

GUILDFORD BOROUGH COUNCIL

CORPORATE RISK REGISTER – Q1 2024/25

Risk management

The council's risk management strategy defines risk as the effect of uncertainty on objectives. Put another way, a risk is 'an uncertain event that, should it occur, will have an effect on the council's objectives and/or reputation'.

Risk management is the set of coordinated activities designed to manage risk and exercise internal control within an organisation. Robust risk management is a core component of effective corporate governance and is fundamental to how the council is directed, managed and controlled at all levels.

Corporate risk register

The corporate risk register sets out the risks that, based on their likelihood and potential impact, threaten the council's objectives and priorities as set out in the Corporate Strategy and/or other key corporate policies and strategies, including the Medium-Term Financial Plan (MTFP).

The risk register provides each risk's assessed score, the controls and mitigations that are in place and those that are to be implemented in order to bring the risk to a level that is acceptable.

Executive Members and Members of the Corporate Leadership Board (CLB) have shared responsibility for managing corporate risks.

CORPORATE RISKS – Q1 2024/25

Ref.	Title (hyperlinked)	RAG rating	Direction of travel ¹
CR1	Incident or accident at a council property or premises	AMBER	-
CR2	Financial sustainability	RED	-
CR3	Fraud prevention	RED	-
CR4	Major data breach	AMBER	-
CR5	Failure to make lawful decisions and follow governance	RED	-
CR6	Failure to meet target of becoming net carbon zero by 2030	RED	-
CR7	Safeguarding of vulnerable adults and children	AMBER	-
CR8	Insufficient IT model for level of change	AMBER	DOWN
CR9	Non-adherence to procurement processes and contracts	AMBER	DOWN
CR10	Cyber security incident resulting in loss of IT systems or data	AMBER	UP
CR11	Recruitment and retention of staff	AMBER	DOWN
CR12	Guildford-Waverley collaboration objectives	AMBER	-
CR13	Governance of companies and charitable trusts (NEW)	AMBER	-
CR14	Data sharing with Waverley Borough Council (NEW)	AMBER	-

¹ The direction of travel refers to the total risk score compared to that last reported to the Committee in July 2024 (Q4 2023/24).

IMPACT		RISK HEATMAP – Q1 2024/25					
		(risk reference is hyperlinked)					
DEVASTATING	(4)		CR1 CR4 CR7	CR9 CR10	CR3		
	CRITICAL	(3)		CR12	CR2 CR5 CR6		
				CR13	CR8 CR11 CR14		
SIGNIFICANT	(2)						
	SMALL	(1)					
LIKELIHOOD		(1)	(2)	(3)	(4)	(5)	(6)
		ALMOST IMPOSSIBLE	VERY LOW	LOW	MEDIUM	HIGH	VERY HIGH

Risk Scoring Criteria: [please note that the scoring criteria will be reviewed as part of the development of a new risk management strategy]

Score	Likelihood	Indicators	Score	Impact	Indicators
1	Almost impossible	Less than 1% chance of occurring Has happened rarely/never before	1	Small	Loss <£100k Trivial breach or non-compliance Insignificant injury (first aid) Negligible disruption/unnoticed by service users Insignificant damage
2	Very low	1-10% chance of occurring Only likely to happen once in three or more years May have happened in the past	2	Significant	Loss from £100k - £250k Isolated legal action or regulatory breach Minor injury (medical attention) Small disruption/inconvenience to service One-off adverse local publicity
3	Low	10-20% chance of occurring Reasonable possibility it will happen in the next three years Has happened in the past	3	Critical	Loss >£250k - £500k Sustained legal action or (limited) regulatory fine Serious injury (not life threatening) Substantial, short-term disruption/inconvenience to service; Short-term, but wide reaching adverse publicity
4	Medium	20-50% chance of occurring Likely to happen at some point in the next one-two years Circumstances occasionally encountered	4	Devastating	Loss >£500k Major legal action or regulatory sanction Death(s) or multiple serious injuries Major, sustained disruption/serious inconvenience to service Major, long-term damage
5	High	50-80% chance of occurring Almost certain to happen within next 12 months Regular occurrences frequently encountered			
6	Very high	Above 80% chance of occurring Inevitable it will happen within the next 6 months; No influence/control over event occurring			

CR1

Incident or accident at a council property or premises

AMBER

Description

There is a risk that a member of staff, council contractor, or the public is involved in an incident or accident at a council property or premises, or at work, relating to the council's work or services carried out by a contractor or partner delivered on the council's behalf. This could result in serious injury, ill health or loss of life and could result in financial loss and reputational impact to the council. This risk is most significant in waste services, parks and countryside, facilities, parking and street cleaning.

Owners

Service: CLB and all Assistant Directors (including Corporate Health & Safety Group and Premises Managers)

Executive Member: All Portfolio Holders

Officer: All Strategic Directors and Assistant Directors

Mitigations and controls**In place**

Safe Systems of Work – this includes risk assessments and procedures (key risks, mitigations, PPE and checks to be carried out), plus step-by-step instructions of how tasks are done.

Training records – in particular, depot training records are reviewed quarterly and repeat training toolbox talks (bitesize refresher training) are provided for all crews who are involved in safety aspects around a task, i.e. the use of bin lifts. If there are particular key issues, briefings are held with individual crews and drivers.

Corporate Induction training for new starters, with all new staff required to attend this training, which explains the responsibilities as an employee under health and safety legislation and for them to understand their duties and responsibilities whilst at work.

Task Specific Induction training for specific roles/crews – in addition to the corporate induction training, specific induction training and a handbook is issued for new crews. There are regular reviews of training records.

Environmental Permitting Exemptions – as part of the Environmental Permitting Regulations, the council is required to hold a licence for different operations Depot (S1 - storage of textiles and S2 - hazardous waste) which requires an audit of the depot site, together with Stoke Park Nursery (T23 – composting) and Millmead sites (S2 - storage of old IT equipment). Teams are required to monitor their own areas and flag areas of concern. Checks are undertaken on a fortnightly basis at the Depot.

Driver Licence Checks – annual licence checks are undertaken on anyone in the organisation who drives any vehicle driven on council business (includes fleet and grey fleet).

