



Audit and Risk Management Committee

Date: TUESDAY, 16 JULY 2019
Time: 2.00 pm
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members:

Alderman Ian Luder (Chairman)	Marianne Fredericks (Ex-Officio Member)
Alexander Barr (Deputy Chairman)	Alderman John Garbutt
Hilary Daniels (Deputy Chairman)	Kenneth Ludlam (External Member)
Randall Anderson	Paul Martinelli
Alderman Nick Anstee	Caroline Mawhood (External Member)
Chris Boden	Jeremy Mayhew (Ex-Officio Member)
Deputy Jamie Ingham Clark (Ex-Officio Member)	Andrien Meyers
Anne Fairweather	John Petrie

Enquiries: Chloe Rew
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Lunch will be served in Guildhall Club at 1:15 PM
NB: Part of this meeting could be the subject of audio or video recording

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES OF THE PREVIOUS MEETING**
To agree the public minutes of the meeting held on 7 May 2019.

For Decision
(Pages 1 - 8)

4. **OUTSTANDING ACTIONS OF THE COMMITTEE**
Report of the Town Clerk.

For Information
(Pages 9 - 10)

5. **COMMITTEE WORK PROGRAMME**
Report of the Town Clerk.

For Information
(Pages 11 - 12)

Financial Statements and External Auditor Reports

6. **2018-19 CITY FUND AND PENSION FUND FINANCIAL STATEMENTS - TO FOLLOW**
Report of the Chamberlain.

For Information

7. **BRIDGE HOUSE ESTATE ACCOUNTS - TO FOLLOW**
Report of the Chamberlain.

For Information

Internal Audit/ Corporate Anti-Fraud

8. **INTERNAL AUDIT UPDATE**
Report of the Head of Audit & Risk Management.

For Information
(Pages 13 - 28)

9. **ANTI-FRAUD AND INVESTIGATIONS - 2018/19 ANNUAL REPORT**
Report of the Head of Audit and Risk Management.

For Information
(Pages 29 - 38)

Risk Management

10. **CORPORATE RISK UPDATE**
Report of the Chamberlain.

For Decision
(Pages 39 - 90)

11. **DEEP DIVE RISK REVIEW**

- a) CR20 - Road Safety
Report of the Director of the Built Environment.

For Information
(Pages 91 - 98)

- b) CR16 - Information Security
Report of the Chamberlain.

For Information
(Pages 99 - 118)

12. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

13. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

14. **EXCLUSION OF THE PUBLIC**

MOTION – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

Item	Paragraph
15	3
16	3 & 7
17	2 & 3
18	3
21	2 & 3
22	2 & 3

For Decision

Part 2 - Non-Public Agenda

15. **NON-PUBLIC MINUTES OF THE PREVIOUS MEETING**

To agree the non-public minutes of the meeting held on 7 May 2019.

For Decision
(Pages 119 - 120)

16. **DEEP DIVE CR24 - OPERATIONAL SECURITY**

Report of the Town Clerk & Chief Executive.

For Information
(Pages 121 - 128)

17. **APPENDIX 3 TO ANTI-FRAUD AND INVESTIGATIONS - 2018/19 ANNUAL REPORT**

Non-public appendix to be read in conjunction with the report of the Head of Audit & Risk Management: Anti-Fraud and Investigations – 2018/19 Annual Report.

For Information
(Pages 129 - 132)

18. **APPENDIX 4 TO CORPORATE RISK UPDATE**

Non-public appendix to be read in conjunction with the report of the Chamberlain: Corporate Risk Update.

For Information
(Pages 133 - 134)

19. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

20. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

Part 3 - Confidential Agenda

21. **CONFIDENTIAL MINUTES**

To agree the confidential minutes of the previous meeting held on 7 May 2019.

For Decision

22. **APPENDIX 4 TO ANTI-FRAUD AND INVESTIGATIONS - 2018/19 ANNUAL REPORT**

Confidential appendix to be read in conjunction with the report of the Head of Audit and Risk Management: Anti-Fraud and Investigations – 2018/19 Annual Report.

For Information

23. **CONFIDENTIAL QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
24. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED DURING THE CONFIDENTIAL SESSION**

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AUDIT AND RISK MANAGEMENT COMMITTEE

Tuesday, 7 May 2019

Minutes of the meeting of the Audit and Risk Management Committee held at Guildhall, EC2 on Tuesday, 7 May 2019 at 2.00 pm

Present

Members:

Alderman Ian Luder (Chairman)
Alexander Barr (Deputy Chairman)
Randall Anderson
Anne Fairweather
Marianne Fredericks (Ex-Officio Member)
Alderman John Garbutt (in the Chair until Item 4)
Deputy Jamie Ingham Clark (Ex-Officio Member)
Kenneth Ludlam (External Member)
Caroline Mawhood (External Member)
Jeremy Mayhew (Ex-Officio Member)
Andrien Meyers
John Petrie

Officers:

Chloe Rew	- Town Clerk's Department
Alistair MacLellan	- Town Clerk's Department
Tom Conniffe	- Town Clerk's Department
Kate Smith	- Town Clerk's Department
Peter Kane	- Chamberlain
Paul Dudley	- Chamberlain's Department
Sean Green	- Chamberlain's Department
Philip Gregory	- Chamberlain's Department
Pat Stothard	- Head of Internal Audit and Risk Management
Michael Cogher	- Comptroller and City Solicitor
Paul Double	- City Remembrancer
Andrew Carter	- Director of Community and Children's Services
Alistair Sutherland	- Assistant Commissioner, City of London Police
Cecilie Booth	- City of London Police
Leigh Lloyd-Thomas	- External Auditor, BDO

1. **APOLOGIES**

It was proposed by Jeremy Mayhew that Alderman John Garbutt take the Chair.

Apologies were received from Hilary Daniels and Paul Martinelli.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

There were no declarations.

3. **COURT ORDER**

Members received the Order of the Court dated 25 April 2019.

4. **ELECTION OF THE CHAIRMAN**

Members elected a Chairman in accordance with Standing Order 29.

RESOLVED, that – being the only Member willing to serve, Alderman Ian Luder be elected as Chairman for 2019/20.

5. **ELECTION OF THE DEPUTY CHAIRMAN**

Members elected 1 Deputy Chairman in accordance with Standing Order 30, and 1 Deputy Chairman from the External Members, in accordance with a convention adopted by the Committee on 6 March 2018.

RESOLVED, that – being the only Members willing to serve, Mr. Alexander Barr (Court of Common Council Member) and Ms. Hilary Daniels (External Member) be elected as Deputy Chairmen for 2019/20.

6. **APPOINTMENT OF SUBCOMMITTEES**

Members considered a report of the Town Clerk which sought to elect 3-4 Members to serve on its Nominations Sub-Committee, one of which being an External Member, and to co-opt 2 Members to serve on the Police Performance and Resource Management Sub-Committee.

RESOLVED, that –

1. Being the only Members willing to serve, Mr. Randall Anderson, Mr. Jamie Ingham Clark, Mr. Kenneth Ludlam and Ms. Caroline Mawhood be appointed to the Nominations Sub-Committee for 2019/20. *(NB Members agreed to 2 external Members, Mr. Ludlam and Ms. Mawhood, being appointed to the Sub-Committee, as had been the case the previous year.)*
2. Being the only Members willing to serve, Mr. Kenneth Ludlam and Ms. Caroline Mawhood be co-opted to the Police Performance and Resource Management Sub-Committee for 2019/20.

7. **MINUTES OF THE PREVIOUS MEETING**

RESOLVED, that - the minutes of the meeting held on 12 March 2019 be approved as a correct record, subject to the following amendments:

- Page 12, para 7: The Head of Internal Audit clarified that an opinion will be given for work that has been completed since the previous Head of Internal Audit opinion (not only work completed in the 2018/19 Plan).
- Page 15, para 15: 'Members were concerned with the ten-year rotation of audit partners.

8. **OUTSTANDING ACTIONS OF THE COMMITTEE**

Members received the Committee's Outstanding Actions list, noting the items discharged on this agenda and that new items may be added as the meeting progressed.

- Regarding the Multi Academies Trust (MAT), the Chairman provided an update regarding a meeting held with the CEO and CFO of MAT clarifying the relationship between the MAT, co-sponsored academies and the City's audit functions.
- Regarding the Freedom of Information Requests for the City of London Police, the Committee received an update advising that the original backlog of requests at the time of the last audit had been completed. However, due to a long-term sickness and increase in demand, the backlog had grown to 460 applications, which are subject to a management plan. Additional resources had been allocated to facilitate their completion. Furthermore, it was reported that there were 2 vacancies for which recruitment was underway. A further report is to be presented in July.

9. **COMMITTEE WORK PROGRAMME**

Members received the Committee's Work Programme and noted the following changes:

- Annual Report to be brought to the Committee on 24 September 2019 (to be subsequently brought to the Court of Common Council on 10 October 2019);
- Deep Dive CR01: Resilience to be moved to 24 September 2019;
- Deep Dive CR20: Road Safety to be brought forward to 16 July 2019;
- Review of Risk Management Strategy to be brought to the Committee on 19 November 2019.
- Subsequent to the meeting, the Risk Challenge Session for the City Surveyor's was moved to January 2020, and the Risk Challenge Session for Guildhall School of Music and Drama will take place on 16 July 2019.

10. **ANNUAL GOVERNANCE STATEMENT 2018/19**

Members considered a joint report of the Town Clerk and the Chamberlain relative to the Annual Governance Statement 2018/19, presenting the annual summary and update of the City Corporation's governance and internal control framework.

RESOLVED, that Members –

1. approve the AGS set out in Appendix 1 for signing by the Chairman of the Policy and Resources Committee and the Town Clerk and Chief Executive, subject to the amendments agreed by the Chairman and Deputy Chairman;
2. note that the AGS will be published alongside the 2018/19 City Fund and Pension Funds Statement of Accounts;
3. note the future work programme in paragraph 94 of the AGS to improve the governance framework; and,
4. delegate authority to the Town Clerk and Chief Executive, in consultation with the Chairman and Deputy Chairman of this Committee, to amend the AGS for any significant events or developments relating to the governance arrangements that occur prior to the date on which the Statement of Accounts is signed by the Chamberlain.

11. **HEAD OF INTERNAL AUDIT OPINION AND ANNUAL REPORT 2018/19**

Members received a report of the Head of Audit & Risk Management relative to the Head of Internal Audit Opinion and Annual Report 2018/19.

RESOLVED, that – the report be received and its contents noted.

12. **INTERNAL AUDIT RECOMMENDATIONS FOLLOW-UP**

Members received a report of the Head of Audit & Risk Management relative to the Internal Audit Recommendations Follow-Up, which provided an update on the outcome of a recent follow-up exercise focused on red and amber priority recommendations due for implementation by 31 March 2019.

RESOLVED, that – the report be received and its contents noted.

****** Following this item, the Committee moved to a confidential session to discuss a staffing matter before resuming in public ******

13. **INTERNAL AUDIT CHARTER - UPDATE 2019**

Members considered a report of the Head of Audit & Risk Management relative to the Internal Audit Charter – Update 2019.

RESOLVED, that – the revised Internal Audit Charter be approved subject to the amendments agreed by the Chairman and Deputy Chairman.

14. RISK MANAGEMENT UPDATE

Members considered a report of the Chamberlain relative to the Risk Management Update, which provided the Committee with an update on the corporate and top red departmental risk registers.

RESOLVED, that Members–

1. note the Planning and Transportation Committee’s resolution of 18 March 2019;
2. confirm that corporate risk owners be requested to review risk descriptions. Any changes to these risk descriptions will be reported to the July 2019 meeting;
3. endorse the decision of the Summit Group that information management risk (CR29) be included on the corporate risk register;
4. note the risk status (corporate and departmental) of the information security risk (formerly CR16), to be further discussed at the next meeting; and,
5. note the risk report.

15. PLANNING AND TRANSPORTATION COMMITTEE RESOLUTION REGARDING CR20: ROAD SAFETY

Members received a resolution of the Planning and Transportation Committee requesting corporate risk CR20: Road Safety be reviewed, both in its description and rating.

RESOLVED, that – CR20: Road Safety be reviewed in description and its rating brought to 12. A Deep Dive of CR20 will take place at the next meeting on 16 July 2019, to which the Chairman of the Planning & Transportation Committee, the mover of the resolution and the risk owner will be invited.

16. DEEP DIVE RISK REVIEW

16 a) CR17 Safeguarding

Members received a report of the Director of Community and Children’s Services relative to the work undertaken to mitigate the risk CR17: Safeguarding.

RESOLVED, that – the report be received and its contents noted.

16 b) CR10 Adverse Political Developments

Members received a report of The Remembrancer relative to risk CR10: Adverse Political Developments and the steps taken to mitigate the risk of political developments which may damage the future status and functioning of the City Corporation.

Further discussion was carried out in the non-public session due to the sensitivity of information discussed.

RESOLVED, that – the report be received and its contents noted.

17. **REFERENCE FROM THE STANDARDS COMMITTEE**
Members did not receive a reference from the Standards Committee and the item was discharged.

18. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no questions.

19. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
The Chairman expressed his thanks to Pat Stothard for his dedicated work as Head of Internal Audit, as this will be his last meeting.

20. **EXCLUSION OF THE PUBLIC**
RESOLVED: That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

Item	Paragraph
21	3
22	3 & 5
23	3
25	1 & 3

21. **NON-PUBLIC MINUTES OF THE PREVIOUS MEETING**
RESOLVED, that – the non-public minutes of the previous meeting held 6 March 2019 be approved as a correct record.

22. **CR28: ACTION FRAUD RISK - APPENDIX FOR RISK MANAGEMENT UPDATE (ITEM 14)**
Members received the non-public appendix read in conjunction with the report of the Chamberlain at Agenda Item 14.

23. **NON-PUBLIC APPENDIX FOR DEEP DIVE: CR17 SAFEGUARDING (ITEM 16A)**
Members received the non-public appendix read in conjunction with the report of the Director of Community and Children’s Services at Agenda Item 16a.

24. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
There were no questions.

25. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There were three items of other business.

The meeting ended at 4.05 pm

Chairman

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AUDIT AND RISK MANAGEMENT COMMITTEE - Outstanding Actions - JULY 2019 update

Items from meeting held 7 May 2019			
Date Added	ITEM	Action	Officer and target date
07.05.2019	9. COMMITTEE WORK PROGRAMME	Annual Report to be brought to the Committee on 24 September 2019, to be subsequently submitted to the Court of Common Council on 10 October 2019.	<i>Officer: Chamberlain</i> <i>Date: 24 September 2019</i>
07.05.2019	12. INTERNAL AUDIT RECOMMENDATIONS FOLLOW-UP	The Committee Clerk to write to all Chairmen of Grand Committees regarding the risk ratings, recommendations and implementation of their relevant Chief Officers	<i>Officer: Committee Clerk</i> <i>Date: 16 July 2019</i> COMPLETED
07.05.2019	16A. DEEP DIVE – SAFEGUARDING	Committee Clerk to write to Safeguarding Subcommittee regarding the Safeguarding deep dive.	<i>Officer: Committee Clerk</i> <i>Date: 16 July 2019</i> COMPLETED
07.05.2019	25. ANY OTHER BUSINESS	The City of London Police Commissioner to provide clarification on the recruitment matter	<i>Officer: City of London Police Commissioner</i> <i>Date: 16 July 2019</i>

Items from meeting held 12 March 2019			
Date Added	ITEM	Action	Officer and target date
14.03.2019	3. MINUTES – MATTERS ARISING	City Solicitor and Procurement to provide joint report regarding the delays in signing the catering contract and the risks this poses to the City Corporation.	<i>City Solicitor</i> <i>Date: 16 July 2019</i>
	3. MINUTES – MATTERS ARISING	City Solicitor to inform the Committee Clerk when the contract is signed and a circulation to Members is to be sent.	<i>City Solicitor</i> <i>Committee Clerk</i> <i>Date: TBC</i>
14.03.2019	ANY OTHER BUSINESS	Police Commissioner to provide update of Freedom of Information request areas to be presented to a future Committee meeting.	<i>City of London Police Commissioner</i> <i>Date: TBC</i>

AUDIT AND RISK MANAGEMENT COMMITTEE - Outstanding Actions - JULY 2019 update

Items from meeting held 6 November 2019			
Date Added	ITEM	Action	Officer and target date
06.12.2018	9. NEW CORPORATE RISK – BREXIT	Each Department to carry out risk assessment of the impact of Brexit.	<i>All departments/Chamberlain Ongoing</i>

Audit & Risk Management Committee - Work Programme: January – November 2019

7 May 2019	16 July 2019	24 September 2019	19 November 2019	28 January 2020
Financial Statements and External Auditors				
	Draft City Fund and Pension Fund accounts Bridge House Estate Accounts Annual Private Meeting of Members with External Auditors	City's Cash Accounts Annual report		
Risk Management (Regular update reports, Deep Dive Risk Reviews and Independent Risk Challenge)				
1. CR 17 - Safeguarding 2. CR10 - Adverse Political Developments <u>Risk Challenge:</u> Mansion House/ Central Criminal Court	1. CR20 – Road Safety 2. CR24 – Operational Security <u>Risk Challenge:</u> GSMD	1. CR01 – Resilience (TBC – subject to TC availability) 2. CR21 - Air Quality <u>Risk Challenge:</u> Community and Children's Services	1. CR09 - Health and Safety 2. CR27 - Organisational Change (TBC) <u>Risk Challenge:</u> Open Spaces	1. 2. <u>Risk Challenge:</u> City Surveyors
Risk Update report	CR16 Information Security Risk Update Report	Risk Update report	Review of Risk Management Strategy	

7 May 2019	16 July 2019	24 September 2019	19 November 2019	28 January 2020
Internal Audit/Corporate Anti-fraud				
Head of Audit Annual Audit Opinion Internal Audit Recommendations Follow Up Anti-Fraud Update Internal Audit Charter review Annual Private Meeting of Members with Head of Internal Audit	Internal Audit Update Anti-Fraud & Investigations	Internal Audit Recommendations Follow up	Internal Audit Update Anti-Fraud Update	
Governance				
Annual Governance Statement (Town Clerk)				
External Inspections/OFSTED Reports etc				
		HMIC (City of London Police)		

Committee:	Date:
Audit and Risk Management Committee	16 July 2019
Subject: Internal Audit Update Report	Public
Report of: Head of Audit and Risk Management	For Information

Summary

This report provides an update on internal audit activity since the last Internal Audit Update Report presented to the March 2019 Committee meeting.

