

Committee(s)	Dated:
Establishment Committee	26 February 2018
Subject: Comptroller and City Solicitor's Departmental Risk Management report	Public
Report of: Michael Cogher - Comptroller & City Solicitor	For Information
Report author: Nick Senior – Comptroller & City Solicitor's Department	

Summary

The purpose of this report is to provide an update on the Comptroller and City Solicitor's departmental risks as at 30 January 2018.

Recommendation(s)

The Committee is recommended to note the report.

Main Report

Background

1. The Audit and Risk Management Committee require departments to maintain a risk register using the Pentana risk management system and provide a quarterly risk management report to their respective committee.

Current Position

2. The departmental risks are summarised in Appendix 1.
3. Strategic and operational risks are reviewed by the C&CS Senior Management Team on a monthly basis.
4. The Committee are requested to note that a new Corporate Risk CR25 General Data Protection Regulations (GDPR) Project has been created in recognition of the risk arising from non-compliance with the GDPR Regulations due to come into force on 25 May 2018.

Conclusion

5. The Establishment Committee is requested to note this report.

Appendices

- Appendix 1 – Comptroller and City Solicitor's Departmental Risk Register

Nick Senior

Business Manager, Comptroller and City Solicitor's Department

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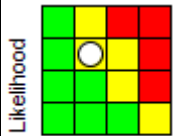
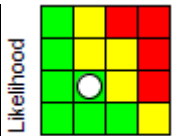
E: nick.senior@cityofLondon.gov.uk

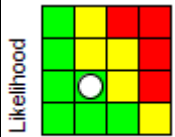
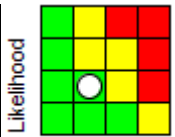


CCS Risk Register summary

Generated on: 08 February 2018

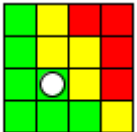
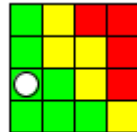



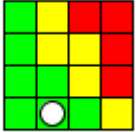
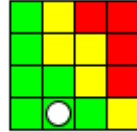
Risk No, Title, Department, Risk creation date	Description (Cause, Event, Effect)	Current Risk Score		Risk Owner	Risk update and risk update date	Target Risk Score		Target date	Current Risk score indicator
CR25 General Data Protection Regulation Project (previously CCS 006) Comptroller & City Solicitors Creation Date 01-Dec-2017	Cause: Insufficient resources, inadequate corporate/departamental systems and procedures are established and tested which meet the additional requirements of GDPR legislation. Event: CoL is unable to comply with GDPR requirements - poor, non-secure and non-compliant processing of personal data by the 25 May 2018 when GDPR is live. Effect: CoL exposed to adverse publicity, reputational damage, financial penalties imposed by the Information Commissioners Office. Increased volume of Subject Access Requests.	 Likelihood	12	Michael Cogher	The GDPR compliance project is progressing: • Additional Officer resource recruited to the Information Compliance Team to support GDPR project • Frequent project progress monitoring and action by the GDPR project team • Training has been deleivered to all Access to Information Network Representatives with subsequent drop in training sessions scheduled. • Member training sessions have been scheduled. • Mandatory online corporate GDPR training is in development • Policies have been developed and approved further policies being drafted • Record of Processing Activities - most departments have now completed the ROPA returns which are being analysed by the C&CS Information Team 08 Feb 2018	 Likelihood	4	18-May-2018	 No Change

Risk No, Title, Department, Risk creation date	Description (Cause, Event, Effect)	Current Risk Score		Risk Owner	Risk update and risk update date	Target Risk Score		Target date	Current Risk score indicator
CCS 002 Data Protection Compliance & loss of information assets Comptroller & City Solicitors Creation Date 04-Mar-2015	Cause - Failure to follow agreed procedures in compliance with Data Protection requirements. Event - Personal data breach Effect - Severe financial penalty, reputation damaged, breach of confidentiality		6	Michael Cogher	A new corporate risk CR25 in relation to the GDPR project has been created. C&CS are leading on the governance and advisory elements of this project so are well placed to understand and comply with the increased data protection requirements. 08 Feb 2018		4	31-May-2018	↔ No change

Risk No, Title, Department, Risk creation date	Description (Cause, Event, Effect)	Current Risk Score		Risk Owner	Risk update and risk update date	Target Risk Score		Target date	Current Risk score indicator
CCS 001 Recruitment and retention of experienced legal staff Comptroller & City Solicitors Creation Date 12-Feb-2015	Cause - Private sector legal firms and other local authorities may offer more attractive remuneration packages Event - Loss of critical expertise and competence Effect - Delivery of legal advice and documentation delayed, loss of income, assets exposed to higher risks		4	Michael Cogher	Continuing salary benchmarking has demonstrated that C&CS salaries are competitive, monitoring will continue. 08 Feb 2018		4	31-Mar-2018	↔ No Change
Risk No, Title, Department, Risk creation date	Description (Cause, Event, Effect)	Current Risk Score		Risk Owner	Risk update and risk update date	Target Risk Score		Target date	Current Risk score indicator
CCS 003	Cause - Lawyers not up to date with		4	Michael Cogher	C&CS Risk Management procedures were		4	31-Mar-2018	↓

Managing Legal Risk Comptroller & City Solicitors Creation Date 04-Mar-2015	law, poor communication, lack of supervision, agreed procedures not followed, file reviews not completed Event - physical and intellectual property assets at risk, court hearings missed, high risk matters not reported, inadequate advice provided, cases not progressed in a timely fashion Effect - financial penalty, loss of client confidence in the legal service, reputation				audited independently in June 2017 and were found to be highly compliant with the Law Society LEXCEL quality mark standard. Compliance with the standard is also tested internally. 22 Sep 2017				Decreased Risk Score
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Risk No, Title, Department, Risk creation date	Description (Cause, Event, Effect)	Current Risk Score		Risk Owner	Risk update and risk update date	Target Risk Score		Target date	Current Risk score indicator
CCS 005 Ability to access critical ICT systems - business continuity Comptroller & City Solicitors Creation Date 04-Mar-2015	Cause - Critical ICT systems not available in the event of a significant incident. Event - System accessibility failure off site. Effect - key officers unable to identify current legal work and access key legal documents.	Likelihood  Impact	4		The wider use of laptops and mobile devices has improved agile working opportunities has improved remote access to ICT systems 08 Feb 2018	Likelihood  Impact	2	31-Dec-2018	 No change

Risk No, Title, Department, Risk creation date	Description (Cause, Event, Effect)	Current Risk Score		Risk Owner	Risk update and risk update date	Target Risk Score		Target date	Current Risk score indicator
CCS 004 Successful operation of Oracle OPN Comptroller & City Solicitors Creation Date 04-Mar-2015	Cause - Oracle OPN replaced the Manhattan commercial property management and rent system Event - Continued operational difficulties caused by OPN Effect - If the application does not function as planned commercial income will not be invoiced on the due dates resulting in increased arrears	<div>Likelihood</div>  <div>Impact</div>	2	Nick Senior	Oracle OPN continues to function though functional shortcomings continue to be evident and hinder the efficiency of the finance team 08 February 2018	<div>Likelihood</div>  <div>Impact</div>	2	31-Mar-2018	↔

