontinuation or withdrawal of support from key partners.</li> <li>A sustained period of economic downturn which slows up private sector investment on key regeneration sites in the town centre.</li> <li>Ineffective co-ordination of delivery across projects, leading to multiple disruption in the town centre and Manor Royal when this was avoidable.</li> </ul>	Head of Economy & Planning		<p>Regular financial monitoring and audit work carried out, including quarterly updates to CPAG. The Head of Corporate Finance regularly attends Programme Delivery Team or Crawley Growth Board meetings with West Sussex County Council.</p> <p>A mid-term programme review was undertaken in Q3 2022 to agree a way forward and delivery programme for the remaining projects. The agreed funding protocol between CBC and WSCC is being updated to reflect that outcome of the review and new opportunities arising to add more government funding to the Crawley Growth programme.</p> <p>Regular project monitoring undertaken by individual Project Boards, the Programme Delivery team with West Sussex County Council and reported to the Crawley Growth Board, chaired by the CBC Chief Executive.</p> <p>Regular interaction to identify and resolve issues promptly at project Board level with the Manor Royal Business District, Network Rail, GTR, Metrobus etc.</p> <p>The target date for delivery of regeneration site outcomes is 2030 to take account of the economic cycle and potential for a sustained downturn, which has been exacerbated by the impact of the COVID-19 crisis nationally and internationally.</p> <p>Careful planning and close cooperation between CBC, WSCC officers and third-party partners / contractors. All partners within the Crawley Growth Programme follow a Communications protocol to ensure effective coordination and communications around project delivery.</p>		Mindful

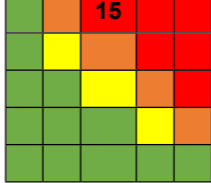
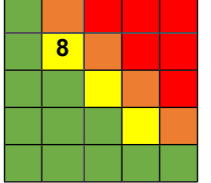
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4.	Delivering the Affordable Housing Programme	<p>The recent water neutrality position statement issued by Natural England has both immediate and future impacts on the delivery programme. Additional costs arising from the requirement for schemes to evidence water neutrality through on-site and off-setting measures may impact the viability of schemes and the level of affordable housing that can be delivered.</p> <p>Beyond the medium term, the majority of larger sites within the Council boundary that can easily be built upon will have been developed. This will leave smaller sites that are more challenging and contentious in nature and therefore more resource intensive to bring forward or finding other opportunities such as regeneration.</p>	Head of Strategic Housing Services		<p>Officers are engaged in discussions with Natural England and Southern Water as well as with neighbouring local authorities in seeking to minimise impacts on the delivery programme. Work is underway to quantify and maximise headroom to take forward new development through offsetting measures within existing stock. Supported by external consultancy advice officers continue to work up proposals to evidence water neutrality for key developments caught by the new requirements.</p> <p>Roll out of a pilot project within the Council's own housing stock has enabled further water savings to be made and these have been allocated to support the development of key sites. This work will continue to generate further water savings to support more housing development.</p> <p>Work has been undertaken to identify these future sites and opportunities, feeding into the Local Plan, and developing programmes of work. Planning and Housing teams continue to work proactively to maximise opportunities afforded by development within neighbouring Districts and Boroughs adjoining the Council's boundaries. Should the proposal to remove the Duty to Co-operate come into effect this work may be compromised.</p>		Mindful
5.	Homelessness	<p>Following increased demand for temporary accommodation during the pandemic, levels of homelessness continue to rise. The on-going economic impacts from the pandemic, cost of living rises and increased additional demand arising from asylum and refugee resettlement programmes are placing an unprecedented burden on the Council in meeting temporary accommodation duties. Demand for TA significantly outstrips supply necessitating heavy reliance on expensive nightly paid accommodation with significant budgetary implications. Half of the total 2023/24 TA budget allocation had been spent as at the end of July 2023.</p>	Head of Strategic Housing Services		<p>Efforts to relieve and prevent homelessness using all available options continue. 5 additional units of TA have been secured and negotiations are in progress in relation to a potential further 45 units including acquisition of a 27-unit HMO. All potential acquisition opportunities continue to be explored. Three potential sites have been identified for modular housing and consultation in relation to 2 of these sites is being taken forward. The 3<sup>rd</sup> presents issues that mean securing planning consent will be more challenging.</p> <p>Homelessness grant reserves will offset impacts for the current financial year. Under the new Government formula there has been a significant reduction in Homelessness Prevention Grant allocation for the next 2 years which, although offset by transitional protection arrangements to bring it to existing funding levels still represents a reduction in real terms. Representation continues to be made to Government departments and options for collaborative lobbying with other LAs also facing significant challenges are being explored by officers.</p>		Mindful