Work on the 2018-19 internal plan is nearing completion, with 60 reports in the Plan; to 17th June 2019, 89% of the plan has been completed to a minimum of draft report stage, with a further 3% of audit reports under review. Fieldwork is on-going in respect of the final 8% of the annual plan, including many audits which are nearing completion.

For those audits at fieldwork stage, there have been delays in delivery of the Plan due to a number of postponements of audit assignments until Q1, difficulties obtaining required information for audit fieldwork and availability management resources, as well as staff absence within the Internal Audit Team.

Audit work has commenced for 2019/20, with one report issued in draft and one draft report under review. Fieldwork and planning of audits is underway for 22% of the Audit Plan.

The Corporate Follow-Up forward plan has been defined and is set out below. The proposed frequency of follow-ups has been increased to promote regular review of recommendations implementation by departmental management and to encourage the treatment of recommendation tracking as a 'business as usual' activity.

Recommendation

- That this report is noted.

Main Report

Background

1. This report sets out internal audit activity since the March 2019 Internal Audit Update Report and the opinion of the Head of Audit and Risk Management in relation to the adequacy and effectiveness of the control environment.

Internal Audit Delivery

2. Work on the 2018-19 internal plan is progressing, with 60 reports in the Plan; to 17th June 2019, 89% of the plan has been completed to a minimum of draft

report stage, with a further 3% of audit reports under review. Fieldwork is ongoing in respect of 8% of the annual plan, including many audits which are nearing completion. Full details of plan progress for 2018-19 are included within **Appendix 1**.

3. Of the five audits (8%) at fieldwork stage, there have been delays in delivery of the audits due to the following:
 - Postponement of the CoLP Plan until completion of the Key Financial Controls audit;
 - Postponement of audit assignments until Q1, at the request of the client departments;
 - Delays in receipt of information at audit fieldwork stage;
 - Issues with availability of management resources to progress audits, and
 - Internal Audit staff absence.
4. Twenty-one audits have progressed to Final Report stage since the March 2019 meeting, comprising four Red assurance reviews and 14 Amber assurance reviews.
5. Member Briefings have been circulated in respect of finalised audits and contain assurance rating information, details of the key conclusions and high priority recommendations arising from the audit, as well as the accompanying management responses. Additionally, summary outcomes are shown below for the red recommendations for the four Red audits finalised since the March 2019 meeting of this Committee. The following table sets out the assurance rating and a breakdown of the number of recommendations made by priority for these audits.

Audit	Assurance	Red	Amber	Green	Total
BARBICAN - STRATEGIC PLANNING	AMBER	0	2	0	2
CHB - PAYROLL	AMBER	0	1	3	4
CLS – CYBER SECURITY	RED	2	11	0	13
CORP – SAFEGUARDING GOVERNANCE	N/A	N/A	N/A	N/A	N/A
DCCS – ADULT SKILLS & EDUCATION	RED	4	5	4	13
DCCS – MENTAL HEALTH PROVISION	AMBER	0	3	0	3
GSMD – STRATEGIC PLANNING	AMBER	0	2	2	4
M&S – LICENSING DATABASE	AMBER	0	2	2	4
CORP – SUPPLIERS FINANCIAL HEALTH & RESILIENCE	AMBER	0	4	2	6
CORP – COMMERCIAL MANAGER SCORECARD PROCEDURES	AMBER	0	6	4	10
TC – LMA – COLLECTION MANAGEMENT	AMBER	0	4	1	5
TC – EDO PROGRAMMES AND PROJECTS	AMBER	0	4	1	5
CHB – IT CHANGE MANAGEMENT	AMBER	0	1	1	2
CHB – PENSIONS (CITY)	GREEN	0	1	0	1
CHB – PENSIONS (CoLP)	GREEN	0	1	0	1
DCCS – MENTAL HEALTH PROVISION	AMBER	0	3	0	3
OS – PERFORMANCE MEASURES	AMBER	0	2	2	4
MH – CATERING & HOSPITALITY CONTRACT	AMBER	0	5	0	5
MH – INCOME & EXPENDITURE	RED	3	8	2	13

DBE – CIL & S106	RED	1	7	5	13
CoLP – KEY FINANCIAL CONTROLS ADDITIONAL TESTING	AMBER	0	5	0	5
	TOTAL	10	77	29	116

6. The ten red priority recommendations, all of which were agreed by management, relate to the following areas:

CLS Cyber Security

- The School should develop a plan for addressing the recommendations of the recent penetration test at the earliest opportunity, prioritising any corrective action according to the risk presented.
- The School should either lock down USB drives so they cannot be used or, if their use is essential for business purposes, enforce USB encryption prior to data transfer.

DCCS Adult Skills & Education

- The Head of Adult Skills, Education and Apprenticeships should put arrangements in place to demonstrate the accuracy and completeness of Erasmus funding return submissions. For each funding return submitted the Head of Adult Skills, Education and Apprenticeship should ensure that the returns are supported by detailed calculations and supporting evidence e.g. timesheets, and receipts.
- The Director of Community and Children's Services should ensure that appropriate measures are introduced to ensure that funding agreements are only signed by those members of staff with appropriate authority to do so.
- The Director of Community and Children's Services should:
 - (i) Ensure that Adult Education Service and Apprenticeship staff receive appropriate training on the requirements of the City's Central Procurement processes.
 - (ii) Instigate monitoring arrangements to ensure that the future procurement activity is undertaken in accordance with the Procurement Code 2015.
- The Director of Community and Children's Services should ensure that appropriate arrangements are in place for identifying the need for and approving formal variations across the department's contracts.

Mansion House – Income & Expenditure

- A procedure note should be drawn up which clearly defined roles and responsibilities and the processes that should be followed by the Events and Finance and Administration officers in respect of:

- Capturing details of bookings, including pricing agreements and provision of this information to the Finance and Administration Team;
- Raising of invoices;
- Reconciliation between room hire's bookings and income invoiced and collected; and
- Chasing of overdue income.

This procedure should help ensure appropriate separation of duties and should be made available to relevant staff in both the Finance and Administration and the Events offices.

- Management should ensure that:
 - Separation of duties is established between the organising of MH Group Tours and the collection of income made as a result.
 - Alternative options for income collection are explored and cash payments avoided, thereby helping to ensure safer and cost-effective mechanisms for group income collection.
 - Advance payments are required at tour booking stage.
- Management should ensure that appropriate processes are put in place for the setting up of charges, recording, collection, banking and reconciliation of CCC tours income. These should be approved at the appropriate level and circulated to relevant staff as a matter of priority.

DBE – CIL and S106

- Budget monitoring reports should be produced on a regular basis on all S106 agreements. For each agreement, the budget monitoring report should highlight the income collected for each type of fund. Furthermore, the reports should also outline which projects each fund has been allocated to and how much is yet to be allocated. The report should also highlight which funds have been actually spent compared to the allocated sum.

7. Audit work has commenced for 2019/20, with one report issued in draft and one draft report under review. Fieldwork and planning of audits is underway for 22% of the Audit Plan. Full details of plan progress for 2019-20 are included within **Appendix 2**.

Recommendations Implementation

8. Internal Audit has been actively looking at ways to streamline the follow-up approach and reduce the impact upon available resource for Audit Plan delivery. As previously proposed, Internal Audit will be undertaking more regular follow-up of high priority recommendations to promote regular monitoring of implementation by departmental Senior Management and reduce the perception that this activity as a 'bolt on'; recommendation tracking should be part of business as usual arrangements.

9. The majority of client departments have nominated Business Users who have been trained to access the Recommendation Tracking module within the software used by Internal Audit and can directly input implementation progress updates and attach associated evidence. It is anticipated that direct use of the module by departments will provide useful management information, facilitate the regular review of recommendation statuses and enable prompt responses to be provided to Internal Audit for Corporate Follow-Up purposes.
10. The timing of Corporate Follow-Up exercises has been defined, communicated to all departments, and the outcomes will be reported to this Committee, as set out below.

Internal Audit Follow-Up Activity	Recommendations within Scope*	A&RMC Meeting
August 2019	31/07/2019	September 2019
October 2019	30/09/2019	November 2019
December 2019	30/11/2019	January 2020
February 2020	31/01/2020	March 2020
May 2020	30/04/2020	June 2020

‘*’ Target implementation dates up to and including the dates set out.

Conclusion

11. Internal Audit’s opinion of the City’s overall internal control environment is that it remains adequate and effective although some areas of the financial, operational and IT frameworks, particular in relation to the Red reports noted above, do require strengthening by management as identified in the Member Briefings circulated to members of this Committee.

Appendices

Appendix 1 Internal Audit Delivery 2018-19

Appendix 2 Internal Audit Delivery 2019-20

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Internal Audit Delivery 2018-19 (as at 17-06-19)

Progress against the plan – Summary

No of Reviews	Planning/ToR issued	Fieldwork	Report under Review	Draft Report	Final Report (Audit Complete)
60	0	5	2	25	28
100%	0%	8%	3%	42%	47%

Audit status definitions: 'Planning/ToR issued' – audit being planned or ToR issued; 'Fieldwork' – audit terms of reference finalised and fieldwork underway/complete, 'Draft Report' – draft report issued and management response awaited, and 'Final Report' – management response received to the draft report and audit completed.

Progress against the plan – Detail

No	Department	Main Audit Review	Status	Assurance	Recommendations Made				Recommendations Agreed				
					R	A	G	Total	R	A	G	Total	
1	Corporate Wide	IR35 – Use of Consultants & Specialists	Draft Report										
2	Corporate Wide	GDPR Readiness	Final Report	Red	2	0	5	7	2	0	5	7	
3	Corporate Wide	Suppliers Financial Health/Resilience	Final Report	Amber	0	4	2	6	0	4	2	6	
4	Corporate Wide	Commercial Manager Scorecard Procedures	Final Report	Amber	0	6	4	10	0	6	4	10	
5	Corporate Wide	Budgetary Control	Draft Report										
6	Corporate Wide	Follow-up Exercise	Complete	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
	Corporate Wide	Change Control (Mazars)	Defer to 2019/20										
	Corporate Wide	Highways Repairs and Maintenance	Defer to 2019/20										
7	Corporate Wide	Programmed Repairs and Maintenance	Final Report	Amber	1	2	1	4	1	2	1	4	

No	Department	Main Audit Review	Status	Assurance	Recommendations Made				Recommendations Agreed				
					R	A	G	Total	R	A	G	Total	
8	Corporate Wide	Operational Property Rent & Service Charges	Draft Report										
	Corporate Wide	Project Change Control	Defer to 2019/20										
9	Corporate Wide	Safeguarding Governance	Final Report	N/A	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
10	Corporate Wide	Safer Recruitment	Draft Report										
11	Corporate Wide	Investment Properties Commercial Leases	Draft Report										
	Town Clerks	City Bridge Trust – Grant Application Governance	Defer to 2019/20										
	Town Clerks	Management of Freedom of Information Requests	Defer to 2019/20										
12	Town Clerks	Guildhall Club Accounts	Final Report	Green	0	0	0	0	0	0	0	0	0
13	Town Clerks	LMA – Collection Management	Final Report	Amber	0	4	1	5	0	4	1	5	5
14	Town Clerks	Sustainability	Fieldwork										
15	Town Clerks	EDO – Programmes and Projects	Final Report	Amber	0	4	1	5	0	4	1	5	5
16	Chamberlains	Payroll	Final Report	Amber	0	1	3	4	0	1	3	4	4
17	Chamberlains	Main Accounting System GP/AR/AP	Draft Report										
	Chamberlains	IT Digital Content Management (Mazars)	Defer to 2019/20										
18	Chamberlains	IT Project Management – Governance and Process	Draft Report										
19	Chamberlains	IT Mobile Devices	Draft Report										
20	Chamberlains	IT Business Continuity & Disaster Recovery	Draft Report										
21	Chamberlains	IT Asset Management	Draft Report										
22	Chamberlains	IT Change Management	Final Report	Amber	0	1	1	2	0	1	1	2	2
	Chamberlains	Pension Fund Investment Management	Defer to 2019/20										
23	Chamberlains	Pensions Administration – City	Final Report	Green	0	1	0	1	0	1	0	1	1
24	Chamberlains	Pensions Administration – CoLP	Final Report	Green	0	1	0	1	0	1	0	1	1

No	Department	Main Audit Review	Status	Assurance	Recommendations Made				Recommendations Agreed				
					R	A	G	Total	R	A	G	Total	
	Chamberlains	Process Maps	Defer to 2019/20										
	Chamberlains	CBIS (ORACLE) Property Module	Defer										
25	DCCS	Mental Health Provision	Final Report	Amber	0	3	0	3	0	3	0	3	
26	DCCS	Asylum Seekers	Draft Report										
27	DCCS	Early Help Strategy	Draft Report										
28	City Surveyors	Facilities Management SBR Review	Draft Report										
29	Open Spaces	Performance Measures	Final Report	Amber	0	2	2	4	0	2	2	4	
30	Built Environment	DBE Project Team	Draft Report										
31	Built Environment	Business Continuity & Disaster Recovery	Draft Report										
32	Markets	Licensing – Electronic Database	Final report	Amber	0	2	2	4	0	2	2	4	
	City Solicitors	Income and Expenditure	Defer to 2019/20										
	Remembrancers	Staff Training	Defer to 2019/20										
33	Mansion House	Income and Expenditure	Final Report	Red	3	8	2	13	3	8	2	13	
	City Police	Police Overtime	Defer to 2019/20										
	City Police	Police Performance Measures	Deleted										
34	City Police	Interpreters Fees	Draft Report										
	City Police	Police Premises Expenditure	Defer to 2019/20										
35	City Police	Police Procurement Contract Management	Draft Report										
	City Police	Financial Controls – Procurement Cards – Petty Cash – Expense Claims	Defer to 2019/20										
36	City Police	Front Desks	Draft Report										
37	Barbican Centre	Strategic Planning, Monitoring & Income Generation	Final Report	Amber	0	2	0	2	0	2	0	2	

No	Department	Main Audit Review	Status	Assurance	Recommendations Made				Recommendations Agreed				
					R	A	G	Total	R	A	G	Total	
38	Barbican Centre	IT Projects (CRM, Agile Working, Ticketing System)	Draft Report under Review										
39a	Barbican Centre	Artistic Event Contracts	Fieldwork										
39b	Barbican Centre	Artistic Events: Decision-Making & Evaluation	Fieldwork										
39c	Barbican Centre	Commercial Events: Contracting, Decision-Making & Evaluation	Fieldwork										
40	Barbican Centre	Financial Monitoring & Income Generation	Draft Report										
41	Barbican Centre	Fraud Risk Management	Draft Report										
42	Guildhall School	Student Support (Student Affairs)	Final Report	Amber	0	10	0	10	0	10	0	10	
43	Guildhall School	Strategic Planning	Final Report	Amber	0	2	2	4	0	2	2	4	
	Guildhall School	Budget Setting and Financial Management	Defer to 2019/20										
44	Guildhall School	Accommodation Strategy	Fieldwork										
45	Guildhall School	Income Generation	Draft Report under Review										
46	Guildhall School	Academic Programme Development	Fieldwork										
47	CLS	Health and Safety	Draft Report										
48	CLS	Cyber Security	Final Report	Red	2	11	0	13	2	11	0	13	
49	CLSG	Cyber Security	Draft Report										
50	CLSG	Budget Setting and Monitoring	Draft Report										
51	CLSG	Internal Controls	Draft Report										
52	CLFS	Cyber Security	Final Report	Red	3	11	0	14	3	11	0	14	
53	DCCS	Adult Education Skills Service Contract Arrangements	Final Report	Red	4	5	4	13	4	5	4	13	
54	Built Environment	CIL & Section 106 Funding	Final Report	Red	1	7	5	13	1	7	5	13	
55	City Police	Key Financial Controls	Final Report	Red	3	10	0	13	3	10	0	13	
56	City Police	Key Financial Controls – additional testing	Final Report	Amber	0	5	0	5	0	5	0	5	

No	Department	Main Audit Review	Status	Assurance	Recommendations Made				Recommendations Agreed				
					R	A	G	Total	R	A	G	Total	
57	Corporate Wide	City Police Accommodation Programme	Draft report										
58	Mansion House	Catering and Hospitality Contract	Final Report	Amber	0	5	0	5	0	5	0	5	
59	Open Spaces	Financial Management	Final Report	Amber	0	3	5	8	0	3	5	8	
60	City Police	Police Accommodation 2	Fieldwork										
TOTAL					16	93	34	143	16	93	34	143	

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Internal Audit Work 2019-20 (as at 17-06-19)

Progress against the plan – Summary

No of Reviews	Not started	Planning/ToR issued	Fieldwork	Report under Review	Draft Report	Final Report (Audit Complete)
70	53	11	4	1	1	0
100%	76%	16%	6%	1%	1%	0%

Audit status definitions: 'Planning/ToR issued' – audit being planned or ToR issued; 'Fieldwork' – audit terms of reference finalised and fieldwork underway/complete, 'Draft Report' – draft report issued and management response awaited, and 'Final Report' – management response received to the draft report and audit completed.