Driver Familiarisation Checks – these are carried out for all new drivers of fleet vehicles and when there are vehicle/equipment changes. They are also reviewed in the event of an accident or if there is a trend in a drivers' performance.

Risk assessments are in place for those roles that require it, with appropriate further controls and mitigations identified as necessary, such as additional training.

Corporate Policies include Accident, Occupational Health, Near Miss, Dangerous Occurrence Reporting Procedure; Corporate Construction Design & Management Policy; Corporate Contractor Activity Control Procedure; Fire Safety; Legionella Control and Asbestos; plus Lone Working & Violence at Work policy. Regular policy reviews are undertaken.

The **Corporate Health and Safety Group** meets every two months and is chaired by the lead Director with responsibility for Health and Safety. The Group co-ordinates, monitors and oversees the management of health and safety across the organisation on behalf of the council's Corporate Management Board to ensure compliance with our overall Health and Safety (Part 1) Policy. The Group comprises senior management representatives from key services together with our occupational health and safety officer and a representative from Unison. Accidents and near misses are also reported to the group for lessons to be learned.

Health & Safety Groups – there are Health & Safety Groups for the Depot, Millmead and Outstations, Parks and Countryside and Community & Housing (which includes discussions relating to The Hive,

CR1**Incident or accident at a council property or premises****AMBER**

sheltered housing, building regs, lone working, safeguarding and mental health of staff) – these groups are chaired by the relevant Assistant Director or Lead Specialist. The Groups pass on information from the Corporate Health & Safety Group and ensure action is taken after incidents as well as near misses. The Health & Safety Lead Specialist attends all the Groups.

Contract management of outsourced services – health and safety matters of outsourced services are managed as part of routine contract management. Reports on contractual performance and reported to Council on an annual basis.

Construction and Design Management (CDM) Regulations Group - The Group co-ordinates, monitors and oversees the management of the 2015 CDM regulations across the organisation on behalf of the council's Corporate Health & Safety Group to ensure compliance with our overall Corporate CDM Policy. A third-party Principal Designer has been appointed to manage the CDM regulations on the council's behalf.

Ongoing programme of **re-training of crews** on all vehicles they are authorised to operate, to ensure driver familiarisation.

To be implemented

Action	Target date
IOSH (Inst. of Occupational Safety & Health) – managing safely training – the council currently has 30 licences, approx. 20 completed the course for managers so further training required for relevant officers (2 year contract expires Feb 2025).	Feb-25
IOSH – request for further licences (approx. £250 per licence) to train all line managers (approx. 70 managers) although will likely do a tranche of 30 managers (£7,500) – funding may be obtained through the corporate training budget, or an additional source of funding will be required.	Dec-24
Review of Crew Handbook and Policies by Waste Operations, Fleet and HR.	Feb-25
Fleet Users Group – re-introducing quarterly meetings to discuss issues, servicing plans, demands, procurement, health and safety elements, to include a representative from Community Services to ensure community vehicles are considered at this group.	Sept-24
Housing Revenue Account H&S Compliance – review and appoint contractors and resources to ensure compliance with the six priority health and safety areas, plus damp and mould and working with the regulator of social housing to address issues raised in the regulatory judgment.	Nov-24

Risk scoring

	Impact	Likelihood	TOTAL	Direction of travel
Gross	Devastating (4)	Low (3)	12	
Residual	Devastating (4)	Very Low (2)	8	
Target	Significant (2)	Very Low (2)	4	

Last updated 31 July 2024

Description

A combination of factors – including difficult macroeconomic conditions, increased costs and demand for services, as well as the wider challenging local government funding context – have created conditions of significant financial uncertainty and challenge for the council.

If not mitigated, there is a risk that the council will be unable to balance its budget in the medium term, which would have significant negative impacts on the achievement of corporate objectives and service delivery and could similarly result in external intervention. The risk is exacerbated by the revenue budget implications of financing the council's ambitious capital programme.

Owners

Service: Finance and Regeneration and Planning

Executive Member: Cllr Richard Lucas, Lead Councillor for Finance and Property; Cllr Tom Hunt, Deputy Leader of the Council and Lead Councillor for Regeneration

Officer: Richard Bates, Joint Strategic Director of Finance/S151 Officer; Abi Lewis, Joint Assistant Director of Regeneration and Planning Policy

Mitigations and controls

In place

As part of the Financial Recovery Plan, the council has implemented robust financial management arrangements and has invested in skills and expertise to support the ongoing delivery of financial and corporate objectives.

A summary of the principal controls and mitigations in place is as follows:

The Annual Revenue Budget (2024/25) – was adopted by [Full Council in February 2024](#). It sets out funding allocations and confirms accountability for ensuring that expenditure and income are managed in accordance with the limits as approved by Members.

Budget monitoring – in year, robust revenue and capital budget monitoring takes place with budget holders; any variances are escalated and mitigations implemented as necessary. Budget monitoring information is regularly reported to Members.

The Medium-Term Financial Plan (2024/25 to 2026/27) – was [reported to Full Council in February 2024](#). It set out the anticipated budget challenges over the coming years and forms the basis for subsequent annual service and financial planning. An MTFP update was reported to the Overview and Scrutiny Committee, the Executive and [Full Council in July 2024](#).

Capital and Investment Strategy (2024/25 to 2028/29) – was approved by [Full Council in February 2024](#). It gives an overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of council services. The strategy also details how associated risks are managed and the implications for the council's future financial sustainability. As part of this work, a Strategic Capital Board has been established to monitor project capital expenditure.

Treasury Management Strategy – was approved by [Full Council in February 2024](#) as part of the Capital and Investment Strategy. It helps ensure that investments achieve returns whilst remaining within approved security and liquidity limits and that borrowing to fund the Capital Programme is affordable.

Asset Disposal Strategy – the strategy was [approved by the Executive in April 2024](#). The strategy included a programme of planned disposals to generate capital receipts to reduce the council's debt levels. The strategy and resultant programme include mechanisms for progress monitoring, including forecasting the time and value of capital receipts to support prudent financial management.

External funding – where available, the council applies for external revenue and/or capital grant funding to support the delivery of services and projects.

Collaboration with Waverley – the collaboration agreement with Waverley has realised savings and created greater economies of scale for the council, helping to offset budget pressures.