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6.	Migration/Asylum pressures	<p>Currently Crawley is host to a number of individuals either seeking asylum or providing Afghan Bridging accommodation. These are arrangements made directly by the Home Office.</p> <p>In addition, new legislation has recently been passed to provide those with Chagossian decent UK Citizenship entitlement from British Overseas Territories. The application process went live on 23 November 2022. Revised estimates by the Foreign, Commonwealth &amp; Development Office are that 5000-6000 people will take up this entitlement with a view to moving to the UK, and that the majority will first head to Crawley due to an already established community in the town. Decisions are now taking place with Citizenship ceremonies being arranged. No impact analysis or implementation planning has been put in place by the Government. Potential impacts are wide but none more serious than potential impact on housing and homelessness, in addition to the risks set out in the above entry.</p>	Chief Executive		Ongoing representations to Government officials and relevant Government Ministers from FCDO, Home Office and DLUHC are regularly made, along with a case for CBC to secure additional new burdens funding to assist with costs of housing and resettlement. Temporary housing officer support is also being secured to assist with demand.		Cautious
7.	Three Bridges Station	A way forward for the scheme is unable to be agreed.	Head of Economy & Planning		A planning application for the scheme was submitted autumn 2022 and Planning Committee resolved to permit the application in Q4 2022/23. Work is being progressed with Network Rail and GTR on the processing of the Station Change procedure, the completion of which is required prior to the works starting on site. The scheme features as part of the overall Crawley Growth Programme review jointly with West Sussex County Council which took place in Q3 2022. A comprehensive risk register is overseen by the Project Board of the Crawley Growth programme.		Cautious

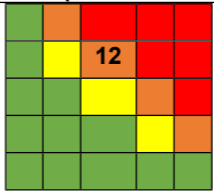
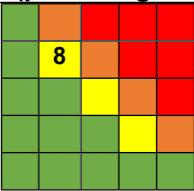
Risk ID	Risk Title	Risk Description	CMT Owner	Risk score (no controls)	Mitigations	Risk score (post mitigation)	Risk Appetite
8.	Disaster Recovery and Business Continuity – Data Breaches or Network Compromise (Hack)	<p>Inadequate technical safeguards and poor staff awareness and practice leads to a compromise of our systems and data.</p> <p>Failure to maintain technical security safeguards – e.g. that firewalls are up to date or that the latest advice from NCSC has not been assessed and followed where appropriate.</p> <p>Improper disclosure of confidential information (in any format i.e. digital, paper etc.) could bring both financial loss (ICO fines, or worse, a ransomware attack) as well as reputational damage to the organisation.</p> <p>Failure to comply with GDPR legislation could lead to major reputational damage, loss of public confidence and the inability to operate key business processes.</p>	Head of Digital & Transformation and Head of Governance, People & Performance (Data Protection Officer)		<p>The Council has made some considerable strides in this area.</p> <ul style="list-style-type: none"> <li>PSN certification achieved again in May 2023.</li> <li>Migration to the Azure (Microsoft) Cloud</li> <li>Implementation of MFA and other technical safeguards mean CBC is well protected.</li> </ul> <p>Training and awareness are key, as well as clear procedures for staff on what to do in the event of suspicious activity or possible breach. Additional foundation training has been delivered to all staff. Staff response to suspicious emails (with further training for those that fail) has been commissioned and began rollout in October 22 which includes regular random testing of all users.</p> <p>A comprehensive Information Management programme is being delivered, which includes new systems (Sharepoint), revised policies and procedures and is delivering training on both systems and GDPR &amp; information management for all staff. The Information Governance Board has been refreshed both in terms of membership and its terms of reference.</p>		Minimalist
9.	Disaster Recovery and Business Continuity – Health & Safety Breaches	<p>Failure to comply with the requirements set out by Health &amp; Safety legislation which covers the functions of the Council.</p> <p>Lack of clarity and / or understanding regarding the legal duties of Managers to ensure that risk assessments in respect of places, activities and people are regularly undertaken.</p>	Head of Governance, People & Performance		<p>Review the council's Health &amp; Safety Handbook for Employees and Health &amp; Safety Policy. Provide training where appropriate.</p> <p>Evaluate the Council's Health &amp; Safety compliance status.</p> <p>Implement a Health &amp; Safety Action Plan for compliance.</p>		Minimalist