Progress against the plan – Detail

No	Department	Main Audit Review	Status	Assurance	Recommendations Made				Recommendations Agreed				
					R	A	G	Total	R	A	G	Total	
1	CORP	CORPORATE-WIDE CHANGE CONTROL											
2	CORP	PROJECT MANAGEMENT											
3	CORP	GDPR COMPLIANCE	ToR										
4	CORP	CORPORATE-WIDE RISK MANAGEMENT											
5	CORP	CORPORATE FOLLOW-UP EXERCISES											
6	CORP	CORPORATE-WIDE HIGHWAYS REPAIRS AND MAINTENANCE CONTRACT											
7	CORP	FIRE SAFETY RISK MANAGEMENT											
8	CORP	ASSET MANAGEMENT											
9	CORP	PROJECTS CHANGE CONTROL PROCESS											

Committee(s)	Dated:
Audit and Risk Management Committee	16 July 2019
Subject: Anti-Fraud & Investigations – 2018/19 Annual Report	Public
Report of: Head of Audit & Risk Management	For Information
Report author: Chris Keesing – Anti-Fraud Manager	

Summary

This report provides Members with an update on the activity of the Anti-Fraud and Investigation team during the 2018/19 reporting year. It also provides Members with an update against our key anti-fraud initiatives.

In total 43 investigations, across all disciplines, were completed during 2018/19, with an associated value of £602,188.

25 successful tenancy fraud outcomes were secured during 2018/19, comprising of 16 cases where tenancies were surrendered following investigation, three criminal prosecutions, one civil recovery case, four housing application frauds and one right to buy fraud.

Where criminal and/or civil action was successful in tenancy fraud cases during 2018/19, £8,352 in costs were awarded and £36,268 was secured under Proceeds of Crime action.

Our support for the housing divisions' tenancy audit programme has resulted in the review of 105 referrals, with one leading to recovery of a property and a further 45 still under investigation.

A total of 14 corporate fraud and/or conduct investigations were concluded during the 2018/19 reporting year with an associated value of £61,613, whilst nine whistleblowing referrals were concluded during the same period.

The National Fraud Initiative (NFI) matches were released in January 2019 and work is underway to review and investigate those matches where fraud has been identified. 214 matches have been reviewed so far, and to date, two frauds have been confirmed with a value of £6,480.

The team recently participated in an NFI pilot exercise, where NFI datasets were matched against HMRC data to identify fraud. Ten cases reviewed so far from the pilot are expected to result in successful outcomes and our work has supported the Cabinet Office's business case for rolling out data matching against HMRC data for all NFI participants, nationwide.

Work to join the London Counter Fraud Hub has progressed well and we expect to be one of the first London authorities to onboard to the hub.

Recommendation(s)

- Members are asked to note the report.

Main Report

Background

1. This report provides Members with an update on the activity of the Anti-Fraud and Investigation team during the 2018/19 reporting year. It also provides Members with an update against our key anti-fraud initiatives.

Investigation Activity Summary

2. An analysis of the number of cases investigated during the 2018/19 reporting year has been included as Appendix 1 to this report, showing all fraud types along with the value of frauds detected. The associated value of identified fraud from the 43 completed investigations during 2018/19 amounts to £602,188.

Social Housing Tenancy Fraud

3. Social housing tenancy fraud remains a key fraud risk area for the City. The team provides full investigative support across all aspects of housing, from initial applications, to the investigation of tenancy breaches and right to buy screening. During the reporting year, 25 successful outcomes have been secured, including the conclusion of two criminal prosecution cases at Inner London Crown Court, another at the City of London Magistrates Court and a defended possession case at Clerkenwell and Shoreditch County Court. The associated value of these cases is £540,000.
4. In the cases mentioned above, where criminal and/or civil action was successful, £8,352 in costs were awarded, and £36,268 was secured under Proceeds of Crime action. The prosecution costs in these cases was greater than the amounts awarded to the City, and whilst costs submissions are made in each case, it is at the discretion of the courts as to whether full, partial or nil costs are awarded.
5. A summary of our work in this area, during 2018/19, is detailed in Appendix 2 to this report.
6. Where illegal occupation of City housing stock is identified and recovered, the tenancies have now been re-let to those in greater need of affordable housing.
7. The volume of Right to Buy (RTB) applications referred to the team for screening has dropped considerably. Through liaison with the Home Ownership Manager, we understand that there has been a significant reduction in RTB applications from tenants during 2018/19, this has resulted in a drop in identified RTB fraud to one case.

8. Case studies detailing several successful social housing tenancy fraud cases has been provided at Appendix 3.

Tenancy Audit

9. The Anti-Fraud team supported the Housing Division with the full tenancy audit programme undertaken throughout 2018/19. Where tenancy fraud concerns were identified by visiting officers, these cases were referred to the team for investigation. In total 105 cases were referred to the team, and work continues to review and investigate a number of these referrals. A summary of our work to date in this area can be found below:

Tenancy Audit referrals received	105
Tenancy Audit referrals closed – no fraud	58
Fraud identified and property recovered	1
Fraud identified and case with C&CS for consideration of further action	1
Cases still under investigation	45
Total	105

Corporate Anti-Fraud & Investigation Activity

10. Corporate investigations are defined as fraud, corruption or conduct cases which relate to employee fraud or conduct, or other third-party fraud. A total of 14 corporate investigations were concluded during the 2018/19 reporting year with an associated value of £61,613. Where Corporate investigations identify wrongdoing by staff, we support Senior Management and colleagues in HR to take appropriate action under the City’s disciplinary procedure.
11. Case studies detailing several successful Corporate investigation cases has been provided at Appendix 4.

Whistleblowing

12. The City’s Whistleblowing Policy identifies the Head of Audit & Risk Management as one of the main contacts for reporting a concern. The number of referrals received via whistleblowing channels is relatively low; however, when referrals are received, they are generally of high significance leading to further investigation.
13. During the 2018/19 reporting year, ten whistleblowing referrals (as defined in the policy) have been received. Nine cases were concluded during 2018/19, whilst a further complex case remains subject to investigation by the team.

National Fraud Initiative (NFI)

14. The NFI is a statutory bi-annual exercise, managed by the Cabinet Office and designed to identify fraud and error across departments ranging from housing, benefits and employment, through to pensions and duplicate payments. Data

matches for the current exercise were released in January 2019 and work is underway by the team and by departmental colleagues to review the matches. In total 5,354 matches were received, including 4,516 creditor matches that have traditionally been considered low risk to the City. A sample of these matches will be reviewed by the Accounts Payable team over the coming months.

15. Of the remaining 838 matches, 214 have been investigated and closed with no further action, whilst a further 47 are subject to ongoing investigation. Two frauds have been confirmed with an associated value of £6,480. The team continues to review, and support departmental review, of NFI matches as appropriate.

National Fraud Initiative (NFI) Pilot Exercise

16. The Anti-Fraud team were one of ten authorities to participate in an NFI pilot exercise, whereby several City of London datasets (Housing, Housing Benefit, Council Tax Support, Payroll, Direct Payments) were matched against HMRC data. The use of HMRC data for NFI matching purposes was permissible under the Digital Economy Act 2017, and it was, therefore, necessary, and important, for pilot authorities to work closely with the NFI team to feedback findings to demonstrate the value of the data-matching and justify roll-out to all NFI participants.
17. The City received a total of 250 additional matches as a result of the NFI pilot exercise. To date, 78 high risk Tenancy, Direct Payment and Payroll matches have been reviewed, resulting in 10 cases where successful outcomes are expected. The remaining 172 lower risk matches are subject to investigation.
18. The results from the City's participation in the NFI Pilot, along with that of the other nine pilot authorities, has supported the Cabinet Office's business case to roll-out the HMRC data-matching to NFI participants, nationwide.

London Counter Fraud Hub (LCFH)

19. Members will recall supporting the City's intention to onboard to the LCFH in November 2018. The City has continued to work closely with CIPFA and LB Ealing (as lead authority) to prepare for joining the hub and subject to some final enquiries, we aim to be in a position to become one of the first London authorities to onboard. Progress will be reported to Members as part of future Anti-Fraud & Investigation update reports.

Conclusion

20. The team continue to provide a professional and robust anti-fraud and investigation service across the organisation. 43 investigations across all disciplines were completed during 2018/19, with an associated value of £602,188. Tenancy fraud continues to be high risk and 25 successful results were secured in this area during the reporting year, with three successful prosecutions and one successful civil possession cases secured. £8,352 in costs was awarded and £36,268 was secured under Proceeds of Crime action in these four cases.

21. The team supported the housing divisions tenancy audit programme, receiving 105 referrals of suspected tenancy fraud, with 58 cases reviewed to date, one property has been recovered and one case is with the Comptroller and City Solicitor for consideration of further action. The remaining 45 referrals are subject to further review.
22. NFI matches were released in January 2019; 214 matches have been investigated to date, with two frauds confirmed with a value of £6,480. The team also participated in an NFI pilot exercise whereby datasets were matched with HMRC data to identify fraud. This supported a successful business case by the Cabinet Office to roll-out HMRC matches to NFI participants, nationwide.
23. Work is progressing well on preparations for joining the London Counter Fraud Hub and we expect to be one of the first London authorities to onboard to the hub.

Appendices:

Appendix 1: Analysis of cases investigated during 2018/19

Appendix 2: Housing tenancy fraud caseload 2018/19

Appendix 3: Social housing tenancy fraud case studies 2018/19 (non-public appendix)

Appendix 4: Corporate Investigations case studies 2018/19 (confidential appendix)

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Appendix 1 - Analysis of the number of cases investigated during the reporting year 2018/19 vs 2017/18.

1. The chart below provides a detailed analysis of the number of completed investigations, during 2018/19, against the previous reporting year, showing all fraud and investigation types along with the value of investigated cases, including where these can be quantified, the value of corporate and whistleblowing investigations.
2. The nature of the concerns raised under the City's whistleblowing channels mean that not all investigations completed under this discipline result in a financial value, as other outcomes such as disciplinary action, or control environment recommendations result from our whistleblowing investigations.

Activity	Completed Investigations 2017/18	Investigation Value (£'s) 2017/18		Completed Investigations 2018/2019	Investigation Value (£'s) 2018/19
Social Housing Tenancy Fraud ¹	16	288,000		20	360,000
Right to Buy ²	7	756,000		1	108,000
Housing Application Fraud ¹	5	90,000		4	72,000
Disabled Parking	1	575		1	575
Corporate Investigations ³	15	35,762		14	61,613
Council tax investigations	1	103		0	Nil
Whistleblowing Referrals	5	Nil		9	Nil
Total	50	1,170,440		43	602,188

Notes:

¹ Successful possession gained, and housing application fraud identified valued at £18,000 per property/application, in-line with nationally accepted values associated with social housing tenancy fraud.

² RTB discount value: £108,000 2018/19, per property.

³ Corporate Fraud Investigations include cases of fraud, corruption, theft or conduct investigated directly by Internal Audit and/or investigation supported by Internal Audit.

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Appendix 2 – Housing Tenancy Fraud Caseload Analysis 2018/19 vs 2017/18

Housing Tenancy Fraud Case Referrals	April 2017 to March 2018	April 2018 to March 2019
Housing tenancy fraud referrals received in current year	51	55
Right to buy referrals received in current year	23	21
Housing application referrals received in current year	13	5
Cases carried forward from previous year (all disciplines)	23	14
Total	110	95
Cases/Referrals currently under investigation		
Cases/referrals currently under investigation	14	13
Cases/referrals closed with no further action	59	56
Cases with Comptroller & City Solicitor for prosecution	3	1
Cases with Comptroller & City Solicitor for civil recovery	3	0
Cases with City Police for Financial Investigation	2	0
Cases where possession order granted	0	1
Cases where successful possession gained ¹	16	16
Cases where successful prosecution action taken	1	3
Cases where fraudulent application identified	5	4
Right to buy fraud successfully identified	7	1
Total	110	95
Value where successful possession gained, housing application cancelled or right to buy fraud identified ²		
	£1,134,000	£540,000
Notes:		
¹ Cases where successful possession has been gained will be considered for criminal action where suitable, and where offences committed are serious enough to warrant proceedings under the Prevention of Social Housing Fraud Act 2013 and/ or the Fraud Act 2006.		
² Successful possession gained value of £18,000 per property sourced from Audit Commission value of national average temporary accommodation costs to Local Authorities for one family. RTB discount value 2018/19, per property..		

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Agenda Item 10

Committee:	Date:
Audit and Risk Management Committee	16 July 2019
Subject: Corporate Risk Update	Public
Report of: The Chamberlain	For Decision
Report Author: Paul Dudley, Corporate Risk Manager	

Summary:

This report provides the Committee with an update on the corporate and top red departmental risk registers. Both these registers have been reviewed by the Chief Officer Risk Management Group (CORMG) on the 4 June 2019 and Summit Group on 25 June 2019.

A total of 334 risks (343 in April 2018) have been identified by departments providing a wide range of risks that may affect service delivery.

There are currently 15 (13 in April 2019) corporate risks included on the corporate risk register of which there are four red and 11 amber risks. Two corporate risks have changed current risk score – CR16 information security risk from an amber 8 to an amber 12 and CR20 from an amber 12 to a red 16.

The Director of Built Environment has revised the CR20 Road Safety risk description and current/target risk scores following representations by the Planning and Transportation Committee to the Audit and Risk Management Committee on 7 May 2019. Summit Group reconfirmed the redrafted CR20 Road Safety as a corporate risk (25 June 2019). The Committee are asked to endorse this decision.

Both CR16 Information Security and CR20 Road Safety risks are the subject to Deep Dive reports at the Audit and Risk Management Committee on 16 July 2019.

At the Committee's request, Chief Officers, who are corporate risk owners, were asked to review the corporate risk descriptions. As a result, the following corporate risks have had minor amendments to their descriptions – CR10 Adverse Political Developments, CR17 Safeguarding and CR 28 Action Fraud. CR20 Road Safety has been completely redrafted.

With the number of corporate risks now totalling 15 (11 in October 2018) there is a risk that there could be a loss of focus on the City Corporation's corporate risks particularly if more risks are added. (Note a new risk on financial sustainability is now being considered in relation to the effects of the major projects and other pressures the City Corporation is facing). CORMG are keeping the situation under review.

The total number of top red departmental risks is 13 (15 in April 2019). Six risks have been removed and four new risks added to this register.

On the CR26 Brexit risk (organisational impact), in April 2019, HM Government agreed an extension to Article 50 which now means that, unless there are other interventions, the UK will leave the EU on 31 October 2019. The corporate and departmental Brexit related risks continue to be reviewed by Chief Officers.

Recommendations

The Committee is asked to:

1. Note the risk report, including the discussion on the number of corporate risks.
2. Endorse the decision of Summit Group to reconfirm corporate status on the revised CR20 Road safety risk.








Background









- 1 The corporate risk and top red departmental risk registers have been reviewed by the Chief Officer Risk Management Group on 4 June 2019 and Summit Group on 25 June 2019.
- 2 A total of 334 (343 in April 2019) wide ranging risks have been identified by departments - 29 red, 211 amber and 94 green risks.
- 3 Of the 334 total risks, there are 15 corporate, and 13 top red departmental level risks. There are another 95 amber and 39 green risks recorded at departmental level. The remaining 172 are recorded as either service, team or project level risks.
- 4 Departments have used the City Corporation's Risk Management Strategy to ensure that there is a consistent approach to the way risks are described and scored. Attached as appendix 1 is the corporate risk matrix which illustrates the likelihood and impact ratings as well as the definitions for red, amber and green risks.

Corporate risk register

- 5 There are currently 15 corporate risks (four red and 11 amber). A copy of the corporate risk register is attached as appendix 2a together with the risk assessment history of the corporate risks (appendix 2b).

Table 1 below – List of current corporate risks as at 1 July 2019 (ordered by corporate - strategic and operational categories)

Risk ref	Risk title	Status	Risk Score	Trend Icon	Strategic/Operational
CR24	Operational Security	Red	24		S/O
CR28	Action Fraud	Red	24		S/O
CR27	Change Management	Amber	8		S
CR02	Loss of Business Support for the City	Amber	12		S
CR23	Police Funding	Red	16		S
CR10	Adverse Political Developments	Amber	8		S
CR26	Brexit risk	Amber	12		S

CR20	Road Safety (Revised risk description, actions and risk score)	Red	16		○
CR16	Information Security (re- escalated on to the corporate risk register – May 2019)	Amber	12		○
CR21	Air Quality	Amber	12		○
CR01	Resilience Risk	Amber	12		○
CR09	Health and Safety Risk (revised wording awaiting)	Amber	12		○
CR17	Safeguarding	Amber	8		○
CR25	GDPR Compliance (under review – pending internal audit report)	Amber	6		○
CR27	Change Management	Amber	6		○

Changes to the Corporate risk register

- 6 Two risks have increased in risk score – CR16 Information Security risk from an amber 8 to an amber 12 (see para 9) and CR20 Road Safety – from an amber 12 to a red 16 (see para10).
- 7 At the Committee's request, Chief Officers, who are corporate risk owners, were asked to review the corporate risk descriptions. The following corporate risks have had minor amendments – CR10 Adverse Political Developments, CR17 Safeguarding and CR 28 Action Fraud. CR20 Road Safety has been completely redrafted. CR09 Health and Safety risk has been redrafted and this is now awaiting Chief Office sign off. The revised version of CR09 risk will be included in the next risk update report.
- 8 CR25 GDPR Compliance risk is currently under review for de-escalation to departmental level pending the outcome of an internal audit review which is due to start shortly. The target date for this risk is now 30 September 2019.

CR 16 Information Security Risk

- 9 Summit Group were advised at their meeting on 24 April 2019 that the Audit and Risk Management Committee (12 February 2019) agreed to de-escalate the CR16 Information Security risk to departmental level (Chamberlain's). Subsequent to this decision the Digital Services Sub Committee, at their meeting on 5 April 2019, questioned whether the information security risk should be re-classified as a corporate level risk given the potential operational and reputational impacts to the City Corporation. This matter was raised at the Audit and Risk Management Committee (7 May 2019), where it was requested that the information security risk be returned to the corporate risk register, pending a review at their meeting on 16 July 2019. CR16 Information Security risk has been re-rated to an amber 12 from an amber 8. A deep dive report for CR16 Information Security risk is included with this agenda.