Improvement Plan – in January 2024, the council commissioned Solace to undertake a corporate governance review to encompass the entirety of the council's business, structure, processes, systems

CR2

Financial sustainability

RED

and culture. The review found areas for improvement, which have been incorporated into an Improvement Plan that was reported to [Corporate Governance and Standards Committee in May 2024](#).

Debt Recovery Strategy – monitored and reported to CLB on a monthly basis, Executive Briefing and Overview and Scrutiny Committee bi-monthly.


Joint Housing Fraud Investigation Team – an options analysis is being developed, for an in-house fraud investigation team, shared between Waverley and Guildford Borough Councils.

A monthly **Strategic Capital Board** was established in July 2024 to monitor capital project expenditure. As part of this, consideration is also being given as to whether its scope should be broadened to include consideration of asset disposals.

To be implemented

Action	Target date
Weyside Urban Village mitigation plan – as reported to Full Council in May 2024 , a mitigation plan to address the potential financial deficit arising from a growth in external borrowing costs and construction cost increases and reduction in land value will be prepared for the Executive and Full Council.	Nov-24
Improvement Plan – there are several finance specific actions included within the council's Improvement Plan (available here). The plan will continue to evolve until the council has demonstrated improvement against the observations made by Solace.	Ongoing

[Risk scoring](#)

	Impact	Likelihood	TOTAL	Direction of travel
Gross	Devastating (4)	Medium (4)	16	
Residual	Critical (3)	Medium (4)	12	
Target	Significant (2)	Low (3)	6	

Last updated 25 July 2024

Description

There is a risk that our systems are not sufficiently robust to prevent fraud by a resident, staff member, contractor or service user. This could result in the loss/misapplication of public money or property, potential investigation into the council's operating procedures and a compromised democratic process.

Owners

Service: Finance

Executive Member: Cllr Richard Lucas, Lead Councillor for Finance and Property

Officer: Richard Bates, Joint Strategic Director of Finance/S151 Officer

Mitigations and controls

In place

Anti-Fraud and Corruption Policy – the policy was reviewed and updated and was approved by the [Corporate Governance & Standards Committee on 11 April 2024](#) and approved by the [Executive at their meeting on 16 May 2024](#). The council encourages staff and others to report any cases of suspected wrongdoing or misconduct, illegal acts, or failure to act within the council, as part of its commitment to act with integrity and openness in the best interest of its residents and communities.

Whistleblowing Policy – this policy was adopted by [the Executive at their meeting on 25 January 2024](#), with further updates by the Monitoring Officer presented to [Corporate Governance & Standards Committee on 11 April 2024](#). The Policy aims to encourage and enable anyone to raise issues of concern about suspected improper conduct in the way the council carries out its business. It aims to give staff, councillors and others, the confidence to raise concerns by assuring them that they can do so without fear of harassment, victimisation or reprisals. It also confirms the council's commitment to investigate and rectify any malpractice reported to us swiftly and thoroughly. An annual report on whistleblowing for 2023/24 was reported to the [Corporate Governance and Standards Committee on 6 June 2024](#).

Internal training – key officers from Finance, Housing and Governance have recently attended fraud prevention and awareness training and are actively using the insight gained to improve the internal fraud control environment.

Procurement processes – The Contract Procedure Rules (Part 4) are included within the council's Constitution and were reviewed at the meeting of the [Guildford & Waverley Joint Constitutions Review Group on 29 May 2024](#). The Rules apply to all purchases of works, goods, and services by the council. They provide a framework within which all the procurement activity of the council is undertaken. The object of these Rules is to ensure that all the council's procurement activity regardless of value is fair, open, transparent, non-discriminatory, and lawful. Their observance is mandatory. The Rules are to protect the interests of the council and also councillors and officers from the risk of challenge, undue criticism, or allegations of wrongdoing.

Head of Procurement – a new Head of Procurement joined the council in June 2024 and brings with them a considerable amount of knowledge in relation to procurement regulations, in particular the forthcoming Procurement Act 2023. They will be reviewing the requirement to have a central contracts database and to understand the risk/impact criticality of each contract. In addition to the work already undertaken, they will be looking to improve the system, processes and provide training for both members and officers.

Independent Governance Review – in January 2024, the council commissioned Solace to undertake a corporate governance review to encompass the entirety of the council's business, structure, processes, systems and culture. Alongside this, they were also commissioned to look at Guildford's housing landlord function, following the findings to a wider housing investigation into criminal offences. An Improvement Plan resulting from both reviews was reported to [Corporate Governance and Standards Committee on 15 May 2024](#) with key actions to reduce the future risk of fraud. This includes improved budget monitoring, procurement and contract management practices.

Lessons learnt - we are learning from current circumstances to put in place better systems. We will look to recover losses and escalate to the police if necessary.

Fraud checks – several fraud checks are carried out by different services across the council, including:

- Fraud checks for Housing (undertaken by Reigate & Banstead Borough Council on our behalf) to check for tenancy fraud and eligibility to purchase a Right to Buy property.
- The Casework team routinely undertake eligibility/identity checks for applicants registering for homes and when allocating and letting homes. Checks are also made by the Benefit Fraud team.
- The Casework team undertake supplier checks, particularly when there is a change of bank details.
- As part of the recruitment process, the Casework team carry out employee checks, including proof of right to work; DBS checks for relevant roles (including casuals); medical checks to ensure fit to work; obtain references to the cover the last 5 years, but if not available, recruitment is made at the managers' discretion.
- The National Fraud initiative also provides data which enables the council to do cross checks on public sector data to identify potential fraud.


Internal audit – as part of the risk based internal audit plan, the council's internal auditors (the Southern Internal Audit Partnership) carry out audits in service areas where there is a potential fraud risk. Any areas of weakness identified are addressed through comprehensive management actions.

Housing maintenance – limits on expenditure with suppliers have been built into Orchard and are monitored. Regular housing maintenance reporting takes place against budgets. Payments are approved by senior officers based on documented and approved processes.