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10.	Maintaining a balanced budget	A balanced budget is not achieved in the Medium Term, resulting in an increased use of reserves, which is not sustainable.	Head of Corporate Finance	 16	<p>Quarterly budget monitoring reports are submitted to Cabinet and Overview &amp; Scrutiny Commission. Continuing pressure is being placed on the outturn against budget by the increased employers pay offer (not accepted); the continuing high number of homeless placements; and the challenging conditions for town hall lettings. Any overspend on budget impacts on future years. The challenge of budget exercise has commenced with the aim of identifying savings, efficiencies, and increased income in order to mitigate future budget gaps.</p> <p>Budget projections will be constantly monitored, an all-Member seminar took place on 5<sup>th</sup> January 2023 updating Members on the moving position of budgets and future gaps. The budget report FIN/606 to Cabinet on 1 February identifies a savings target of £701,000 for future years. This target has increased to £1,000,000 due to the adverse budget pressure identified above and the uncertainty over Town Hall letting. This target is considerable and public consultation of options for savings may have to be considered.</p>	 12	Mindful
11.	Organisational Capacity: Recruitment & Retention	<p>Failure to recruit and retain a range of employees including:-</p> <ol style="list-style-type: none"> <li>1) professional roles e.g. lawyers, accountants, planners, EHOs</li> <li>2) manual / front facing roles e.g. Civil Enforcement Office's, Community Wardens, Neighbourhood Services</li> </ol>	Head of Governance, People & Performance	 16	<p>HR is undertaking benchmarking exercise to ensure that the Council is 1) aware of market salaries and trends and 2) may consider measures which might make it more competitive with the view to attracting quality candidates.</p> <p>People Board and HR Team working on developing the Council's "Employer Value Proposition". This will shape future recruitment campaigns and communications with existing staff.</p> <p>HR are working closely with managers to ensure that they properly plan and execute a professional recruitment campaign including quality, modern adverts and better communication and feedback with candidates before, during and after the process.</p> <p>Address the skills gap (and therefore lack of candidates) in the market by potentially "growing our own" experienced staff.</p>	 9	Mindful
12.	Organisational Capacity: Succession Planning	Impact of ageing workforce and an increase of key staff retiring.	Head of Governance, People & Performance	 12	Managers need to undertake PDRs and have open and honest discussions with reports. They should be aware, in advance, of upcoming events e.g., retirements and be planning for recruitment / stepping up / reassigning duties with an appropriate knowledge handover, exit interview etc.	 8	Mindful