CR 20 Road Safety

10 The Director of Built Environment has revised the CR20 Road Safety risk description and current/target risk scores following representations by the Planning and Transportation Committee to the Audit and Risk Management Committee on 7 May 2019. Summit Group reconfirmed the redrafted CR20 Road Safety with a current risk score of 16 red (previous risk score amber 12). The Audit and Risk Management Committee is asked to endorse this decision. A deep dive report for CR20 Road Safety risk is included with this agenda.

Disposition of corporate risks on the risk matrix

11 Table 2 below shows the disposition of corporate risks on the risk matrix between 26 April and 1 July 2019).



Growth in the number of corporate risks

12 At CORMG on 4 June 2019, the Group discussed the recent growth in the number of corporate risks (from 11 in October 2018 to 15 as at 1 July 2019) as well as the potential for the number of risks, to be considered as corporate, to increase further. They noted that this was in part due to the greater awareness of the risk reporting framework across the City Corporation as well as the priority funding given to capital projects where a project was linked to a corporate risk. There was a risk that there could be a loss of focus on the most important risks, should the corporate register continue to grow. CORMG will keep this situation under review.

Corporate risk ratings and target dates

13 Out of the fifteen corporate risks, five risks have annual target dates and relate to longer term risks. These are:

- CR01 Resilience risk
- CR02 Loss of Business Support for the City

- CR09 Health and Safety (Revised risk description awaited)
- CR10 Adverse political developments
- CR17 Safeguarding

The ten risks relate to specific target dates where the risk scores should be achieved.

- 14 The corporate risk with the highest likelihood rating (Likely) is CR23 Police funding. The following corporate risks which have the highest impact rating (Extreme) are CR10 Adverse Political Developments, CR17 Safeguarding, CR20 Road Safety, CR24 Operational Security and CR28 Action Fraud.

Top departmental red risks

- 15 There are 13 top red departmental risks (15 in April 2019). There continues to be a fluid movement of top red departmental risk register with six risks being removed and four new risks being added to the register. One risk, CLF 012 School Estate Plan has been re-rated from a red 24 to a red 16 following approval of the financial arrangements for this project. (see appendices 3a – top red departmental detailed risk register and 3b – risk assessment history)
- 16 The new risks added to the register include BBC Ex Halls Compliance and condition risk, BBC 006 Buildings MAN/CCC 002 Working at Height, OSD 005 Pests and Diseases. The risks removed include three Chamberlain’s IT risks, a CLF risk concerning political changes affecting the school, the Town Clerk’s CRM system and the Markets and Consumer Protection’s Brexit risk (now rated as an amber risk).

Brexit

- 17 In April 2019, HM Government agreed an extension to Article 50 which now means that, unless there are other interventions, the UK will leave the EU on 31 October 2019. The corporate and departmental Brexit related risks continue to be reviewed by Chief Officers.

Conclusion

- 18 The corporate and departmental risk registers were reviewed by the Chief Officer Risk Management (CORMG) on the 4 June 2019 and Summit Group on 25 June 2019. The CORMG provides additional assurance to the Summit Group, Chief Officer Group and the Audit and Risk Management Committee that corporate and top red departmental risks are appropriate and being actively managed.

Appendices:

APPENDIX 1 – Corporate Risk Matrix

APPENDIX 2a – Corporate risk register – detailed version

APPENDIX 2b – Corporate risk register – risk assessment history

APPENDIX 3a – Top red departmental risk register - detailed version

APPENDIX 3b – Top red departmental risk history status

APPENDIX 4 – CR28 Action Fraud (Not for Publication)

Contact: *Paul.Dudley* | *Paul.Dudley@cityoflondon.gov.uk* | 02073321297

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City of London Corporation Risk Matrix (Black and white version)

Note: A risk score is calculated by assessing the risk in terms of likelihood and impact. By using the likelihood and impact criteria below (top left (A) and bottom right (B) respectively) it is possible to calculate a risk score. For example a risk assessed as Unlikely (2) and with an impact of Serious (2) can be plotted on the risk scoring grid, top right (C) to give an overall risk score of a green (4). Using the risk score definitions bottom right (D) below, a green risk is one that just requires actions to maintain that rating.

	Rare (1)	Unlikely (2)	Possible (3)	Likely (4)
Criteria	Less than 10%	10 – 40%	40 – 75%	More than 75%
Probability	Has happened rarely/never before	Unlikely to occur	Fairly likely to occur	More likely to occur than not
Time period	Unlikely to occur in a 10 year period	Likely to occur within a 10 year period	Likely to occur once within a one year period	Likely to occur once within three months
Numerical	Less than one chance in a hundred thousand (<10-5)	Less than one chance in ten thousand (<10-4)	Less than one chance in a thousand (<10-3)	More than one chance in a hundred (<10-2)

Appendix 1

	X	Impact			
		Minor (1)	Serious (2)	Major (4)	Extreme (8)
Likelihood	Likely (4)	4 Green	8 Amber	16 Red	32 Red
	Possible (3)	3 Green	6 Amber	12 Amber	24 Red
	Unlikely (2)	2 Green	4 Green	8 Amber	16 Red
	Rare (1)	1 Green	2 Green	4 Green	8 Amber

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(B) In (C) Risk scoring grid

(D) Risk score definitions

RED	Urgent action required to reduce rating
AMBER	Action required to maintain or reduce rating
GREEN	Action required to maintain rating

This is an extract from the City of London Corporate Risk Management Strategy, published in May 2014.

Contact the Corporate Risk Advisor for further information. Ext 1297

October 2015

City of London Corporation Risk Matrix (Black and white version)

Note: A risk score is calculated by assessing the risk in terms of likelihood and impact. By using the likelihood and impact criteria below (top left (A) and bottom right (B) respectively) it is possible to calculate a risk score. For example a risk assessed as Unlikely (2) and with an impact of Serious (2) can be plotted on the risk scoring grid, top right (C) to give an overall risk score of a green (4). Using the risk score definitions bottom right (D) below, a green risk is one that just requires actions to maintain that rating.



Impact title	Definitions
Minor (1)	Service delivery/performance: Minor impact on service, typically up to one day. Financial: financial loss up to 5% of budget. Reputation: Isolated service user/stakeholder complaints contained within business unit/division. Legal/statutory: Litigation claim or fine less than £5000. Safety/health: Minor incident including injury to one or more individuals. Objectives: Failure to achieve team plan objectives.
Serious (2)	Service delivery/performance: Service disruption 2 to 5 days. Financial: Financial loss up to 10% of budget. Reputation: Adverse local media coverage/multiple service user/stakeholder complaints. Legal/statutory: Litigation claimable fine between £5000 and £50,000. Safety/health: Significant injury or illness causing short-term disability to one or more persons. Objectives: Failure to achieve one or more service plan objectives.
Major (4)	Service delivery/performance: Service disruption > 1 - 4 weeks. Financial: Financial loss up to 20% of budget. Reputation: Adverse national media coverage 1 to 3 days. Legal/statutory: Litigation claimable fine between £50,000 and £500,000. Safety/health: Major injury or illness/disease causing long-term disability to one or more people objectives: Failure to achieve a strategic plan objective.
Extreme (8)	Service delivery/performance: Service disruption > 4 weeks. Financial: Financial loss up to 35% of budget. Reputation: National publicity more than three days. Possible resignation leading member or chief officer. Legal/statutory: Multiple civil or criminal suits. Litigation claim or fine in excess of £500,000. Safety/health: Fatality or life-threatening illness/disease (e.g. mesothelioma) to one or more persons. Objectives: Failure to achieve a major corporate objective.

Corporate risks - detailed report EXCLUDING COMPLETED ACTIONS

Report Author: Paul Dudley

Generated on: 01 July 2019



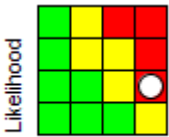


Rows are sorted by Risk Score

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR24 Operational Security 07-Jun-2017 John Barradell	<p>Cause: Inadequate, poorly maintained or time expired security infrastructure; lack of security culture within the organisation; poor training or organisation of staff; insufficient staff.</p> <p>Event: Security of an operational property is breached.</p> <p>Effect: Unauthorised access to building by criminals/protestors/terrorists; disruption of business/ high profile events; reputational damage; injury or potential loss of life amongst staff or members of the general public</p>	<p>Likelihood</p> <p>Impact</p>	24	<p>* Mitigation works for CR24 location B now due to start 22nd July 2019.</p> <p>• CR24 location A: 7 areas now complete and final design sign off for the last mitigation in hand, detailed design in process</p> <p>02 Jul 2019</p>	<p>Likelihood</p> <p>Impact</p>	16	31-Jan-2020	<p>Constant</p>

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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR24a	Deliver a programme of security infrastructure enhancements	<p>Out of the three key strands, one now fully complete.</p> <p>Second strand:</p> <p>CR24 location B now due to start 22nd July 2019.</p> <p>CR24 location A: 7 areas now complete and final design sign off for the last mitigation in hand, detailed design in process.</p> <p>Third strand, has now been tendered and the contractor is waiting start work. The works are programmed for completion at the end of the year.</p>	Paul Wilkinson	02-Jul-2019	31-Jan-2020
CR24b	Mitigating risk of vehicle borne attacks across Corporation estate.	Target hardening to six high risk sites is now complete since the last deep dive, three areas have temporary mitigation in place whilst permanent solutions are in design and construction. There are three in detailed design and three under construction.	Carolyn Dwyer; Paul Wilkinson	02-Jul-2019	31-Jan-2020
CR24e	Protecting CR24 location A for major events by installing HVM.	CR24 location A: 7 areas now complete and final design sign off for the last mitigation in hand, detailed design in process.	Carolyn Dwyer; Richard Woolford	02-Jul-2019	30-Sep-2019

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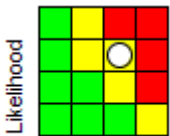

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR20 Road Safety	<p>Cause: Limited space on the City's medieval street network to cope with the increased use of the highway by vehicles, pedestrians and cyclists within the City of London. Interventions and legal processes take time to deliver SAFELY AND EFFECTIVELY</p> <p>Event: The City Corporation's statutory duties and the measures outlined in the Transport Strategy are not fully and effectively implemented.</p> <p>Effect:</p> <ul style="list-style-type: none"> The number of casualties occurring on the City's streets rises or remains unchanged instead of reducing 	 <p>Likelihood</p> <p>Impact</p>	16	<p>Following the revision of the risk description the risk rating has been updated. Impact has increased from 4 Major to 8 Extreme. This reflects the potential for death or serious injury from road traffic collisions and associated impacts. Likelihood has reduced from 3 Possible to 2 Unlikely. This reflects the Corporation's commitment to delivering Vision Zero as set out in the Transport Strategy, the current</p>	 <p>Likelihood</p> <p>Impact</p>	16	31-Mar-2022	

APPENDIX 2a

23-Oct-2015 Carolyn Dwyer	<ul style="list-style-type: none"> •The safety and feeling of safety of the City’s communities is adversely affected (Corporate Plan Outcome 1) •Physical or mental harm suffered by those involved in collisions and their associates •Economic costs of collisions impact on INDIVIDUALS, City businesses and wider society •The City Corporation’s ABILITY TO IMPROVE ROAD SAFETY is adversely impacted with businesses and/or the public BY VIRTUE OF A LOSS OF CREDIBILITY AND/OR AUTHORITY <p>(revised risk description 27/6/19)</p>			and planned programme of investment and activities, and TfL’s proposed changes to Ludgate Circus. 27 Jun 2019			Increasing
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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR20l Page 49	A programme of projects to reduce road danger on the City’s streets including: <ul style="list-style-type: none"> • Bank on Safety and All Change at Bank • RDR engineering programme • 15mph traffic limit • Ludgate Circus (lead by TfL) 	Interim improvements to Bank Junction are expected to be delivered immediately following the Lord Mayor’s Show. Funding has been identified to allow All Change at Bank to progress while the Fundamental Review is ongoing. A programme of minor schemes, such as raised tables, will be delivered throughout the year. Work is underway to prepare the submission to DfT requesting permission to implement the 15mph speed limit, including baseline speed monitoring in the autumn and establishing a CoL/CoL Police working group. TfL have confirmed that they aim to delivering changes to Ludgate Circus by the autumn.	Zahur Khan	27-Jun-2019	31-Mar-2022
CR20m	Campaigns and engagement activities to encourage safe behaviours and promote safe vehicles, including: <ul style="list-style-type: none"> • Active City Network • User and stakeholder liaison • Schools programme 	The Active City Network website has been updated. A joint campaign with the CoL Police will target powered two-wheeler riders will be delivered in late June. Continuing programme of roadshows in partnership with employers. Continuing to engage with insurance industry representatives to explore opportunities to collaborate on approaches to improving van driver behaviour .	Zahur Khan	27-Jun-2019	31-Mar-2022

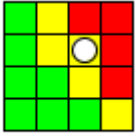
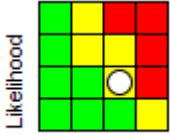

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Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR23 Police Funding 21-Nov-2016 Ian Dyson; Peter Kane	Cause: Reduction in government funding, workforce costs and growing demand in Policing services leading to pressures for the City Fund -Police. Event: Reduction in government funding. Failure to deliver VfM savings. Budget deficit forecast for next 5 years requiring action to balance the budget Effect: Potential impact on security and safety in the City as need to make savings, prioritise activity, review funding City of London Police will be unable to maintain a balanced budget and current service levels as reflected in their Medium Term Financial Plan.	 Likelihood Impact	16	While a balanced budget has been achieved for 2019/20, there remains considerable uncertainty over the medium term. 23 May 2019	 Likelihood Impact	12	31-Mar-2020	 Constant

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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR23g	Implement plan for sustainable settlement	An implementation plan has been developed, further actions to mitigate this risk will be identified and added as implementation progresses.	Alistair Cook	28-May-2019	31-Mar-2020

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Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR16 Information Security (formerly CHB IT 030) 10-May-2019 Peter Kane	Cause: Breach of IT Systems resulting in unauthorised access to data by internal or external sources. Officer/ Member mishandling of information. Event: Cybersecurity attack - unauthorised access to COL IT systems. Loss or mishandling of personal or commercial information. Effect: Failure of all or part of the IT Infrastructure, with associated business systems failures. Harm to individuals, a breach of legislation such as the Data Protection Act 2018. Incur a monetary penalty of up to €20M. Compliance enforcement action. Corruption of data. Reputational damage to Corporation as effective body.	 Likelihood	12 Impact	Following review with A&R committee and DSSC it was agreed that further steps were required to achieve maturity level that could bring the score to its target 01 Jul 2019	 Likelihood	8 Impact	31-Oct-2019	 Increasing

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR16k	Final stages of completing information security projects which will mean that we can assure Members that the City of London Corporation has implemented all the national government recommended security practices and technology achieving a maturity level of 4.	Information Security projects are being delivered as planned. The Information Security team recommended to the Audit and Risk Committee that this risk is reduced to Amber. Move towards a continuous improvement model is being adopted to ensure the controls in place are embedded, mature and reflective of emergent threats and risks.	Gary Brailsford-Hart	23-May-2019	30-Sep-2019
CR16l	New toolkit for monitoring and managing the security risk being discussed with the Digital Services Sub-Committee at their meeting on the 30th May 2019.	Risk is now Amber Recommending that the Digital Services Sub Committee adopts an additional tracking tool called the Cyber Security Board Toolkit This was agreed at last DSSC and a member's workshop is being arranged.	Gary Brailsford-Hart	01-Jul-2019	30-Aug-2019

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CR16m	Review of how Cyber risk is identified, analysed and monitored – the expectation is we should be moving beyond compliance measuring (Ten Steps) and seeking to integrate cyber security into organisational risk management processes.	<p>Compliance and security are not the same thing. They may overlap, but compliance with common security standards can coexist with, and mask, very weak security practices. Good risk management should go beyond just compliance. Good risk management should give insight into the health of the City of London and identify opportunities and potential issues.</p> <p>Many of our organisational risks will have a cyber component to them. Cyber security risk should therefore be integrated with our organisational approach to risk management. Dealing with cyber security risk as a standalone topic (or considering it simply in terms of 'IT risk') will make it hard for us to recognise the wider implications of those cyber security risks, or to consider all the other organisational risks that will have an impact on cyber security</p>	Gary Brailsford-Hart	01-Jul-2019	31-Jul-2019
CR16n	Now in continuous improvement with monitoring and review at the DSSC	<p>Updates to be provided to DSSC committee every two months with a deep dive at the next A&R Committee.</p> <p>Report provided to A&R, monitoring agreed to continue at DSSC.</p>	Gary Brailsford-Hart	01-Jul-2019	31-Jul-2019

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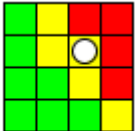
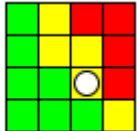
Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR01 Resilience Risk 20-Mar-2015 John Barradell	<p>Cause - Lack of appropriate planning, leadership and coordination</p> <p>Event - Emergency situation related to terrorism or other serious event/major incident is not managed effectively</p> <p>Effect - Major disruption to City business, failure to support the community, assist in business recovery. Reputational damage to the City as a place to do business.</p>	<p>Likelihood</p> <p>Impact</p>	12	<ul style="list-style-type: none"> Business Continuity training complete.action place now in place to implement key recommendations from the training and BIA process BECC Training session complete, process and call out still to be finalised . Cycle of training to continue Further staff awareness date planned 25/6/19 as part of cycle of training/awareness <p>07 Jun 2019</p>	<p>Likelihood</p> <p>Impact</p>	12	30-Apr-2020	<p>Constant</p>