To be implemented

Action	Target date
Housing Improvement Plan – to carry out the actions included within the council's Improvement Plan (available here). The plan will continue to evolve until the council has demonstrated sufficient improvement against the observations made by Solace.	Ongoing
Procurement Act 2023 compliance – the council's new Head of Procurement will ensure that the council is fully compliant with the requirements of the Act, including staff training (across both councils) and implementing new systems and processes where necessary.	Oct-24
Replacement of the housing system – as per the council's Improvement Plan, a new housing system will be implemented to interface with the council's finance system.	2027
Joint Housing Fraud Investigation Team – an options analysis is being developed, for an in-house fraud investigation team, shared between Waverley Borough Council and Guildford Borough Council.	TBC

Risk scoring

	Impact	Likelihood	TOTAL	Direction of travel
Gross	Devastating (4)	Very High (6)	24	
Residual	Devastating (4)	Medium (4)	16	
Target	Critical (3)	Low (3)	9	

Last updated 7 August 2024

CR4

Major data breach

AMBER

Description

There is a risk that the council experiences a major data breach. This could result in multiple sensitive records of service users' personal data being inadvertently disclosed and could result in associated legal governance and potentially reputational (and/or financial) damage to the council.

Owners

Service: Organisational Development; Legal and Democratic Services

Executive Member: Cllr Carla Morson, Lead Councillor for Community and Organisational Development; Cllr Merel Rehorst-Smith, Lead Councillor for Regulatory and Democratic Services

Officer: Robin Taylor, Interim Senior Information Risk Officer (SIRO)/Joint Assistant Director for Organisational Development; Susan Sale, Joint Strategic Director of Legal & Democratic Services/ Monitoring Officer; Peter Stevens, Joint Assistant Director for Communications and Customer Services

Mitigations and controls**In place**

Information Assurance Officer – joined the council in mid-May and will be reviewing council systems to ensure that teams and providers have appropriate security policies and procedures in place. The officer will also support services with data security issues and will provide skills and awareness training.

Privacy and Data Protection Policy – is in place and is due to be reviewed in 2025. It forms part of the council's Information Security Framework and is subject to review in the light of changes in the law and Information Commissioner's guidance. It sets out the roles and responsibilities of officers and is managed by the Information Governance Manager. The policy includes guidance on data breaches and the process to follow.

Information Risk Group – chaired by the Joint Assistant Director of Organisational Development, the role of this group is to identify information related risk and provide advice on the effective management of all council-held information by ensuring compliance with relevant legislation and effective risk management practices.

Data Protection and Information Security – an annual update is reported to the [Corporate Governance & Standards Committee in September 2023](#) which includes an update on compliance with statutory requirements. The next report is due to be considered at committee on 26 September 2024.


Data Protection training – the training is a requirement for all staff to complete and is included in the council's induction training for new-starters. Regular refresher training sessions is also offered to staff.

Information Commissioner (ICO) – as well following the guidance set out in the Privacy and Data Protection Policy, from time to time we seek advice from the ICO and when necessary, an independent review is undertaken if breaches are escalated at the second stage, prior to submission to the ICO.

ICT Users and Information Systems Security Policies – these policies are provided to new starters on their first working day as part of the induction process. They provide guidance on the proper usage of corporate IT resources.

To be implemented

Action	Target date
In recognition of the importance of information governance and data protection , a review of the service will be carried out to ensure it is appropriately resourced and is resilient. Any actions arising from this review will be addressed as necessary.	Dec-24
The ICT user policy will undergo a review to ensure it appropriately covers all data protection and information governance considerations.	TBC

CR4	Major data breach			<u>AMBER</u>
<u>Risk scoring</u>				
	Impact	Likelihood	TOTAL	Direction of travel
Gross	Devastating (4)	Medium (4)	16	
Residual	Devastating (4)	Very Low (2)	8	
Target	Critical (3)	Very Low (2)	6	
Last updated	21 August 2024			

CR5

Failure to make lawful decisions and follow governance

RED

Description

There is a risk that the council fails to make lawful decisions and follow governance procedures as set out in the council's Constitution. This could result in legal challenge, reputational damage, costs to the council in relation to time, quality and budget slippage on capital projects, as well as fraud, and may lead to overspends/underspends, lower quality results and delayed projects and programmes.

Owners

Service: Legal & Democratic Services; Organisational Development; Regeneration and Planning Policy; Finance

Executive Member: Cllr Carla Morson, Lead Councillor for Community and Organisational Development; Cllr Richard Lucas, Lead Councillor for Finance and Property; Cllr Tom Hunt, Deputy Leader of the Council and Lead Councillor for Regeneration; Cllr Merel Rehorst-Smith, Lead Councillor for Regulatory and Democratic Services

Officer: Susan Sale, Joint Strategic Director of Legal & Democratic Services/Monitoring Officer; Robin Taylor, Joint Assistant Director of Organisational Development; Richard Bates, Joint Strategic Director of Finance/S151 Officer; Abi Lewis, Joint Assistant Director of Regeneration and Planning Policy

Mitigations and controls**In place**

Monitoring Officer – this is a statutory function carried out by the Strategic Director of Legal and Democratic Services or nominated deputies. As set out in Part 4 of the council's [Constitution](#), the responsibilities include provision of professional legal and ethical advice to the council and reporting to Full Council if they consider that any proposal, decision or omission would give rise to unlawfulness or if any decision or mission has given to maladministration.

Constitutional training – training on constitutional decision making was held in December/January 2023 with members and officers.

Independent Governance Review and Improvement Plan – in January 2024, the council commissioned Solace to undertake a corporate governance review to encompass the entirety of the council's business, structure, processes, systems and culture. Alongside this, they were also commissioned to look at Guildford's housing landlord function, following the findings of a wider housing investigation into criminal offences. An Improvement Plan for both reviews was reported to the [Corporate Governance and Standards Committee on 15 May 2024](#). A number of actions concern improving governance at the council and which are being actively progressed, with several now in place. Progress is reported monthly to members and six-monthly to Full Council. Further, an Independent Assurance Panel has been established to oversee the council's improvement journey.