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13.	Climate Emergency	<p>Failure to reduce carbon emissions by at least 50% and as close to net zero as possible by 2030.</p> <p>Failure to achieve carbon zero by 2040 at the latest.</p>	Head of Economy & Planning		<p>The Council's Climate Change Emergency Action Plan is in place.</p> <p>Officers are drawing on funds from within the agreed Council budget for 2023-2024 to progress the delivery of Climate Change Action Plan tasks and the Council's carbon emissions reductions targets.</p> <p>Indications are that HMG will reduce intervention to support this work moving forward, reducing the availability of external funding, and increasing the risk of not being able to deliver on key aspects of the plan.</p>		Mindful
14.	National Waste Strategy (including Food Waste)	<p>The National Waste &amp; Resources Strategy is delayed which may impact on the Waste Contract.</p> <p>Letter from DEFRA in July 2023 indicates the Producer Responsibility Regulations (proposed as the means of funding the changes to collection regimes including food waste) will be delayed until 2025. It is therefore likely that the changes to the collection regime will be delayed until 2026.</p>	Head of Major Projects & Commercial Services		<p>To be closely monitored. It seems likely that the Strategy will mandate changes to refuse and recycling collections including the introduction of a mandatory weekly food waste collection. However, the delay in the publication of the National Waste Strategy constrains the ability to amend the specification in advance of the contract re-procurement. To manage this change, the existing contract with Biffa Municipal has been extended until March 2026.</p>		Mindful

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15.	Local Plan	Failure to adopt the Local Plan within the timeframe set by the government	Head of Economy & Planning		<p>The Crawley Local Plan review was further delayed due to the need to demonstrate Water Neutrality for all planned development within the Sussex North Water Resource Zone, cumulatively across all the Plans in the area. A Water Neutrality Strategy to support the emerging Local Plans has been finalised and agreed by all authorities within the Sussex North area, and this has been endorsed by Natural England. An Offsetting Implementation Scheme across Sussex North now needs to be established to deliver the agreed policy approach, which must be in place to support the Local Plan at Examination. A Project Manager has been appointed working across all the councils to progress this work. Following approval by Full Council in February 2023 and a six-week period of Regulation 19 consultation, which ended on 20th June, the Crawley Local Plan 2024-2040 was submitted at the end of July to the government's Planning Inspectorate for Examination. Representations made to the Plan as part of the consultation process will then be considered through the independent Examination (earliest start: autumn 2023), with interested parties (including those supporting and objecting) and the council questioned by an Inspector, to be appointed by the Planning Inspectorate to oversee the Examination of the Plan, who can also query any part of the Plan they wish. The Inspector may find the Local Plan unsound or propose modifications to make it sound. At that point, modifications would then have to be subject to further public consultation and the Plan with any modifications would then have to be approved by Full Council.</p>		Cautious



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16.	Water Neutrality	Failure to agree a Water Neutrality Strategy	Head of Economy & Planning		<p>A Water Neutrality Strategy to support the emerging Local Plans has been finalised and agreed with the other authorities within the area, and this has been endorsed by Natural England following work between the affected council officers and Chief Executives, Natural England, Southern Water, the Environment Agency and government representatives. These parties continue to meet regularly to secure the Offsetting Implementation Scheme. This now needs to be established to deliver the agreed policy approach and enable all the planned development to come forward, following the success of pilot schemes progressed in Crawley with off-site offsetting secured through retro-fitting that has reduced water use in Crawley Homes stock. A Project Manager has been appointed working across all the councils to progress this work. The Council's screening proforma with Natural England enables most householder and minor planning applications to proceed to decision without hindrance. Some developers are securing their own private offsite offsetting measures which is also enabling some limited development to take place where these satisfy the Natural England's water neutrality requirements.</p> <p>A Statement of Common Ground on water neutrality to support the Crawley Local Plan 2024-2040 submission to the Planning Inspectorate has been signed by the Local Planning Authorities affected – Crawley BC, Chichester DC, Horsham DC, Mid Sussex DC, West Sussex CC, South Downs National Park Authority and endorsed by Natural England, Southern Water and the Environment Agency.</p>		Cautious