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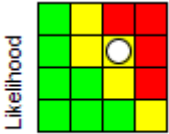
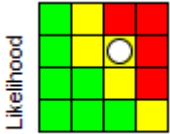
Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR01D	Working with the IS division, remove potential single points of failure from business continuity processes.	Following the LAN and WiFi upgrade work across the City Corporation's sites, network resilience for the organisation has greatly improved. The annual IT DR Test has been delayed due to issues with BT to the COL datacentre and other technology incidents taking priority (including the website malware incident.) The IT DR test is now scheduled for completion by the end of June 2019 and a report on outcomes and Lessons Learned will be provided following the test.	Gary Locker	07-Jun-2019	30-Jun-2019
CR01L	Assurance process with Cabinet Office College Provide refresher and initial training for Col staff, this training intended to increase knowledge to ensure BC plans are able to support the Col maintain its business during a major incident, provide an in depth independent oversight of the Col business impact analysis, identifying its most critical business areas	Action place now in place to implement key recommendations from the training and BIA process	Gary Locker	01-May-2019	30-Apr-2020
CR01M	process, training, call out process to strengthen the City capability and resilience in responding to major incident and complying with the wider London boroughs standardisation programme	Training for this session complete , process and call out still to be finalised	Gary Locker	01-May-2019	31-Dec-2019
CR01N	to increase City capability and resilience in also supporting wider London boroughs during major incident response, Local Emergency Control Centres, Emergency centres as part of a wider humanitarian	BECC training as part of this process completed March 2019 , cycle of training to continue Further staff awareness date planned 25/6/19 as part of cycle of training/awareness	Gary Locker	01-May-2019	31-Dec-2019

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date	Current Risk score change indicator
CR02 Loss of Business Support for the City	Cause - The City Corporation's actions to promote and support the competitiveness of the business City do not succeed. Event - The City's position as the world leader in international financial services is adversely affected	12	A draft deal has been agreed between the UK and EU, which will now be voted on in Parliament. Whilst it isn't certain the Withdrawal Agreement will be approved, it is notable	8	30-Apr-2020	■

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 54</p> <p>22-Sep-2014 Damian Nussbaum</p>	<p>Effect - The City loses its ability to attract and retain high value global business activity, both as a physical location and in mediating financial and trade flows; the City Corporation’s business remit is damaged and its perceived relevance is diminished. Reputational damage to the City as a place to do business and to Corporation ability to govern effectively</p>	<p>Likelihood</p>  <p>Impact</p>	<p>progress a draft text has been produced. The deal was heavily defeated in Parliament, and following subsequent Parliamentary votes, the Prime Minister will be engaging with the EU27 to seek changes to the Backstop provisions of the Withdrawal Agreement. The second vote and third votes on the Prime Minister’s deal was also heavily defeated.</p> <p>UK regulatory authorities have announced unilateral action to mitigate the disruption to financial services in the event of “No Deal”. Whilst political statements for EU 27 are encouraging, reciprocal action needs to be taken by EU27 regulators. Progress has been made on this issue with ESMA and other Member State regulators taking appropriate action.</p> <p>Firms are making preparations to mitigate the impact of No deal.</p> <p>The UK Government has had a request to extend the Brexit deadline to 31 October 2019, approved by the EU27.</p> <p>07 Jun 2019</p>	<p>Likelihood</p>  <p>Impact</p>			<p>Constant</p>
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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR02H	Work on initiatives which ensure London is at the forefront of innovation in financial and professional services	<p>We have actively contributed to UK Government led initiatives with other markets on FinTech. A new Green Finance Institute will be established by the City Corporation in partnership with UK Government. A new Cyber strategy has been agreed with the City Police, and new work programmes on infrastructure and development finance are underway. Supporting the developing programme of work on digital skills through the Coalition for Digital Intelligence and the Financial Services Skills Taskforce. Have recently hosted the Innovate Finance Global Summit for FinTech.</p> <p>Engagement with policymakers and businesses at the recent World Economic Forum, has informed our ongoing work programme to increase bilateral trade and investment, as well as ensuring the UK economy is prepared for technological changes.</p> <p>Increased engagement with priority markets including Japan, US, Switzerland and China</p>	Damian Nussbaum	07-Jun-2019	30-Jun-2019

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR09 Health and Safety Risk	<p>Cause - Safety is treated as a low priority by the organisation, lack of training of staff and managers, management complacency, poor supervision and management</p> <p>Event - Statutory regulations and internal procedures relating to Health and Safety breached and/or not complied with.</p> <p>Effect - Possible enforcement action/ fine/prosecution by HSE, Employees/visitors/contractors may be harmed/injured, Possible civil insurance claim, Costs to the Corporation, Adverse publicity /damage to reputation, Rectification costs</p>	 <p>Likelihood</p> <p>Impact</p>	12	<ul style="list-style-type: none"> The new inspection programme initiated and now 45% progressed. H&S leadership workshop for Town Clerk's has been rearranged to 21/3/2019 COMPLETED A paper is being taken to the HS & Wellbeing committee as a proposal to refresh the H&S monitoring / KPIs. Agreed and being taken forward. Workshop arranged for mid-May with stakeholders Time to Talk MH campaign will start soon running 4 -15 Feb.COMPLETED Paper to HS&W committee on review of this CR09 (H&S) Risk Completed and also discussed at 	 <p>Likelihood</p> <p>Impact</p>	12	31-Dec-2019	■

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Page 56 -Sep-2014 Chrissie Morgan				CORMG where agreed to revise wording <ul style="list-style-type: none"> • Safer Services collaborative seminar with conflict management partners on 15/4 Livery Hall (140 delegates expected) COMPLETED • Make Time for Mental Health event at Mansion House 14/5. • New Guidance on H&S responsibilities issued with supporting campaign. • New Guidance on H&S for Homeworking issued along with Event Safety Management Plan Template • London Work at Height Seminar 12 July Guildhall <p>12 Jun 2019</p>			Constant
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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR09J	Deliver a series of health and safety audits and compliance checks to provide corporate assurance that the organisation is being managed safely	The new inspection programme initiated and now 45% progressed.	Sarah Blogg; Nikki Jago; Justin Tyas	12-Jun-2019	31-Dec-2019

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Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR21 Air Quality 07-Oct-2015 Jon Averns	<p>Cause: Small particulate pollution has chronic health impacts from long term exposure at very low concentrations and is in evidence within the City and central London. There is also a health impact associated with long term and short term exposure to nitrogen dioxide.</p> <p>Event: Under certain atmospheric conditions there is a higher probability of poor air quality within the City and it is more likely that residents, workers and visitors would suffer the acute consequences.</p> <p>Effect: The consequences both acute and chronic may include: An increase in hospital referrals placed upon both emergency services and the NHS for those already suffering from respiratory or cardiovascular conditions (it may also place a strain on City social services). An increase in deaths, particularly of those already suffering from respiratory or cardiovascular conditions (both residents and workers). Economic costs such as acting as a deterrent of businesses coming to London or staying and financial penalties for non-compliance with air quality limits. Persistent poor air quality may affect the longer term health of the City population. Persistent poor air quality may attract adverse media coverage making the City seem a less attractive place to live and work.</p>	<p>Likelihood</p> <p>Impact</p>	12	No change from previous assessment 13 May 2019	<p>Likelihood</p> <p>Impact</p>	6	31-Dec-2020	 Constant

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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR21 001i	Pilot an ultra-low emission street in the City of London.	Feasibility study complete. Consultation complete.	Jon Averns	13-May-2019	31-Dec-2019


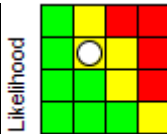

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Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR26 Brexit - Organisational Impact 11-Oct-2018 John Barradell	Cause – The outcome of Brexit negotiations does not secure continuity of contracts, access to talent, ongoing grant funding and/or security of supply chains Event – The City Corporation services fail to prepare appropriately for the UK departure from the EU in March 2019 Effect – There are a range of potential impacts. The City Corporation’s services are disrupted as supply chains and contracts are reassessed, potentially increasing cost and reprioritisation of resources. Uncertainty over multi-year grants may undermine the City Corporation’s ability to deliver or commit to services. The City Corporation may be unable to access the specialist talent and supply chains it needs to deliver some of its services.	Likelihood Impact	12	<ul style="list-style-type: none"> • Corporation officers attending City of London Police Brexit Planning and Gold Command meetings. • The weekly and monthly submissions to MHCLG are now by exception only. • Town Clerk attending regular meetings with the GLA, LLAG and London Councils on Brexit Preparedness. • Simon Latham & Emma Lloyd have been nominated as the Corporation's point of contact for London Councils briefings and work on this. • A review of the various Brexit risks was undertaken by Summit and a number of changes to scores agreed. • The next Brexit Planning Meeting is due to take place at the end of May. • The Town Clerk is chairing the London Strategic Coordination Group. 	Likelihood Impact	6	31-Oct-2019	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR26b	Progress on all departmental Brexit risks and their mitigations be reported monthly to Summit Group	• Corporation officers attending City of London Police Brexit Planning and Gold Command meetings.	Simon Latham	05-Jun-2019	31-Oct-2019

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		<ul style="list-style-type: none"> • The weekly and monthly submissions to MHCLG are now by exception only. • Town Clerk attending regular meetings with the GLA, LLAG and London Councils on Brexit Preparedness. • Simon Latham & Emma Lloyd have been nominated as the Corporation's point of contact for London Councils briefings and work on this. • A review of the various Brexit risks was undertaken by Summit and a number of changes to scores agreed. • The next Brexit Planning Meeting is due to take place at the end of May. • The Town Clerk is chairing the London Strategic Coordination Group. 			
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Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date	Current Risk score change indicator
R29 Information management Page 59 08-Apr-2019	<p>Cause: Lack of officer commitment and investment of the right resources into organisational information management systems and culture.</p> <p>Event: The City Corporation's IM Strategy (2018-2023) is not fully and effectively implemented</p> <p>Effect:</p> <ul style="list-style-type: none"> • Not being able to use relevant information to draw insights and intelligence and support good decision-making • Vulnerability to personal data and other information rights breaches and non-compliance with possible ICO fines or other legal action • Waste of resources storing information beyond usefulness 	 <p style="text-align: center;">Likelihood</p> <p style="text-align: center;">Impact</p>	<p>12</p> <p>The Information Management strategy has been agreed subject to a more detailed action plan and metrics to track performance.</p> <p>Progress is being made in developing a draft retention and disposal policy alongside reviewing roles to support good information management in the organisation and the business case for investment in tools required to help us manage and use our information more effectively.</p> <p>A draft Information Metrics model has been developed and discussed with the Information Management Board this now needs a final review with the Corporate Strategy and Performance team before being shared with SRG and Summit</p> <p>19 Jun 2019</p>	 <p style="text-align: center;">Likelihood</p> <p style="text-align: center;">Impact</p>	<p>6</p> <p>30-Jun-2020</p>	

APPENDIX 2a

John Barradell							Constant
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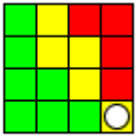
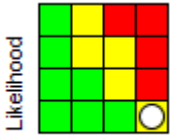

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR29a	Ensure that CoL has the necessary awareness, tools and skills to manage information effectively	<p>Work with the Head of Communications to communicate/raise awareness the IM Strategy and Policies. Provide training in SharePoint in preparation for migrating the Shared drives. Implement protective marking and information classification in CoL. Sharepoint to become the Corporate document management solution.</p> <p>Meeting being arranged with Communications to run campaign of awareness in October</p> <p>Training and communications on protective marking being developed</p>	Sean Green	14-Jun-2019	30-Sep-2019
CR29b	Start the culture change by Integrating good information management practice into the Leadership and Management stand of the City of London Learning Academy	<p>HR to work with the IT and the Corporate Strategy and Performance teams to identify the key skills required for good information management. HR to then develop the training to support this.</p> <p>HR to review where in HR policies and procedures this can be integrated. HR to Work with the senior leadership team to develop a plan and then deliver key messages and communications on the importance, relevance and benefits of good information management.</p> <p>Meeting held with HR who have agreed to support the development of training for the October launch</p>	Chrissie Morgan	14-Jun-2019	31-Mar-2020
CR29c	Ensure that CoL's information estate is safe, relevant, accurate, reliable, used and trusted.	<p>Implement and communicate relevant IM policies and IM Security.</p> <p>Develop and agree a Data Retention policy that links in with departmental retention schedules taking advice from the LMA.</p>	Sean Green	14-Jun-2019	30-Jun-2019

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		Draft Policy being reviewed by LMA to take back to SRG and Summit			
		Draft records Mgt policy being presented to Info Gov Group at the end of June			
CR29d	Ensure that CoL's derives real value and benefits from the use of information, data, analysis and modelling	IT to deliver the Business Intelligence Infrastructure to ensure that the Corporate Strategy and Performance team have the tools to develop business intelligence reports and analytics to support better decision making across CoL. Scope has been developed and is out for approval.	Sean Green; Kate Smith	14-Jun-2019	30-Aug-2019
CR29e	Ensure that CoL has the necessary checks, balances and oversight to ensure successful implementation of the IM Strategy	The Digital Services Task and Finish group to be established to provide governance and assurance that the strategy is being delivered. New IM Policies and compliance are already governed via the IM Governance Board. Meeting of this group booked in early July 2019	Sean Green	22-May-2019	30-Jul-2019
CR29f	Ensure officers can implement the data retention policy and data discovery requirements from GDPR	Put in place a new Data retention and discovery toolset to ensure we only retain and archive information in line with the agreed policy and retention schedule. Plan to use readily available MS tools and pilot the move of shared drives to MS Teams	Sean Green	14-Jun-2019	30-Nov-2019

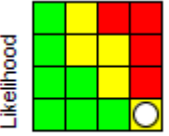
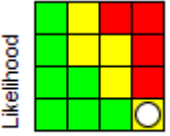
APPENDIX 2a

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR10 Adverse Political Developments 22-Sep-2014 Paul Double	<p>Cause: Policy issues that may compromise the City's operation as an international financial marketplace to which the City Corporation's functions are aligned; other financial services issues that make the City Corporation vulnerable to political criticism; local government proposals that call into question the justification for the separate administration of the Square Mile; overarching political hostility.</p> <p>Event: Changes in international relationships particularly those with the EU; reputational questions related to financial institutions; local government changes in London; increase in political hostility to the Corporation.</p> <p>Impact: Damage to the City's ability to put its case nationally and internationally and to the City's standing as a dedicated international financial marketplace. The City of London Corporation would be compromised if the City's position as a world-leading financial and professional services centre were undermined. Loss of City Corporation functions as a result of adverse attitudes towards the Corporation. The risk appetite is assessed on the basis of an assumption as to the Corporation's ultimate constitutional existence in its current form.</p>	Likelihood  Impact	8	Constant attention is given to the form of legislation affecting the City Corporation and the broader City, and any remedial action pursued. Making known the work of the City Corporation in the financial sphere among opinion formers, particularly in Parliament and central Government, is also part of the apparatus by which the City's voice is heard and by which the Corporation is seen to be "doing a good job" for London and the nation for a crucial sector of the economy; the foremost consideration at the present time is the continuing uncertainty in relation to Brexit. The same approach is replicated in respect of professional services; the digital economy; arts and culture; and other activities undertaken by the City Corporation. 28 Jun 2019	Likelihood  Impact	8	31-Mar-2020	 Constant

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR10a	Monitoring of Government legislation and proposed regulatory changes.	Relevant Bills in the Government's legislative programme will be identified and City Corporation departments alerted to issues of potential significance as the measures are introduced in the new Session. Action taken through negotiation with departmental officials or amendments tabled in Parliament as required. The legislative consequences of Britain leaving the EU as they may affect the Corporation and the City more generally as an international financial centre is a key priority.	Paul Double	01-Jul-2019	31-Mar-2020

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CR10b	Provision of information to Parliament and Government on issues of importance to the City.	Briefing has been provided for parliamentary debates including on Brexit, air quality, immigration, housing, planning, the creative industry, trade and investment, apprenticeships, economic crime, Fintech and broadband.	Paul Double	01-Jul-2019	31-Mar-2020
CR10c	Engagement with key opinion informers in Parliament and elsewhere. Programme of work to monitor and respond to issues affecting the reputation of the City Corporation.	Liaison with the City's MP and other MPs, Peers and Select Committee of both Houses on matters of importance to the City, including increased engagement on Brexit-related issues. Working with other organisations, including the Financial Markets Law Committee, to analyse the legal framework when an outcome on Brexit is agreed or if it is not. Continuing engagement on devolution in London and liaison with London Councils and Central London Forward on the application of devolution to the London boroughs and the City, either directly from Central Government or the Mayor.	Paul Double	01-Jul-2019	31-Mar-2020

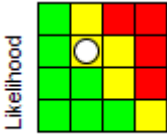
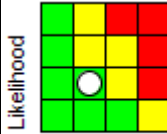

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
17 Safeguarding 22-Sep-2014 Andrew Carter	Cause: Not providing appropriate training to staff or members; not providing effective leadership, management or supervision; poor case management, information sharing or actions. Event: Failure to deliver actions under the City of London's Corporate Safeguarding Policy. All staff (and in particular social workers & teachers) not taking appropriate action in relation to safeguarding issues. Effect: Physical or mental harm suffered by a child or vulnerable adult, damage to the City of London's reputation, possible legal action, investigation by CQC and or Ofsted. (Risk description revised June 2019)	Likelihood 	8	A review of the Safeguarding arrangements in the City of London family of schools has been completed and a draft report is being prepared. The report will be presented to the Education Board in July 2019. The Children Act 2004 as amended by the Children and Social Care Act 2017 places new duties on key agencies in a local area. Local Safeguarding Children Boards will be replaced by new local safeguarding partnership arrangements from September 2019 23 May 2019	Likelihood 	8	31-Mar-2020	Constant