Procurement – The Contract Procedure Rules (Part 4) are included within the council's Constitution and were reviewed at the meeting of the [Guildford & Waverley Joint Constitutions Review Group on 29 May 2024](#). The Rules apply to all purchases of works, goods, and services by the council. They provide a framework within which all the procurement activity of the council is undertaken. The object of these Rules is to ensure that all the council's procurement activity regardless of value is fair, open, transparent, non-discriminatory, and lawful. Their observance is mandatory. The Rules are to protect the interests of the council and also councillors and officers from the risk of challenge, undue criticism, or allegations of wrongdoing.

Scheme of Delegation – an updated Officer Scheme of Delegation was [approved by Full Council on 23 July 2024](#). The updated scheme ensures its ongoing robustness in setting out the responsibilities of officers and the limits of their decision-making powers. The Scheme of Delegation has been aligned with Waverley Borough Council to support efficient decision making at the joint management level.

Financial Procedural Rules – updated Financial Procedural Rules were approved by [Full Council on 23 July 2024](#). The updated procedural rules, aligned with Waverley Borough Council, will improve the governance procedures for each council and will enhance efficient joint working and ongoing collaboration.

Contract Procedure Rules – updated Contract Procedure Rules (CPRs) were approved by [Full Council on 23 July 2024](#). Robust CPRs are a requirement under section 135 under the 1972 Local Government

CR5	Failure to make lawful decisions and follow governance	RED
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Act and help promote good procurement practice, good governance and decision making and ultimately the achievement of best value from council expenditure.

Procurement Training – a training package for officers and members is being rolled out by the new Head of Procurement.

Procurement Toolkit – provides the tools and guides to assist officers for all levels of procurement, including Project Initiation documents, Contract Management procedure guides, Bid Evaluation, and Managing Contract Criticality.

To be implemented

Action	Target date
Improvement Plan – there are several governance specific actions included within the council’s Improvement Plan (available here). The plan will continue to evolve until the council has demonstrated improvement against the observations made by Solace.	Ongoing
Constitution review – a review is underway to ensure its ongoing robustness, particularly as the council continues to collaborate with Waverley Borough Council.	Sept-25
Terms of reference of committees are being reviewed to support effective scrutiny and governance. It is anticipated that an Audit Committee will be established as part of this process.	Dec-24
Key Performance Indicator (KPI) – as part of the new suite of corporate performance indicators for 2024/25, a KPI is being developed to monitor third party spend on compliance which will be shown as a whole council then with a breakdown per directorate.	Jan-25

Risk scoring

	Impact	Likelihood	TOTAL	Direction of travel
Gross	Critical (3)	High (5)	15	
Residual	Critical (3)	Medium (4)	12	
Target	Significant (2)	Very Low (2)	4	

Last updated	7 August 2024
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CR6

Failure to meet target of becoming net carbon zero by 2030

RED

Description

In 2019 the council declared a climate emergency and resolved to achieve net zero by 2030. An action plan was developed to guide the council's journey to net zero, which recognised that doing so was a significant challenge, dependent on technological advances, reductions in costs, wider financial support from central government and other agencies, as well as societal shifts. Despite making progress on the journey to net zero, there remains a risk that the council will not achieve its target. This could negatively impact on the council's reputation as well as result in the non-achievement of potential savings from energy use reduction.

Owners

Service: Organisational Development

Executive Member: Cllr George Potter, Lead Councillor for Environment and Climate Change

Officer: Robin Taylor, Joint Assistant Director of Organisational Development; Nat Prodger – Climate Change Officer

Mitigations and controls**In place**


Climate Change Action Plan – was adopted to provide a clear pathway to net zero carbon. A revised carbon reduction trajectory report will allow the council to better forecast its success at reaching the target. The action plan is reviewed annually and a top ten of priority areas is agreed for delivery.

Climate Change Board – this board provides an overview and scrutiny role to oversee and help develop the action plan. It also offers support to services within the council to push our climate change agenda.

To be implemented

Action	Target date
Continue to pursue initiatives identified in the Climate Change Action Plan .	Ongoing
Carbon budget – as identified in the emerging Corporate Strategy, consideration is being given to the establishment of a carbon budget to account for the carbon impacts of the council's operations.	TBC
Carbon offsetting – as part of the Climate Change Action Plan, the council is looking at ways of offsetting their carbon emissions, for example, tree planting in certain areas, to help to absorb carbon.	TBC

Risk scoring

	Impact	Likelihood	TOTAL	Direction of travel
Gross	Critical (3)	High (5)	15	
Residual	Critical (3)	Medium (4)	12	
Target	Significant (2)	Very Low (2)	4	

Last updated

21 August 2024

CR7

Safeguarding of vulnerable adults and children

AMBER

Description

There is a risk that vulnerable adults and children are not properly safeguarded. This could result in harm to them if we do not fulfil our obligations. The risk is currently heightened due to the thresholds of intervention of statutory services. The thresholds leave a gap of care and support that cannot always be met by the council but involve residents accessing our services regularly. This could result in more serious adult or children case reviews which involve challenge and possible reputational damage.

Owners

Service: Community Services

Executive Member: Cllr Carla Morson, Lead Councillor for Community and Organisational Development

Officer: Sam Hutchison, Joint Assistant Director of Community Services

Mitigations and controls**In place**

Safeguarding policy and procedures - reviewed regularly and included in the corporate induction training.

DBS checks are carried out for all key roles and where this is required by the Joint Assistant Director of Community Services, particularly for officers who interface with vulnerable customers.

Refer all safeguarding cases and notify team and maintain and monitor the operational corporate spreadsheet.

To be implemented

Action	Target date
Recruitment of an officer to manage the strategic development of safeguarding across the organisation and to fulfil recent internal audit recommendations.	Dec-24
A safeguarding children and adults at risk policy will be developed and it implemented. The policy is due to be considered by the Overview & Scrutiny Committee (Services) on 3 February 2025, but will be dependent on the recruitment of an officer to drive this forward.	Mar-25

Risk scoring

	Impact	Likelihood	TOTAL	Direction of travel
Gross	Devastating (4)	Low (3)	12	
Residual	Devastating (4)	Very Low (2)	8	
Target	Critical (3)	Very Low (2)	6	

Last updated 30 July 2024

CR8

Insufficient IT model for level of change

AMBER

Description

There is a risk that the current IT model and level of resource is not sufficient or viable for the level of change happening in the organisation. This could result in impact on the collaboration with Waverley Borough Council and/or business as usual for the ICT team and other services.