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17.	Cost of Living	Impact of more residents presenting themselves as homeless and being unable to pay their debts.	CMT		<p>A webpage has been created <a href="https://crawley.gov.uk/council-information/help-money-worries">https://crawley.gov.uk/council-information/help-money-worries</a> designed to direct people to help.</p> <p>Winter warmers programme developed over the summer and morphing into local drop-in advice sessions. Engagement undertaken looking into specific neighbourhood support within our most disadvantaged neighbourhoods with funding available through UKSPF.</p> <p>Lateral implemented to provide a One Council overview of debt, including implementation of 'Breathing Space' within the Corporate Debt Group, Access Crawley working with vulnerable residents with long term debt creating bespoke pathways, and now seeking to extend that model. Work commencing to proactively target households likely not to be claiming all benefits they are entitled.</p> <p>Home visits are taking place where the council is aware that someone is claiming Universal Credit but has not responded to requests for them to claim Council tax reduction.</p> <p>Reserves review taking place to identify reserves to support people being impacted by the cost of living. A project will take place to look at ways of helping to support people, this will include the Wellbeing bus. Will lever in community and voluntary sector support.</p> <p>Whilst lots of mitigations are being implemented, the post-mitigation risk score remains the same given there is no direct control.</p>		Mindful
18.	Towns Fund and related programmes	Risks associated with the delivery of this programme are mainly centered around budget overspend and timescales exceed beyond the Towns Fund end date. A detailed risk register has been produced for each project within the programme.	Head of Economy & Planning		<p>Regular financial monitoring and project monitoring undertaken by the Towns Deal Board and relevant project boards. The Head of Corporate Finance attends the s151 officer meetings involving other local authorities with Towns Fund programmes. Internal assurance is via the Corporate Projects Assurance Group (CPAG), through quarterly reporting on programme / risk updates.</p>		Mindful

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19.	Damp and Mould	<p>Unprecedented demand for residents in Crawley Homes and in the private sector for advice, support, inspections and repairs relating to damp and mould following the death of Awaab Ishak in Rochdale.</p> <p>Demand for services is impacting on business-as-usual service delivery and is impacting responsive repairs budgets for Crawley Homes.</p> <p>Resourcing issues to inspect structural concerns and capacity to build potential demand into the planned maintenance programme.</p> <p>Some structural issues are being assessed and managed in the day-to-day service which is impacting service delivery.</p> <p>Loss of staff due to resignations, impact on resource availability</p> <p>Risk of regulatory involvement.</p>	Head of Crawley Homes		<p>Workflows have been amended for call triage and inspections. Additional sub-contractors have been taken on to reduce the wait time for damp and mould treatment.</p> <p>Inspections are prioritised with building surveyors where structural issues are diagnosed.</p> <p>Pro-active work underway to contact all tenants who have reported damp and mould in the last five years to make sure it has not re-emerged.</p> <p>Damp and mould working group, including officers and contractors</p> <p>Recruitment underway</p> <p>Community event(s) being planned ahead of autumn 2023 to raise awareness and educate residents on self-help</p>		Mindful
20.	Digital Accessibility	<p>We are required to reach minimum level AA of the W3C Web Content Accessibility Guidelines (WCAG 2). This applies to all digital channels, either owned by us or commissioned by us. So, it includes the intranet, ModernGov, myCrawley, DEF planning Register, Abritas, payment portals, etc.</p> <p>The guidelines also apply to any digital content that we disseminate, so documents attached to emails, posts on social media are all included. Any members of staff who creates web content or digital documents should make sure they are accessible.</p> <p>We were assessed in March 22 by the Cabinet Office's, Central Digital &amp; Data Office and were subject to a number of improvement notices. We were informed that they would likely return to reinspect.</p> <p>Aside from the legal requirements there is also the reputational risk if we are found to exclude people by providing inaccessible content.</p> <p>It seems very likely that there will be some test prosecutions arising at some point – CBC needs to mitigate against the risk of being one of those used to inform legislation.</p>	Head of Digital & Transformation		<ul style="list-style-type: none"> <li>• Include accessibility requirements in all procurements involving digital channels or apps</li> <li>• Carry out our own testing of all digital channels</li> <li>• Publish accessibility statement on all sites</li> <li>• Commission external testing of sites as needed (usually during development)</li> <li>• Promote the importance of accessibility to all content owners to raise awareness and understanding</li> <li>• Provide guidance (including signposting to training as needed) to content creators on how to meet the standards for web content and documents</li> <li>• Provide information to content owners on tools to help create, test, and maintain accessible content</li> <li>• Make accessible templates available reduce the risk of creating non-accessible documents</li> <li>• Create workflows to prevent non-accessible content being published</li> </ul>		Mindful