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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR17q	A review is being carried out into the business continuity arrangements for the staff providing the out of hours social care service. Following the review, a detailed and clear protocol for addressing issues regarding connectivity to the City of London Social Care system issues will be developed.	There have been some issues with the Out of Hours Social Care service being able to connect to the City of London Social Care System and work is being undertaken to address the issue. A full diagnosis of the issues has been completed and an action plan is being monitored by the Mosaic Advisory Board to ensure a permanent solution is in place. A preferred option to address the issues is under discussion with London Borough of Hackney and the software provider. Ongoing monitoring and maintenance of the arrangement with Hackney will be subject to review at the People Senior Management Team meetings.	Hasna Begum; Sharon McLaughlin	23-May-2019	30-Jun-2019
CR17r	A raising awareness campaign is being planned and will be launched shortly. This will cover education and early years settings and will include the role of the Local Authority Designated Officer and safeguarding enquiries.	A raising awareness campaign around Safeguarding and the role of the LADO within the Education Sector in the City of London will take place during the current academic year. A training gap analysis has been carried out and training to address this will be delivered during the summer term. A conference for staff from the sector is being planned for September 2019.	Theresa Shortland	23-May-2019	30-Sep-2019
CR17S	A review of safeguarding arrangements within the City of London family of schools, including the CoL academies has been commissioned by the Education Division. It is anticipated that the review will be completed by 31 March 2019	A review of the Safeguarding arrangements in the City of London family of schools has been completed and a draft report is being prepared. The report will be presented to the Education Board in July 2019.	Anne Bamford	23-May-2019	31-Jul-2019
CR17T	The Children Act 2004 as amended by the Children and Social Care Act 2017 places new duties on key agencies in a local area. Local Safeguarding Children Boards will be replaced by new local safeguarding partnership arrangements. These arrangements place statutory responsibilities upon 3 agencies to develop and implement a new partnership, these are Local Authorities, Health and Police.	The City and Hackney Safeguarding Children Board will be replaced by the City and Hackney Safeguarding Children Partnership (CHSCP). The new governance arrangements need to be approved by the Department for Education by end of June 2019 and in place and operational by September 2019. The final decision regarding the CHSCP governance arrangements will be made by the Chief Officers of the City of London Corporation Department of Community and Children Services, Hackney Children Services, the City and Hackney Clinical Commissioning Group, the City of London Police and the Metropolitan Police Service in Hackney. A report was presented to the Community and Children Services Committee in April 2019 setting out the details of the arrangements and the options currently being considered.	Sharon McLaughlin; Chris Pelham	23-May-2019	30-Sep-2019
CR17U	DCCS will be working with Town Clerks Department to deliver a Member briefing programme in 2019 that will enhance member knowledge and understanding of key safeguarding areas across children and adults.	The aim of the sessions is to raise awareness of Member responsibilities in respect of safeguarding. The briefings will include; <ul style="list-style-type: none"> • The Mental Capacity Act and Making Safeguarding Personal. • Adult Social Care • Rough Sleepers 	Chris Pelham	23-May-2019	31-Dec-2019

		<ul style="list-style-type: none"> • SEND/Safeguarding- Education and Safeguarding • The role of Corporate Parent- Children’s Social Care 			
CR17V	The City of London Safeguarding Policy was implemented in 2014. It is subject to review on an annual basis. A corporate safeguarding audit was undertaken in 2018/19.	<p>The Corporate safeguarding audit focused on:</p> <ul style="list-style-type: none"> • The safeguarding responsibilities of each of the City of London’s departments • Departmental heads’ understanding of these responsibilities • Governance structures for monitoring and reporting safeguarding issues • Responses to safeguarding incidents and how these were reported to the relevant committee(s) <p>The final audit report and recommendations will be presented to summit, Chief Officers Group and Audit and Risk Management Committee.</p>	Chris Pelham	23-May-2019	31-Oct-2019

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR25 General Data Protection Regulation Compliance 01-Dec-2017 Michael Cogher	<p>Cause: Inadequate departmental systems and procedures are in place which meet the additional requirements of GDPR legislation.</p> <p>Event: CoL is unable to comply with GDPR requirements - poor, non-secure and non-compliant processing of personal data.</p> <p>Effect: CoL exposed to adverse publicity, reputational damage, financial penalties imposed by the Information Commissioners Office. Increased volume of Subject Access Requests.</p>	 <p>Likelihood</p> <p>Impact</p>	6	<p>1. C&CS Information Compliance Team continues to advise departments on GDPR compliance issues and on embedding GDPR generally.</p> <p>2.The Mazars GDPR compliance audit is awaited which will provide an assessment of the level of compliance.</p> <p>27 Jun 2019</p>	 <p>Likelihood</p> <p>Impact</p>	4	30-Sep-2019	 Constant

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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR25h	<ul style="list-style-type: none"> Departments to supply existing records retention schedules to supplement the CoLC corporate retention schedule. GDPR compliance team to advise and review departmental retention schedules and liaise with departmental AIN representatives on required improvements. 	Retention schedules for 5 departments are nearing completion	Michael Cogher	26-Jun-2019	30-Jun-2019
CR25l	<ul style="list-style-type: none"> Paper to summit group on deletion of W drive data. Data discovery tool procurement 	<p>1. IS to deliver a business case to secure funding for a data discovery tool.</p> <p>2. Deputy IT Director & Head of Business Change and Engagement are developing a proposal for the management of the W:Drive.</p>	Matt Gosden; Sean Green	26-Jun-2019	30-Sep-2019

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Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR27 Change Management	<p>Cause: Failure to appreciate the scale, complexity and impact of change and take the necessary steps to ensure the organisation has the capability and capacity to change (to stay relevant)</p> <p>Event: poorly managed and ineffective change</p> <p>Effect:</p> <ul style="list-style-type: none"> Disruption to service, poor performance and damage to reputation Outcomes not achieved, reduction in benefits (financial and non-financial) Failure to change or keep up with change, organisational paralysis and reduction in ability to remain relevant 	<p>Likelihood</p> <p>Impact</p>	6	<ul style="list-style-type: none"> Corporate Strategy & Performance's Corporate Engagement Lead role 12m pilot in place Dec 2018. PMO's Programme Management Review running concurrently Plan is to bring these capabilities together as part of a single, streamlined officer governance system in 2020-21. Departmental workforce plans are being embedded in Business Plans with a forward look to show full upcoming requirements 	<p>Likelihood</p> <p>Impact</p>	4	31-Mar-2020	■

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 67</p>	<ul style="list-style-type: none"> • Adverse impacts on external stakeholders including businesses and residents. • Loss of valued staff and / or negative mental health impacts for staff. 		<ul style="list-style-type: none"> • Corporate Engagement Lead and Internal Communications delivering a corporate change campaign starting by feeding back and communicating actions in response to the Staff Survey results and cascading information about the fundamental review. 8 of 12 Fundamental Review / staff survey sessions now completed • A change team is being put together for specific support for the anticipated changes due to fundamental review, monitoring of redundancies for the notification to BEIS (Business, Energy and Industrial Strategy) is already established. Although the changes as a direct result of FR will be some way off, departments are obviously preparing for this and there are 5 restructures in JE at the moment. A Change Took Kit is also available. • The L&OD team are building support for Managers, Teams and Individuals to manage the review period and the subsequent changes in the most effective way possible. Team support will include interventions and individual support will include information advice and guidance. The L&OD team are also working with IT on training for staff to adopt and make best use of available technologies to both drive and support change. • The Policy Team are reviewing the policies and procedures around change and change management. 				
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APPENDIX 2a

John Barradell							Constant
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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR27a	To build the capability to look across existing and proposed programmes of work and assess their comparative benefits, risks and resource requirements and understand their interdependencies	<ul style="list-style-type: none"> • Corporate Strategy & Performance’s Corporate Engagement Lead role 12m pilot in place Dec 2018. PMO’s Programme Management Review running concurrently. Plan to bring these capabilities together as part of a single, streamlined officer governance system • Departmental workforce plans are being embedded in Business Plans with a forward look to show full upcoming requirements 	Kate Smith	01-Jul-2019	31-Mar-2020
CR27b	To help staff understand why, how and what we’re changing to increase engagement and take-up and deliver benefits	Corporate Engagement Lead and Internal Communications delivering a corporate change campaign starting by feeding back and communicating actions in response to the Staff Survey results and cascading information about the fundamental review. 8 of 12 Fundamental Review / staff survey sessions now completed	Kate Smith	01-Jul-2019	31-Jan-2020
CR27c	To build capacity and develop and grow our in-house capability and skills to manage change	<p>A change team is being put together for specific support for the anticipated changes due to fundamental review, monitoring of redundancies for the notification to BEIS (Business, Energy and Industrial Strategy) is already established. Although the changes as a direct result of FR will be some way off, departments are obviously preparing for this and there are 5 restructures in JE at the moment. A Change Took Kit is also available.</p> <p>The L&OD team are building support for Managers, Teams and Individuals to manage the review period and the subsequent changes in the most effective way possible. Team support will include interventions and individual support will include information advice and guidance. The L&OD team are also working with IT on training for staff to adopt and make best use of available technologies to both drive and support change.</p> <p>The Policy Team are reviewing the policies and procedures around change and change management.</p>	Chrissie Morgan	01-Jul-2019	31-Jul-2019

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Corporate Risk history

Generated on: 01 July 2019



Rows are sorted by Risk Score

Code & Title	Current Risk Score	Current risk Status	Target Risk Score	Target risk status	Last 5 Reviews	Last 5 Risk Scores	Likelihood	Impact	Trend Icon
CR24 Operational Security	24	RED	16	RED	07-Jun-19	24	Possible	Extreme	
					30-Apr-19	24	Possible	Extreme	
					09-Apr-19	24	Possible	Extreme	
					04-Mar-19	24	Possible	Extreme	
					12-Feb-19	24	Possible	Extreme	
CR28 Action Fraud	24	RED	12	AMBER	25-Jun-19	24	Possible	Extreme	
					07-Jun-19	24	Possible	Extreme	
					23-May-19	24	Possible	Extreme	
					05-Apr-19	24	Possible	Extreme	
					26-Mar-19	24	Possible	Extreme	
CR20 Road Safety	16	RED	16	RED	27-Jun-19	12	Possible	Major	
					27-Jun-19	16	Unlikely	Extreme	
					29-May-19	12	Possible	Major	
					18-Apr-19	12	Possible	Major	
					26-Feb-19	6	Possible	Serious	
CR23 Police Funding	16	RED	12	AMBER	23-May-19	16	Likely	Major	
					27-Mar-19	16	Likely	Major	
					13-Mar-19	16	Likely	Major	
					07-Jan-19	16	Likely	Major	
					19-Dec-18	16	Likely	Major	
CR01 Resilience Risk	12	AMBER	12	AMBER	07-Jun-19	12	Possible	Major	
					01-May-19	12	Possible	Major	
					09-Apr-19	12	Possible	Major	
					05-Mar-19	12	Possible	Major	
					01-Feb-19	12	Possible	Major	
CR02 Loss of Business Support for the City	12	AMBER	8	AMBER	07-Jun-19	12	Possible	Major	
					01-May-19	12	Possible	Major	
					28-Mar-19	12	Possible	Major	
					05-Mar-19	12	Possible	Major	
					01-Feb-19	12	Possible	Major	
CR09 Health and Safety Risk	12	AMBER	12	AMBER	07-Jun-19	12	Possible	Major	
					29-Apr-19	12	Possible	Major	
					29-Mar-19	12	Possible	Major	
					04-Mar-19	12	Possible	Major	
					01-Feb-19	12	Possible	Major	
CR16 Information Security (formerly CHB IT 030)	12	AMBER	8	AMBER	01-Jul-19	12	Possible	Major	
					01-Jul-19	12	Possible	Major	
					14-Jun-19	8	Unlikely	Major	
					14-Jun-19	6	Possible	Serious	
					23-May-19	8	Unlikely	Major	
CR21 Air Quality	12	AMBER	6	AMBER	13-May-19	12	Possible	Major	
					26-Apr-19	12	Possible	Major	
					03-Apr-19	12	Possible	Major	
					07-Mar-19	12	Possible	Major	
					05-Feb-19	12	Possible	Major	
CR26 Brexit - Organisational Impact	12	AMBER	6	AMBER	05-Jun-19	12	Possible	Major	
					20-Mar-19	12	Possible	Major	
					11-Mar-19	12	Possible	Major	
					07-Mar-19	12	Possible	Major	
					22-Feb-19	12	Possible	Major	
CR29 Information Management	12	AMBER	6	AMBER	22-May-19	12	Possible	Major	
					08-Apr-19	12	Possible	Major	
CR10 Adverse Political Developments	8	AMBER	8	AMBER	28-Jun-19	8	Rare	Extreme	
					01-Apr-19	8	Rare	Extreme	
					30-Jan-19	8	Rare	Extreme	
					03-Jan-19	8	Rare	Extreme	
					29-Oct-18	8	Rare	Extreme	
CR17 Safeguarding	8	AMBER	8	AMBER	20-Mar-19	8	Rare	Extreme	
					25-Jan-19	8	Rare	Extreme	
					13-Nov-18	8	Rare	Extreme	
					13-Nov-18	8	Rare	Extreme	
					03-Oct-18	8	Rare	Extreme	
CR25 General Data Protection Regulation Compliance	6	AMBER	4	GREEN	27-Jun-19	6	Possible	Serious	
					21-May-19	6	Possible	Serious	
					03-Apr-19	6	Possible	Serious	
					26-Mar-19	6	Possible	Serious	
					04-Feb-19	6	Possible	Serious	
CR27 Change Management	6	AMBER	4	GREEN	01-Jul-19	6	Possible	Serious	
					06-Jun-19	6	Possible	Serious	
					30-Apr-19	6	Possible	Serious	
					02-Apr-19	6	Possible	Serious	
					04-Mar-19	6	Possible	Serious	

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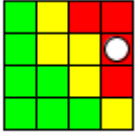
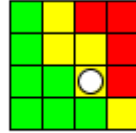

Top Red departmental risks - detailed report EXCLUDING COMPLETED ACTIONS

Report Author: Paul Dudley

Generated on: 01 July 2019



Rows are sorted by Risk Score

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date	Current Risk score change indicator
<p>Page 14</p> <p>243 Ex Halls Compliance and Condition Risk Resulting from Bow-Wave</p>	<p>Cause: Compliance and condition issues as indicated in various surveys including for LFS, insurance inspections, fire safety inspections and QS and condition survey inspections, which have identified a bow wave in the Exhibition Halls following around 15 years of reduced investment whilst the strategy for the property has been evolved.</p> <p>Event: Major incident including fire, loss of life, or loss of use of property resulting from the bow-wave and compliance issues.</p> <p>Impact: Loss of property, life and damage to brand. Financial and reputational damage.</p>	<p>Likelihood</p>  <p>Impact</p> <p>24</p>	<p>Exhibition Halls redevelopment forms a crucial part of the Beech Street redevelopment. The overhead waterproofing works plus the Culture Mile strategy offer a timely opportunity to address the bow wave issue in the Exhibition Halls 1 and 2.</p> <p>We have reports which indicate the condition of the property and what needs to be done to bring it back to a compliant state. The work needs to be done regardless of how and if the Exhibition Halls are redeveloped.</p> <p>The overhead waterproofing works are due to commence in the spring of 2020 and it is anticipated that the work above the Ex Halls will be</p>	<p>Likelihood</p>  <p>Impact</p> <p>8</p>	<p>31-Mar-2021</p>	

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11-Feb-2019 Jonathon Poyner				<p>completed by the spring of 2021. Therefore, the period spring 2020 to spring 2021 will provide the ideal opportunity to address the bow wave issues which are an estimated £5M to ensure compliance and bow wave points are addressed.</p> <p>12 Jun 2019</p>					Constant
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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
BBC Ex Halls 003a	Liaison with Beech Street Board and overhead works for suitable timeline.	Liaison with Beech Street Board and overhead works for suitable timeline.	Jonathon Poyner	12-Jun-2019	31-Aug-2019
BBC Ex Halls 003b	Gateway process to address the bow wave issues under the "do nothing" option for the Ex Halls, an estimated £5M.	Gateway process to address the bow-wave issues under the "do nothing" option for the Ex Halls, an estimated £5M.	Jonathon Poyner	12-Jun-2019	29-Feb-2020
BBC Ex Halls 003c	Carry out any local works to address high risk operational issues and ensure that local mitigations are in place pending the investment of ca £5M for the "do nothing" option as noted above.	Carry out any local works to address high risk operational issues and ensure that local mitigations are in place pending the investment of ca £5M for the "do nothing" option as noted above.	Jonathon Poyner	12-Jun-2019	29-Feb-2020
BBC Ex Halls 003d	Reduce the use of the Ex Halls in preparation of carrying out the works and so as to further reduce the likelihood and impact.	Reduce the use of the Ex Halls in preparation of carrying out the works and so as to further reduce the likelihood and impact.	Jonathon Poyner	12-Jun-2019	31-Aug-2019

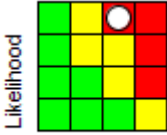
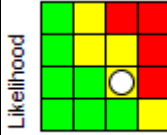

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Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
BBC Buildgs 006 Ex Halls Electrical Condition	<p>Cause: Poor condition of HV (High Voltage) and Low Voltage switchgear and associated equipment.</p> <p>Event:: Loss of electrical services. Failure of electrical safety equipment. Contaminated oil with banned substances.</p> <p>Impact: Closure of one or both Ex Halls and Cinemas 2 and 3, financial, operational and reputational impact. Fire risk. Risk to health.</p>	<p>Likelihood</p>	<p>16</p>	<p>A recent inspection highlighted several inadequacies in the electrical infrastructure. The oil in the HV transformers are contaminated with BCPs (Bi-chlorophenyls). These are banned substances that must be registered with the environmental agency and managed within set guidelines. The only way to remove them is by changing the oil, ca. £50k, or to replace the transformers, (ca. £70 - 80k each). The transformers are 40 years old (expected lifecycle 25 years).</p> <p>The battery units for the back up chargers have been replaced as an emergency due to the risk of fire The general condition of the HV switchgear, LV switchgear, buzz bars and electrical infrastructure is poor, partially due to the age of the equipment, and would not meet today's safety standards.</p> <p>Initial works took place in April 2019 and reduced the fire risk. The funding required to ensure reliability of electrical infrastructure is significant and will be part of the £4.8m Bow Wave funding that has been requested with the City Surveyor to be decided on by CASC.</p> <p>The environmental agency has increased the cost for registration of BCPs considerably to encourage early</p>	<p>Likelihood</p>	<p>12</p>	<p>01-Apr-2020</p>	<p>■</p>
		<p>Impact</p>			<p>Impact</p>			