Owners

Service: Communications and Customer Services

Executive Member: Lead Cllr Angela Goodwin for Engagement and Customer Services

Officer: Peter Stevens, Joint Assistant Director of Communications and Customer Services

Mitigations and controls**In place**

Service and financial planning – the council undertakes an annual budget setting process where resources are allocated to meet objectives.


ICT and Digital Programme Board – the Board oversees the strategic delivery of the ICT and digital programme(s) within the council and helps ensure its alignment with wider objectives, as well as security and technological priorities. The Board also reconciles demand on ICT change capacity with the council's resources.

Project and programme management framework – the council's programme and portfolio management framework requires changes initiatives, delivered via projects and programmes, to develop robust business cases. Internal staff resource is considered within business case development.

To be implemented

Action	Target date
Improvement Plan – there are several resource specific actions included within the council's Improvement Plan (available here). The plan will continue to evolve until the council has demonstrated sufficient improvement against the observations made by Solace.	Ongoing
Development of a new ICT Strategy – to be aligned with the ambitions of the new Corporate Strategy as well as other emerging strategies.	TBC

Risk scoring

	Impact	Likelihood	TOTAL	Direction of travel
Gross	Critical (5)	Low (3)	15	
Residual	Significant (2)	Medium (4)	8	
Target	Significant (2)	Low (3)	6	

Last updated

29 July 2024

Description

There is a risk that procurement processes and contracts are not being managed or adhered to across the council. This could result in reduced value for money and lack of financial and legal control.

Owners

Service: Finance; Regeneration & Planning Policy

Executive Member: Cllr Richard Lucas, Lead Councillor for Finance and Property; Cllr Tom Hunt, Deputy Leader of the Council and Lead Councillor for Regeneration

Officer: Richard Bates, Joint Strategic Director of Finance; Susan Sale, Joint Strategic Director of Legal & Democratic Services/Monitoring Officer

Mitigations and controls**In place**

Procurement processes – The Contract Procedure Rules (Part 4) are included within the council's Constitution and were reviewed at the meeting of the [Guildford & Waverley Joint Constitutions Review Group on 29 May 2024](#). The Rules apply to all purchases of works, goods, and services by the council. They provide a framework within which all the procurement activity of the council is undertaken. The object of these Rules is to ensure that all the council's procurement activity regardless of value is fair, open, transparent, non-discriminatory, and lawful. Their observance is mandatory. The Rules are to protect the interests of the council and also councillors and officers from the risk of challenge, undue criticism, or allegations of wrongdoing.

Head of Procurement – a new Head of Procurement joined the council in June 2024 and brings with them a considerable amount of knowledge in relation to procurement regulations, in particular the forthcoming Procurement Act 2023. They will be reviewing the requirement to have a central contracts database and to understand the risk/impact criticality of each contract. In addition to the work already undertaken, they will be looking to improve the system, processes and provide training for both members and officers.

Project and programme management framework – project and programme delivery invariably requires the procurement of goods and services. As such, procurement is a key consideration of the council's business case development for projects and programmes, in accordance with HM Treasury Green Book guidance. Standard templates have been developed to aid officers in procuring goods and services and integrating it with project management practices. An overarching officer governance board (Enterprise Portfolio Board) oversees the governance of all projects and programmes.


Contract Procedure Rules – updated Contract Procedure Rules (CPRs) were approved by [Full Council on 23 July 2024](#). Robust CPRs are a requirement under section 135 under the 1972 Local Government Act and help promote good procurement practice, good governance and decision making and ultimately the achievement of best value from council expenditure.

Training – a training package for officers and members is being rolled out by the new Head of Procurement.

Procurement Toolkit – provides the tools and guides to assist officers for all levels of procurement, including Project Initiation documents, Contract Management procedure guides, Bid Evaluation, and Managing Contract Criticality.

To be implemented

Action	Target date
Procurement Act 2023 compliance – the council's new Head of Procurement will ensure that the council is fully compliant with the requirements of the Act, including implementing new systems and processes where necessary.	Oct-24
Future service delivery model – as part of the above, the future delivery model of the procurement function will be considered and a business case developed. The new	Sept-24

CR9	Non-adherence to procurement processes and contracts			<u>AMBER</u>
delivery model will ensure that the council is compliant with procurement regulations and derives best value from its spending.				
Key Performance Indicators (KPIs) – as part of the new suite of corporate performance indicators for 2024/25, a KPI is being developed to monitor third party spend on compliance which will be shown as a whole council then a breakdown per directorate.				Jan-25
Central Contracts Database – the Head of Procurement will be reviewing the requirement to have a central contracts database and to understand the risk/impact criticality of each contract. Once complete a contracts register will be produced.				Ongoing
<u>Risk scoring</u>				
	Impact	Likelihood	TOTAL	Direction of travel
Gross	Devastating (4)	Very high (6)	24	
Residual	Devastating (4)	Low (3)	12	
Target	Critical (3)	Low (3)	9	
Last updated	7 August 2024			

CR10	Cyber security incident resulting in loss of IT systems or data	<u>AMBER</u>
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Description

There is a risk that the council experiences a loss of IT systems or data, for example as a result of a cyber security incident.

Owners

Service: Communications and Customer Services and Communications.

Executive Member: Lead Cllr Angela Goodwin for Engagement and Customer Services

Officer: Peter Stevens, Joint Assistant Director of Communications and Customer Services, James Beach, IT Lead Specialist.

Mitigations and controls

In place


The council has **multi-layered defences** to maintain systems and network resilience, in line with government guidelines and requirements.

Business continuity plans – the council maintains an overarching strategic business continuity plan to manage disruption from an IT outage, resulting from a malicious cause or otherwise.

To be implemented

Action	Target date
ICT refresh programme – the programme includes the planned decommissioning of technologies necessary for cyber security.	Nov-24
Cyber resilience programme – will be implemented, comprised of a number of key deliverables to heighten cyber resilience and defences across the council in line with evolving threats.	Ongoing

Risk scoring

	Impact	Likelihood	TOTAL	Direction of travel
Gross	Devastating (4)	Medium (4)	16	
Residual	Devastating (4)	Low (3)	12	
Target	Critical (3)	Very Low (2)	6	

Last updated	29 July 2024
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Description

There is a risk that the council is unable to recruit and retain suitably qualified and motivated staff. This could result in reduced capacity to deliver, compromise service delivery and quality, redirection of resources and increased spend on consultants and agency staff.