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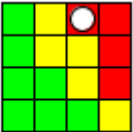

08-Feb-2019 Jonathon Poyner				rather than late replacement or removal. 25 Jun 2019				Constant
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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
BBC Builds 006a	Specified repairs to HV and LV systems and replacement of 2 no chargers.	Chargers have been replaced. In the long term, the likelihood of further reducing the risk will require major investment to replace or upgrade electrical plant as per Ex Halls bow wave.	Jonathon Poyner	12-Jun-2019	01-Apr-2020

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date	Current Risk score change indicator
Page 7 BBC Builds 007 High Risk Hazardous Work Areas 08-Feb-2019 Jonathon Poyner	Cause: Lack of suitable access equipment and rescue facilities. Event: Person entering dangerous or confined spaces with current infrastructure or not entering to avoid risk of injury/death. Impact: Injury or death. Inability to retrieve injured persons. Failure to carry our repairs to critical services. H & S, financial, reputational, operational risk.	 <p>Likelihood</p> <p>Impact</p>	<p>16</p> <p>All non-management staff have competed external training on working in confined spaces. training for management team is partially complete and las members due to attend in early August.</p> <p>Brief tour of issues given to CoL's Health and Safety Manager and Centre is currently working on a committee paper to seek approval to carry out building alteration adaption and to obtain appropriate funding.</p> <p>21 Jun 2019</p>	 <p>Likelihood</p> <p>Impact</p>	<p>8</p> <p>31-Dec-2021</p>	 <p>Constant</p>

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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
BBC Builds 007a	Specialist consultant required to review all qualified spaces to categorise risks, priorities (services contained), requirements and costs.	Gateway 1 to be presented to appropriate committees. Funding required to progress project.	Jonathon Poyner	12-Jun-2019	31-Oct-2019
BBC Builds 007b	This is for Members to decide how we progress the project (phasing and priorities).	This is for Members to decide how we progress the project (phasing and priorities).	Jonathon Poyner	12-Jun-2019	31-Jan-2020
BBC Builds 007c	Committee Chief Officer approval and contractor carries out construction work etc.	This is the actual work to make the areas accessible and safe to work in.	Jonathon Poyner	12-Jun-2019	31-Dec-2021

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
Page 75 BBC Commercial 003 Brexit Impact of Brexit on the Movement of Talent, Technical and Production Staff and Temporary Movement of Cultural Goods	<p>Cause: The outcome of Brexit negotiations impacts the ability of EU nationals to live/work in the UK and for cultural goods to move across borders.</p> <p>Event: The Barbican Centre is unprepared for the loss (or partial loss) of access to the best talent and specialist artists, performers, technical staff and cultural goods from the EU to produce a varied and attractive cultural programme.</p> <p>Effect:</p> <ol style="list-style-type: none"> 1.The cultural programme offered is not as varied and attractive as it would otherwise have been. 2.Customer expectations are not met with resultant reductions in revenues for both the Barbican Centre and catering contractors. 3.The reputation of the Barbican Centre (and the Culture Mile) as a premier cultural location is adversely affected. 4. Additional costs incurred to produce the Centre's cultural programme. 5.Less attractive for EU based artists. 6. Reduction in income streams. 7. Reduced footfall. 	Likelihood  Impact	16	As summarised in our report to the Brexit Committee chaired by the Town Clerk, we have continued to monitor and mitigate as appropriate. We continue to work with the City including the City Surveyor and Procurement on the operational risks and we have conducted our own internal BCP sessions as regards mitigating operational risks locally. Our move towards ever closer integration with the City over the past couple of years has meant that many of our important contracts are corporate contracts and the City Surveyor and City Procurement have been working with us over the years to ensure any new contracts have built in redundancy and mitigate risks including Brexit. The Arts Team continue to work with touring companies etc. and a separate	Likelihood  Impact	12	31-Oct-2019	■

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 76</p> <p>12-Dec-2018 Nicholas Kenyon</p>	<p>8. Procurement and contractor issues.</p>		<p>paper is provided to the City’s Brexit Risk Committee as this risk remains very live for the City and departments. Government are aware of potential issues, including for example people, and this has been fed in as required by the various bodies including sector and City. We continue to monitor closely and continue to work on mitigations.</p> <p>Event Cancellation Comms plan has been agreed with the City Communications team.</p> <p>We continue to liaise with the City Surveyor's team who have been looking at continuity planning and likely contracts of supply. We have been working with Procurement and the City Surveyor's team to ensure we minimise risk in existing or new contracts. We have conducted our own internal BCP sessions to look at operational issues and we continue to work on comms plans and contractual issues for the arts side.</p> <p>We will rerun risk assessment of events in our programme in the coming months to reflect new Brexit deadline.</p> <p>12 Jun 2019</p>				<p>Constant</p>
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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
BBC Commerc 003a	Ensure Brexit related press and Government actions are monitored.	Continued Monitoring.	Sandeep Dwesar	12-Jun-2019	31-Oct-2019
BBC Commerc 003b	Ensure potential risks and mitigations are identified and implemented	Teams are monitoring their own risk assessments and in particular the Arts and Commercial areas, which are then fed into Management for oversight. These are live documents and we are monitoring the evolving situation. The Brexit Risk Assessment document, (mentioned above), managed by Nick Adams, reporting to the Directorate, includes risks which the Directorate and teams deem necessary to record in support of the Pentana risk entry.	Sandeep Dwesar	12-Jun-2019	31-Oct-2019
BBC Commerc 003c	Ensure business plan includes flexibility and allows for Brexit modelling	We respond to enquiries from EU based partners on a case by case basis. Ongoing discussion with City Solicitors. Ongoing conversations with Chamberlain's with regards to the business model. Ongoing discussions with City Surveyor and Procurement as regards City centralised contracts and supply.	Sandeep Dwesar	12-Jun-2019	31-Oct-2019
BBC Commerc 003d	Ensure that suitable comms plans are in place.	Teams continue to work with Comms and City as appropriate to ensure a consistent message is put out as and when required. Management and teams working closely to ensure team risk assessments are live and the implications understood by management. Event Cancellation Comms plan has been agreed with the City Communications team.	Sandeep Dwesar	12-Jun-2019	31-Oct-2019

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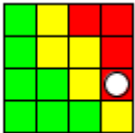
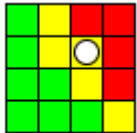
Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
BBC H&S 005 Failure to Deliver the Fire-Related Projects 06-Jul-2018	Cause: Inability to deliver the fire related projects in a timely and prioritised manner, resulting from insufficient resource, inability to get to access the areas or issues due to Listed Building Regulations, planning, etc. Event: Failure to deliver the fire related projects Impact: Delays to the projects would bring continued risk and need to maintain the current mitigations, incurring costs. Also increased risk of fire spreading more quickly or further	 Likelihood Impact	16	Works commence on site with appropriately qualified consultants within the next month. We continue to work with our colleagues at the City to find appropriately qualified consultants and workable solutions. The delivery of the works will be phased so that we can commence as soon as the consultants submit their report and recommendations for each zone of the building. 12 Jun 2019	 Likelihood Impact	2	01-Sep-2021	

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Jonathon Poyner							Constant
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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
BBC H&S 005a	Project planning and control during life of the projects to ensure fire safety while maintaining business continuity.	All projects updated at FSMG where discussion on maintaining fire safety throughout the projects are discussed. All projects will be appropriately resourced thus not pulling on the current resource at the Barbican.	Jonathon Poyner	12-Jun-2019	01-Sep-2021
BBC H&S 005b	The projects comply with current and respond to subsequent legislative changes during the lifetime of the projects; ensuring the contractors have engaged suitable consultants for the projects.	Procurement have assisted with contractor suitability supported by our CoL colleagues. The contracts are currently out to tender.	Jonathon Poyner	12-Jun-2019	01-Sep-2021
BBC H&S 005c	Projects being delivered within the agreed time frames and agreed budgets.	Current status is waiting for the return of submissions from contractors for the project work that is out to tender. The current funds have been secured following a peer review.	Jonathon Poyner	12-Jun-2019	01-Sep-2021
BBC H&S 005d	Select the appropriate contractors in line with CoL control of contractors' guidance who have developed robust business continuity plans following Brexit.	Correct level of qualified consultants are now approved. Risk of availability remains.	Jonathon Poyner	12-Jun-2019	01-Sep-2021
BBC H&S 005e	Delivering CIP following the outputs from FRAs and delivering the changes required to ensure PPMs.	Work continues in populating our PPMs. Currently sourcing a H&S software system to assist in our PPM programming. Currently discussing shared software with CoL colleagues.	Jonathon Poyner	12-Jun-2019	01-Sep-2021

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Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date	Current Risk score change indicator
CLF-012 Freemen's Estate Development Plan	<p>Cause(s): If the City committee programme reports are not supported by the appropriate committees.</p> <p>Event: the City Corporation approval for loan funding will not meet project timescales.</p> <p>Effect: resulting in key objectives / activities not being delivered on time and reputational damage to the School.</p>	<div style="display: flex; align-items: center;"> <div style="writing-mode: vertical-rl; transform: rotate(180deg); font-size: small; margin-right: 5px;">Likelihood</div>  <div style="margin-left: 10px;">16</div> </div> <p style="text-align: center; margin-top: 5px;">Impact</p>	After support was received for the School by members at the special meeting of the Resource Allocation Sub Committee and the Policy and Resources Committee in early April, the work on the Main House has been approved. Although their may still be challenges brought up as part of the Fundamental Review which could have an impact on the rest of the	<div style="display: flex; align-items: center;"> <div style="writing-mode: vertical-rl; transform: rotate(180deg); font-size: small; margin-right: 5px;">Likelihood</div>  <div style="margin-left: 10px;">12</div> </div> <p style="text-align: center; margin-top: 5px;">Impact</p>	31-Mar-2020	■

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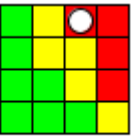
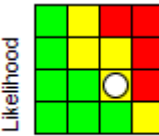
15-Nov-2016 Roland Martin				<p>FEDP and cause increase risk, at present, the School is not as open to as much risk as it has been in recent months.</p> <p>Staffing issues in Surveyors have had a negative impact on the proposed start of Main House works owing to late tender process. Impact yet to be reviewed but the current projection of three week delay could be manageable.</p> <p>27 Jun 2019</p>			Constant
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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
F-012A	Work with Chamberlain and Surveyor's Departments to develop and implement plan. Drive fundraising initiatives to ensure plan is achievable.	Action reviewed no change	Roland Martin	27-Jun-2019	31-Mar-2020

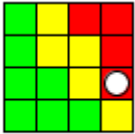
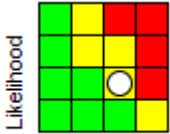

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
GSMD SUS 004 Failure to mitigate against a potential fall in EU student	The Vice Principal and Director of Music has prepared a Brexit mitigation strategy for the Music department, which is more exposed to a potential drop in recruitment from the EU than the Drama or Production Arts departments and accounts 75% of total student enrolment at the School. The plan includes: seeking to identify		16	Associated risks have been updated accordingly		8	31-Dec-2019	■

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<p>numbers as a result of Brexit</p> <p>03-Dec-2018</p> <p>Jo Hutchinson; Jeremy Newton</p>	<p>potential alternative loan providers should EU students lose access to the Student Loan Company; offering targeted fee waivers to EU students to counter the effect of higher fees; developing a new suite of short courses and foundation courses that would enable more Home students who were unsuccessful at their first audition to attend the School; reaching out to new markets beyond the EU from where the School has not historically recruited in significant numbers; and introducing remote teaching.</p>	 <p>Likelihood</p> <p>Impact</p>	<p>05 Jun 2019</p>	 <p>Likelihood</p> <p>Impact</p>	<p>Constant</p>
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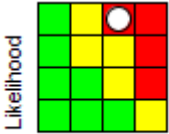
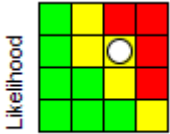

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
GSMD SUS 004a	Develop a marketing strategy to deliver a significant increase in quality applications by students from outside the EU	We have now recruited the Senior International Relations Manager who will start in August 2019, and will develop the international strategy. Applications open for entry 2020 in July, so work is now underway between Marketing and programme leaders to produce marketing plans aimed at both UK and international students.	Jo Hutchinson	05-Jun-2019	31-Dec-2019
GSMD SUS 004b	Carry out targeted fundraising to raise new scholarship funds dedicated to EU students, and review strategic use of existing scholarship funds	Funds raised for 2019/20 academic year are 20% up on 18/19, raising the progress measure to 75%	Jeremy Newton	05-Jun-2019	31-Dec-2019
GSMD SUS 004c	Develop and introduce a range of short course and foundation courses to 'skill up' additional Home students who would otherwise be unable to attend the School	No further updates to report at this stage.	Jonathan Vaughan	28-Mar-2019	31-Dec-2019
GSMD SUS 004d	Develop a framework for the delivery of remote learning	No further updates to report at this stage.	Jonathan Vaughan	28-Mar-2019	31-Dec-2019
GSMD SUS 004e	Develop a more extensive strategy for Guildhall Profs to engage in overseas workshops and masterclasses – specifically targeting North America and Commonwealth Countries - a process that has a historic proven track record in generating significant increases in OS applications and enrolments	Developing a plan for a summer recruitment drive in Australia, based around an invitation to the ANAM String Quartet Festival.	Jonathan Vaughan	28-Mar-2019	31-Dec-2019

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Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
MAN CCC 002 Working at Height 28-Sep-2018 Vic Annells	<p>Cause: Lack of effective management process and procedures for internal work at height including competency, supervision/management and protective systems</p> <p>Event: Fall of persons and/or objects from height</p> <p>Effect: Death or major life changing injuries, Enforcement action leading to prosecution and fines, financial losses, PI claim, Adverse effect on CoL/Court reputation / very negative publicity</p>	Likelihood  Impact	16	Progress has been delayed following the need to carry out an asbestos survey. 11 Jun 2019	Likelihood  Impact	8	31-Jul-2019	 Constant

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
Page 81	MAN CCC 002	This will flow from the Risk Assessment and Risk Register action Plan being developed.	Wayne Garrigan	30-Apr-2019	01-Sep-2019
	MAN CCC 002	CoL H&S Advisor and external Consultant will be providing training to the in-house maintenance team and managers.	Wayne Garrigan	30-Apr-2019	30-Jun-2019

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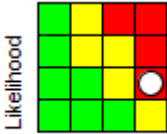
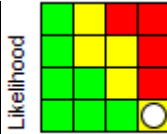
Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
OSD 005 Pests and Diseases summary risk 30-Aug-2017 Colin Buttery	<p>This risk summaries the pest and disease risks across the Open Spaces Department.</p> <p>Causes: Inadequate biosecurity; purchase or transfer of infected trees, plants, soil and/or animals; 'natural' spread of pests and diseases from neighbouring areas.</p> <p>Event: Sites become infected by animal, plant or tree diseases e.g. Oak Processionary Moth (OPM), foot and mouth, Mass aria, Ash Die Back, <i>Salmonella</i> (DT 191a), Bleeding Canker of Horse Chestnut</p> <p>Impact: Service capability disrupted, public access to sites restricted, animal culls, tree decline, reputational damage, increased cost of monitoring and control of invasive species, risk to human health from OPM or other invasives, loss of key native species, threat to existing conservation status of sites particularly those with woodland habitats.</p> <p>This risk is felt to be of departmental concern due to the potential biodiversity, financial and human health impacts associated with this risk.</p> <p>The actions for this risk are the open actions from each of the divisional risk registers.</p>	 <p>Likelihood</p> <p>Impact</p>	16	Risk upgrade to Red by committee on 8 April 2019 to reflect the increased impact of OPM on our sites. 24 May 2019	 <p>Likelihood</p> <p>Impact</p>	12	30-Apr-2020	 Constant

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
OSD EF 007 a	Implement actions arising from Massaria survey. Survey to be undertaken twice yearly	Ongoing action.	Geoff Sinclair	24-Jun-2019	08-Apr-2020
OSD EF 007 d	Sudden Oak Death - Yearly inspection of all Rhododendron and Larch. Tender of Larch removal (now completed). To be done yearly	The Larch were found to be clear of Ramorum disease and have been felled. Rhododendron regrowth at The Warren Plantation was sprayed off. Sweet Chestnut will still need monitoring in 2019. However, with the bulk of Rhododendron removed and all the Larch felled, the risk of spores spreading in quantity is assessed as low at the moment.	Jeremy Dagley	24-Jun-2019	31-Mar-2020
OSD EF 007 e	Need to develop a biosecurity policy and then implement.	The OPM outbreak is now dealt with under a separate risk action. The general Biosecurity Policy remains to be written for all the biosecurity risks. However, for Ramorum disease a protocol has been prepared and used by contractors during the Larch removal (see other risk actions). Once the OPM season is over, a Biosecurity Position Statement will be prepared	Jeremy Dagley	27-Jun-2019	30-Oct-2020