Owners

Service: Organisational Development

Executive Member: Cllr Carla Morson, Lead Councillor for Community and Organisational Development

Officer: Robin Taylor, Joint Assistant Director of Organisational Development; Francesca Chapman, Lead Specialist - HR

Mitigations and controls**In place**


Pay Policy Statement 2024-25 - we aim to design our pay policies and procedures to ensure that pay levels reflect the relative demands and responsibilities of posts, together with the knowledge, skills and capabilities necessary to ensure that the post's duties are undertaken to the required standard. The aim behind this [Pay Policy Statement](#) is to ensure that our approach to pay is transparent. This policy statement meets the requirements of the Localism Act in this regard and also meets the requirements of guidance issued by the Secretary of State for Housing, Communities and Local Government to which the authority is required to have regard under Section 40 of the Act.

Monitoring of staff turnover data – while a level of turnover is healthy for any organisation, elevated levels can cause service delivery issues as well as being indicative of wider organisational issues. Turnover data is closely monitored by Human Resources, with leavers' surveys and exit interviews undertaken with staff to monitor and understand trends. Staff turnover data is reported to senior officers and the Overview and Scrutiny Committee (Resources) as a corporate KPI. Turnover in Q1 of this year stands at 10%, down from 14% in Q1 2023/24.

Use of interim and agency staff – to meet short-term capacity pressures and to deliver specific pieces of work.

To be implemented

Action	Target date
New People Strategy – a joint People Strategy is in the process of being developed for both Guildford and Waverley. The new strategy will recognise that our staff are our greatest asset and will articulate how we will invest in them so that they have the skills and expertise needed to deliver on our priorities as set out in our new corporate strategy. The strategy will foster, promote and nurture a positive, high performing culture that encourages and supports staff to innovate, challenge and achieve for our residents and businesses. It will also set out specific initiatives for how the council will manage any recruitment and retention challenges.	Autumn 2024
Key Performance Indicator (KPI) – as part of developing a new suite of KPIs for 2024/25, consideration is being given to reporting on the ratio of interim (agency) staff against permanent staff. The aim is to report on the balance between using agency staff to meet short term capacity pressures against the need to recruit to posts on the establishment with the long-term aim of reducing costs on staffing.	Jan-25

CR11	Recruitment and retention of staff			<u>AMBER</u>
<u>Risk scoring</u>				
	Impact	Likelihood	TOTAL	Direction of travel
Gross	Critical (3)	Very High (6)	18	
Residual	Significant (2)	Medium (4)	8	
Target	Significant (2)	Low (3)	12	
Last updated	21 August 2024			

CR12

Guildford-Waverley collaboration does not meet objectives

AMBER

Description

There is a risk that the Guildford-Waverley collaboration does not meet its objectives or is not politically supported. This could result in increased/sustained financial difficulty to the council and may cause resources to be redirected; the council being unable to produce a balanced budget and reputational damage; disruption to service delivery.

Owners

Service: All

Executive Member: Leader of the Council, Cllr Julia McShane, Cllr Carla Morson, Lead Councillor for Community and Organisational Development

Officer: Pedro Wrobel, Joint Chief Executive; Robin Taylor, Joint Assistant Director of Organisational Development

Mitigations and controls**In place**

Transformation & Collaboration Programme – in July 2021 both councils agreed to enter a collaboration, starting with the appointment of a Joint Management Team as a way of bringing forward further business cases for collaboration. In [November 2023, the Executive](#) adopted a programme of work setting out the progress made so far, together with recommendations in respect of future collaboration, including options analyses, governance, and financial matters.

The **Guildford and Waverley Joint Governance Committee** is the overarching body to review and monitor the actions and changes set out in the Inter-Authority Agreement and the Collaboration programme risk register.

Inter-Authority Agreement (IAA) between Guildford and Waverley Borough Councils sets out the legal framework under which the partnership will operate. It sets out the principles of how the two organisations will work together and how assets will be used, how staff will work for both councils, and how costs and savings achieved from the benefits of the partnership will be shared. It also contains a formal dispute resolution process, should the two councils be unable to reach agreement on a particular issue. The heads of terms for the IAA were approved by both [Full Councils in April 2022](#), following weekly meetings of a councillor working group. Proposed changes to the IAA were reported to the [Joint Governance Committee on 3 June 2024](#).

Collaboration programme risk register – risks relating to the collaboration are reported on the collaboration risk register and reported to the Joint Governance Committee. The risk register was last reported to the [Committee on 3 June 2024](#).


Constitutional Training – training on constitutional decision making was held in December/January 2023 with members and officers.

Scheme of Delegation – an updated Officer Scheme of Delegation was [approved by Full Council on 23 July 2024](#). The updated scheme ensures its ongoing robustness in setting out the responsibilities of officers and the limits of their decision-making powers. The Scheme of Delegation has been aligned with Waverley Borough Council to support efficient decision making at the joint management level.

Financial Procedural Rules – updated Financial Procedural Rules were approved by [Full Council on 23 July 2024](#). The updated procedural rules, aligned with Waverley Borough Council, will improve the governance procedures for each council and will enhance efficient joint working and ongoing collaboration.

To be implemented

Action	Target date
Improvement Plan – there are several collaboration specific actions included within the council's Improvement Plan (available here). The plan will continue to evolve until the	Ongoing

CR12	Guildford-Waverley collaboration does not meet objectives			<u>AMBER</u>
council has demonstrated sufficient improvement against the observations made by Solace.				
Constitution review – a review is underway to ensure its ongoing robustness, particularly as the council continues to collaborate with Waverley Borough Council.				Sept-25
Local Partnerships , an in-house consultancy of the Local Government Association, have been commissioned to undertake a cost benefit analysis of the collaboration to date. The subsequent report will also consider future opportunities for collaboration and will be reported to Full Council in the autumn.				Oct-24
<u>Risk scoring</u>				
	Impact	Likelihood	TOTAL	Direction of travel
Gross	Critical (3)	Medium (4)	12	
Residual	Critical (3)	Low (3)	9	
Target	Significant (2)	Very Low (2)	4	
Last updated:	30 August 2024			

Description

The council has an interest in various companies and charitable trusts. As a recent report commissioned by the council from Solace notes, there are concerns regarding the governance of these entities. Inadequate governance arrangements create several risks, including that the council's objectives and interests are not being best served, that financial risks and liabilities are not well understood, as well as risking non-compliance with legislative requirements, such as statutory reporting and the filing of accounts.

Owners

Service: Legal and Democratic Services

Executive Member: Cllr Merel Rehorst-Smith, Lead Councillor for Regulatory and Democratic Services

Officer: Susan Sale, Joint Strategic Director of Legal and Democratic Services; Richard Bates, Joint Strategic Director of Finance/S151 Officer; and Pedro Wrobel, Joint Chief Executive.

Mitigations and controls**In place**

An **Executive Shareholder and Trustee Committee** is in operation and discharges the shareholder and trustee functions of the council in accordance with the Companies Act (2006) and Charities Act (2011).

As reported to the Executive Shareholder and Trustee Committee on [8 August 2024](#), approval was given to proposed changes to **governance arrangements for companies and charities**, as well as reporting arrangements to officers and to committee members. Approval was also given to a proposed change to the committee's terms of reference to cover companies and charitable trust matters.


At this meeting, **delegated authority** was given to the Joint Chief Executive, in consultation with the Leader of the Council, to appoint an additional Director to the Board of Guildford Sportsground Management Company as soon as possible and to replace existing appointments with alternative appointments on behalf of the Council and to appoint an additional Director to the Board of Guildford Borough Council Holdings Limited as soon as possible.

A **draft work programme** was agreed for routine matters within the remit of the Committee, including an annual business plan, quarterly/annual accounts and performance reporting for each Council Company.

As reported to the Executive Shareholder and Trustee Committee on [8 August 2024](#) the Lead Officer for North Downs Housing Ltd approval was given for an **options appraisal** be undertaken to inform the future of the Company.

To be implemented

Action	Target date
Appointment of a temporary company lawyer to review governance documents including Articles of Association and Shareholder Agreements and providing training to Trustees, Directors and Officers.	Oct-24
A review will be provided by the Joint Strategic Director of Finance/S151 Officer concerning loans to companies.	TBC
The Joint Chief Executive Officer to exercise his delegated authority, in consultation with the Leader of the Council to make the Director appointments to the Board of the Guildford Sportsground Management Company and Guildford Borough Council Holdings Limited.	Ongoing
To receive a report from the Lead Officer for Guildford Sportsground Management Company reviewing the objectives and arrangements for the Council's interest in that Company.	Nov-24

CR13	Governance of companies and charitable trusts			<u>AMBER</u>
To receive a report from the Lead Officer for Guildford Borough Council Holdings Limited reviewing the objectives and arrangements for the future of Guildford Borough Council Holdings Limited.				Nov-24
To receive a report from the Council's Statutory Officers starting the process of reviewing the governance arrangements and Council's interests in Charities and Trusts.				Nov-24
<u>Risk scoring</u>				
	Impact	Likelihood	TOTAL	Direction of travel
Gross	Critical (3)	Low (3)	9	
Residual	Significant (2)	Low (3)	6	
Target	Significant (2)	Very Low (2)	4	
Last updated	30 August 2024			

Description

Data sharing is key to the collaboration programme between Guildford and Waverley. There is a risk, however, that the personal data of residents and staff is being shared with Waverley as part of the collaboration and in the absence of a robust information sharing policy, as well as the underlying IT solutions. It is possible that any such sharing would be contrary to the Data Protection Act (2018). There is also a risk of non-compliance with the Freedom of Information Act (2000), as well as data loss, ultimately resulting in inefficient service delivery.

Owners

Service: Legal and Democratic Services

Executive Member: Cllr Merel Rehorst-Smith, Lead Councillor for Regulatory and Democratic Services

Officer: Susan Sale, Joint Strategic Director of Legal and Democratic Services; Claire Beesly, Legal Services Manager

Mitigations and controls**In place**

A **data sharing agreement** is in place between the two authorities in respect of joint staff, though it is no longer adequate for the needs of the collaboration and must therefore be improved (see below).

Privacy and Data Protection Policy – is in place and is due to be reviewed in 2025. It forms part of the council's Information Security Framework and is subject to review in the light of changes in the law and Information Commissioner's guidance. It sets out the roles and responsibilities of officers and is managed by the Information Governance Manager. The policy includes guidance on data breaches and the process to follow.


Information Risk Group – the role of this group is to identify information related risk and provide advice on the effective management of all council-held information by ensuring compliance with relevant legislation and effective risk management practices.

Data Protection and Information Security – an annual update is reported to the [Corporate Governance & Standards Committee in September 2023](#) which includes an update on compliance with statutory requirements. The next report is due to be considered at committee on 26 September 2024.

Data Protection training – the training is a requirement for all staff to complete and is included in the council's induction training for new-starters. Regular refresher training sessions are also offered to staff.

To be implemented

Action	Target date
A staff survey will be circulated to understand the scale of data sharing issues, which may result in further training sessions and change of practices.	Sept-24
Following the outcome of the staff survey, actions will include: <ul style="list-style-type: none"> an audit of data that is shared between the two councils, helping to target efforts for improvement. update key policies and procedures, including privacy notices to cover the processing of data. explore an IT solution to improve the functionality and compliance of data sharing between the two councils. 	TBC
Data sharing agreement refresh in relation to both personal and commercial data – to introduce a new, fit for purpose data sharing agreement for the sharing of data of all joint staff and other officers employed by both authorities.	TBC

CR14	Data sharing with Waverley Borough Council			<u>AMBER</u>
Carry out data protection impact assessments for datasets and services.				When identified
Each service to update their Privacy Statements published on the council's website.				TBC
<u>Risk scoring</u>				
	Impact	Likelihood	TOTAL	Direction of travel
Gross	Critical (3)	High (5)	15	
Residual	Significant (2)	Medium (4)	8	
Target	Significant (2)	Low (3)	6	
Last updated	30 August 2024			