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		(~December 2019), and this is expected to feed into full biosecurity policy and INNS policy expected 2020.			
OSD EF 008 c	Develop an INNS policy - particular focus on OPM, although other pathogens and areas of concern to be tackled.	Progress made with Ramorum disease control and with INNS strategy for the 2019 season, with arborist officer appointed as lead on OPM matters. Other INNS need to be considered and no recent progress with Policy writing. An INNS position statement will be prepared at the end of the season (expected around December 2019) and this is expected to feed into the full policy (expected 2020). There will also be some horizon scanning carried out to consider likely new pest species.	Jeremy Dagley	27-Jun-2019	01-Jul-2020
OSD NLOS 004 a	Sourcing of plants / trees through approved suppliers. Review six monthly	Tree provenance is considered, the Division will source and use planting stock consistent with best practice guidance. Ongoing action.	Richard Gentry	24-May-2019	30-Apr-2020
OSD NLOS 004 b	Trained arboricultural contractors carrying out spraying of Oak in previously infected areas. Funding secured, although costs may escalate.	An update to the OPM situation was submitted to HHHWQP Committee in March 2019. This continues to be monitored locally and departmentally, with reports submitted as necessary. OPM and other pests have been escalated and are monitored as part of the departmental risk register.	Richard Gentry	24-May-2019	30-Apr-2020
OSD P&G 004 a	Ensure staff training is kept updated to enable timely identification of pest and knowledge of correct treatment/prevention.	Provision of staff training is ongoing. Info on training shared through HSiG, Equalities Board, SLT, and other avenues.	Lucy Murphy; Jake Tibbets	24-May-2019	30-Apr-2020
OSD P&G 004	Annual tree inspections undertaken through qualified personnel through framework contract	Last set of tree inspections completed October 2018.	Lucy Murphy; Jake Tibbets	24-May-2019	30-Apr-2020
OSD P&G 004 c	Alerts issued to staff enabling additional checks to be undertaken as part of everyday working practice	Ongoing risk management action.	Martin Rodman	24-May-2019	30-Apr-2020
OSD P&G 004 d	Maintain relationships with industry bodies and neighbouring local authorities to ensure free flow of information.	Ongoing action.	Lucy Murphy; Jake Tibbets	24-May-2019	30-Apr-2020
OSD TC 004 a	Ensure staff training is kept updated to enable timely identification of pest and knowledge of correct treatment/prevention.	Ongoing. Training needs reviewed at regular team meetings, and proactively promoted via HSiG and other corporate boards.	Hadyn Robson	24-Jun-2019	31-Mar-2022
OSD TC 004 b	Annual tree inspections undertaken through qualified personnel	Ongoing.	Hadyn Robson	24-Jun-2019	31-Mar-2022
OSD TC 004 c	Active involvement with leading partners such as Forestry Commission and Natural England	Ongoing.	Hadyn Robson	24-Jun-2019	31-Mar-2022
OSD TC 004 d	Measures in place for staff, volunteers and contractors including public messages	Ongoing.	Hadyn Robson	24-Jun-2019	31-Mar-2022

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Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
OSD 007 Maintaining the City's water bodies summary risk 30-Aug-2017 Colin Buttery	<p>This risk summaries the property maintenance risks across the Open Spaces Department.</p> <p>The City is responsible for a number of water bodies, some of which are classified as "Large Raised Reservoirs" under the provisions of the Reservoirs Act 1975 and the Flood & Water Management Act 2010.</p> <p>Failure to adequately manage and maintain the City's reservoirs and dams could result in leaks, dam collapse or breach.</p> <p>For some of the City's large raised reservoirs there is the potential for loss of life, damage to property and infrastructure in the event of dam collapse or breach, and the associated reputational damage.</p> <p>This risk is felt to be of departmental concern due to potential for serious consequences, the possibility of legislative change and the possibility that significant capital projects could be required.</p> <p>The actions for this risk are the open actions from each of the divisional risk registers.</p>	 <p>Likelihood</p> <p>Impact</p>	<p>16</p>	<p>Assessed by Senior Leadership Team. Risk remains at red. Details of work being undertaken is covered under the divisional risk registers.</p> <p>24 May 2019</p>	 <p>Likelihood</p> <p>Impact</p>	<p>8</p>	<p>31-Mar-2022</p>	<p>Constant</p>

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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
OSD EF 004 a	Statutory inspection visits by engineer - 6 monthly in May and October	Inspections completed in January. Several mitigation works have been completed. Discussion of Wanstead Park Lakes was undertaken. Large scale works still need to be undertaken to reduce this risk.	Martin Newnham; Geoff Sinclair	24-Jun-2019	30-Apr-2020
OSD EF 004 b	Complete works on the Eagle ponds and obtain approval for distribution of responsibilities. Survey the outward toe of the dam pending decision on shared responsibility with London Borough of Redbridge	Ongoing action - no significant developments since previous update.	Geoff Sinclair	24-Jun-2019	31-Dec-2022
OSD EF 004 c	Weekly inspection of reservoirs / dam. Review the use of penstock gates	Ongoing action.	Martin Newnham	24-Jun-2019	08-Apr-2020
OSD EF 004 e	Undertake scoping evaluations for Baldwins Pond and Birch Hall Park Pond	Ongoing action. Still awaiting further work by DBE.	Geoff Sinclair	24-Jun-2019	31-Dec-2022

APPENDIX 3a

OSD NLOS 007 a	Training for lifeguards Training is ongoing activity Review annually	Ongoing -Training needs and requirements are identified in staff performance reviews and 1:1 meetings throughout the year.	Richard Gentry	01-May-2019	31-Mar-2020
OSD TC 006 a	Condition assessments carried out and options provided for approval Options costed Gateway 4 report drafted - Sept 16	Project at The Commons remains a goal for the future. Ongoing action to mitigate risk, to be updated as project moves forward.	Hadyn Robson	24-Jun-2019	31-Dec-2022
OSD TC 006 b	Inspections / monitoring od outflow condition Ongoing	All water bodies are actively monitored by relevant authorities within the City to ensure they comply with legislation.	Hadyn Robson	24-Jun-2019	31-Mar-2020

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
SUR CB 003 City Bridges - Substantial Vessel strikes 01-Nov-2018 Paul Wilkinson	Cause: Substantial Vessel strike Event: Structural damage to bridge Impact: Instability in bridge structure leading to possible collapse. Death / injury, disruption of traffic, reputational damage, additional costs to repair / replace	 Likelihood	16	City Bridge Trust and Bridge House Estates are undertaking a governance review through an officer Task and Finish Group. The aspect of where risk ownership sits will be considered by this group in 2019. In the interim further discussions have taken place to put in place a Service Agreement between DBE and CSD to better manage responsibilities and information flow. 14 May 2019	 Likelihood	16	31-Mar-2020	 Constant

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
SUR CB 003a	Navigation controls	Navigation is controlled by the Port of London Authority and navigation lights fixed to bridges. Paul Monaghan is an on-going member of the River Crossings Liaison Group and is currently pursuing them for further meeting dates following their change in Chair. Paul	Nicholas Gill; Peter Young	23-May-2019	31-Mar-2020

APPENDIX 3a

		Monaghan updates CSD at the quarterly meetings as to any actions, activities, or change in the risk status of this item.			
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Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
<p>SUR CB 006 City Bridges: - Wanton Damage / Terrorism</p> <p>01-Nov-2018 Paul Wilkinson</p>	<p>Cause: Wanton Damage / Terrorism</p> <p>Event: Structural damage to bridge/s</p> <p>Impact: Instability in bridge structure , reputational damage, disruption to traffic, additional costs to repair / replace</p>	<p>Likelihood</p> <p>Impact</p>	<p>16</p>	<p>The Comptroller and City Solicitor has registered the City of London as an interested party for the inquiry into the London Bridge incident. The organisation has been supporting this by providing correspondence as required.</p> <p>City Bridge Trust and Bridge House Estates are undertaking a governance review through an officer Task and Finish Group. The aspect of where risk ownership sits will be considered by this group in 2019.</p> <p>In the interim further discussions have taken place to put in place a Service Agreement between DBE and CSD to better manage responsibilities and information flow.</p> <p>14 May 2019</p>	<p>Likelihood</p> <p>Impact</p>	<p>6</p>	<p>31-Mar-2020</p>	<p>■</p> <p>Constant</p>

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
SUR CB 006a	Counter Terrorism	Sequence of joint workshops were hosted by TFL over July. This involved TFL, the City Police, the MET Police and DBE. This investigated the risks associated with key bridges, with a different assessment made depending on the bridge. MET Police have yet to provide	Nicholas Gill; Paul Monaghan;	23-May-2019	31-Mar-2020

APPENDIX 3a

		paperwork and are awaiting clearance to do so – will be assessed once received.. Temporary mitigation by the Metropolitan Police remains in place, but this is not full Hostile Vehicle Mitigation.	Peter Young		
SUR CB 006b	Policing	The Bridge House Estate pay additional precept to the City of London Police to provide policing to the bridges.	Nicholas Gill; Paul Monaghan; Peter Young	23-May-2019	31-Mar-2020

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
SUR CB 007 City Bridges: - Tunnelling for the Thames Tideway Tunnel Page 87	Cause: Tunnelling for the Thames Tideway Tunnel effects bridge structures Event: Bridge/s become inoperable or have reduced operability Impact: Closure, reputational damage, disruption to traffic, additional costs to repair / replace		16	The tunnelling is expected to conclude in 2019, although currently the tunnelling is slightly behind schedule. It is expected that this risk, should it not materialise, will diminish significantly from this time. Works are on-going presently (May 2019) near Blackfriars Bridge. City Bridge Trust and Bridge House Estates are undertaking a governance review through an officer Task and Finish Group. The aspect of where risk ownership sits will be considered by this group in 2019. In the interim further discussions have taken place to put in place a Service Agreement between DBE and CSD to better manage responsibilities and information flow 20 May 2019		16	31-Mar-2021	
					Constant			

APPENDIX 3a

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
SUR CB 007d	Tideway Tunnelling	The City's Engineer, Paul Monaghan is working with the Comptroller and City Solicitor through the Development Consent Order and negotiated protection for the river crossings and, in the case of Tower Bridge, reduced face loss. He and the engineering team are working with the planning lead, Ted Rayment, to ensure that these requirements are being met. Regular weekly, monthly and quarterly meetings take place with the respective parts of TTT. For support they have the existing commission with an external engineering consultant appointed for the inspection of river crossings.	Nicholas Gill; Peter Young	23-May-2019	31-Mar-2021
SUR CB 007e	Monitoring & Works	Monitoring is on-going on the bridge sites to ensure that risks are managed. Monitoring at Tower Bridge has been in place for circa three years. Millennium Bridge has had its tensioning adjusted to account for any movement.	Nicholas Gill; Paul Monaghan; Peter Young	23-May-2019	31-Mar-2021



Top Red Departmental Risk history

Generated on: 01 July 2019

Rows are sorted by Risk Score

Code & Title	Current Risk Score	Current risk Status	Target Risk Score	Target risk status	Last 5 Reviews	Last 5 Risk Scores	Likelihood	Impact	Trend Icon
BBC Ex Halls 003 Exhibition Halls Compliance and Condition Risk Resulting from Bow-Wave	24	RED	8	AMBER	12-Jun-19	24	Possible	Extreme	
					09-May-19	24	Possible	Extreme	
					25-Mar-19	24	Possible	Extreme	
					11-Feb-19	24	Possible	Extreme	
					11-Feb-19	24	Possible	Extreme	
BBC Builds 006 Ex Halls Electrical Condition	16	RED	12	AMBER	12-Jun-19	16	Likely	Major	
					09-May-19	16	Likely	Major	
					25-Mar-19	16	Likely	Major	
					11-Feb-19	16	Likely	Major	
					08-Feb-19	32	Likely	Extreme	
BBC Builds 007 High Risk Hazardous Work Areas	16	RED	8	AMBER	12-Jun-19	16	Likely	Major	
					07-May-19	16	Likely	Major	
					25-Mar-19	16	Likely	Major	
					08-Feb-19	16	Likely	Major	
					08-Feb-19	16	Likely	Major	
BBC Commerc 003 Brexit Impact of Brexit on the Movement of Talent, Technical and Production Staff and Temporary Movement of Cultural Goods	16	RED	12	AMBER	12-Jun-19	16	Likely	Major	
					03-May-19	16	Likely	Major	
					01-Apr-19	16	Likely	Major	
					20-Mar-19	16	Likely	Major	
					14-Mar-19	16	Likely	Major	
BBC H&S 005 Failure to Deliver the Fire-Related Projects	16	RED	2	OK	12-Jun-19	16	Unlikely	Extreme	
					02-May-19	16	Unlikely	Extreme	
					05-Mar-19	16	Unlikely	Extreme	
					05-Feb-19	16	Unlikely	Extreme	
					09-Oct-18	16	Unlikely	Extreme	
CLF-012 Freeman's Estate Development Plan	16	RED	12	AMBER	27-Jun-19	16	Unlikely	Extreme	
					17-May-19	16	Unlikely	Extreme	
					26-Mar-19	24	Possible	Extreme	
					12-Nov-18	24	Possible	Extreme	
					04-Oct-18	24	Possible	Extreme	
GSMD SUS 004 Failure to mitigate against a potential fall in EU student numbers as a result of Brexit	16	RED	8	AMBER	13-Mar-19	16	Likely	Major	
					26-Feb-19	16	Likely	Major	
					25-Feb-19	16	Likely	Major	
					31-Jan-19	16	Likely	Major	
					11-Dec-18	16	Likely	Major	
MAN CCC 002 Working at Height	16	RED	8	AMBER	11-Jun-19	16	Unlikely	Extreme	
					16-Apr-19	16	Unlikely	Extreme	
					28-Sep-18	24	Possible	Extreme	
					24-May-19	16	Likely	Major	
					15-Apr-19	16	Likely	Major	
OSD 005 Pests and Diseases summary risk	16	RED	12	AMBER	19-Mar-19	12	Possible	Major	
					29-Jan-19	12	Possible	Major	
					22-May-18	12	Possible	Major	
					24-May-19	16	Unlikely	Extreme	
					19-Mar-19	16	Unlikely	Extreme	
OSD 007 Maintaining the City's water bodies summary risk	16	RED	8	AMBER	29-Jan-19	16	Unlikely	Extreme	
					29-Jan-19	16	Unlikely	Extreme	
					05-Dec-18	16	Unlikely	Extreme	
					29-Aug-18	16	Unlikely	Extreme	
					30-Apr-19	16	Unlikely	Extreme	
SUR CB 003 City Bridges: - Substantial vessel strikes	16	RED	16	RED	04-Apr-19	16	Unlikely	Extreme	
					01-Mar-19	16	Unlikely	Extreme	
					14-Dec-18	16	Unlikely	Extreme	
					01-Nov-18	16	Unlikely	Extreme	
					20-May-19	16	Likely	Major	
SUR CB 006 City Bridges: - Wanton Damage / Terrorism	16	RED	6	AMBER	20-May-19	16	Likely	Major	
					30-Apr-19	16	Likely	Major	
					01-Mar-19	16	Likely	Major	
					14-Dec-18	16	Likely	Major	
					30-Apr-19	16	Likely	Major	
SUR CB 007 City Bridges: - Tunnelling for the Thames Tideway Tunnel	16	RED	16	RED	01-Mar-19	16	Likely	Major	
					14-Dec-18	16	Likely	Major	
					12-Oct-18	16	Likely	Major	
					17-Aug-18	16	Likely	Major	
					30-Apr-19	16	Likely	Major	

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Committee(s)	Dated:
Audit & Risk Management	16 July 2019
Subject: CR20: Road Safety Risk deep dive	Public
Report of: Director of the Built Environment	For Information
Report author: Bruce McVean, Department of the Built Environment	

Summary

At the request of the Planning & Transportation Committee, CR20: Road Safety Risk has been reviewed and revised (Appendix 1).

The City of London Transport Strategy (adopted May 2019) sets out proposals to apply the safe systems approach and the principles of road danger reduction to deliver Vision Zero. The City Corporation has committed to eliminate death and serious injuries on the City's streets by 2040.

Measures to deliver Vision Zero and reduce road danger are being delivered across four themes: Safer streets; Safer speeds; Safer vehicles; and Safer behaviours.

While the total number of casualties has reduced between 2017 and 2018, provisional 2018 casualty figures for the City of London show a significant increase (42%) in serious injuries. This is currently being investigated and may be linked to changes in the way the City of London Police classify injuries, which were introduced in November 2017.

Recommendation(s)

Members are asked to note the report.

Main Report

Background

1. At the request of the Planning & Transportation Committee, CR20 – Road Safety Risk has been reviewed and revised (Appendix 1). The revision has updated the Effect to ensure it describes the true impacts of collisions, including the potential for physical and mental harm by those involved in collisions and their associates. The Cause has been updated to reflect the adoption of the City of London Transport Strategy.
2. The City of London Transport Strategy (adopted May 2019) sets out proposals to apply the safe systems approach and the principles of road danger reduction to deliver Vision Zero.

3. The City Corporation has committed to eliminate death and serious injuries on the City's streets by 2040. Interim targets are that no more than 35 people a year are killed or seriously injured by 2022 and that there are fewer than 16 deaths or serious injuries a year by 2030. These targets are aligned with the Mayor of London and TfL's trajectory to achieve Vision Zero across London.
4. Measures to deliver Vision Zero and reduce road danger will be delivered across four themes:
 - Safer streets - redesigning streets to reduce the likelihood and severity of collisions
 - Safer speeds - reducing the speed of vehicles to decreases the likelihood of a collision and the severity of injury in the event of one
 - Safer vehicles – promoting and championing measures to encourage the use of safer motor vehicles
 - Safer behaviours – encouraging all users of the City's streets to travel safely
5. Applying the safe system approach and the principles of road danger reduction means:
 - Being proportional in our efforts to tackle the sources of road danger, focussing on those users of our streets who have the greatest potential to harm others due to the size and speed of their vehicle
 - Recognising that people will always make mistakes and that collisions can never be eliminated. Our streets must therefore be designed, managed and used to cater for an element of human error and unpredictability
 - Reducing vehicle speeds on our streets to minimise the energy involved in collisions and protect people from death or injury
 - Seeking to reduce slight injuries and fear of road danger alongside the principal focus on eliminating death and serious injuries

Casualty figures

6. Provisional 2018 casualty figures for the City of London are (2017 figures in brackets):
 - Fatalities: 1 (2) fatality
 - Serious injuries: 74 (52) serious injuries
 - Slight injuries: 211 (366) slight injuries
7. While the total number of casualties has reduced – from 420 in 2017 and 286 in 2018 – there has been a significant increase (42%) in serious injuries. The reasons for this increase are currently being investigated and may be linked to changes in the way the City of London Police classify injuries. These were introduced in November 2017 and remove subjectivity from the system by strictly classifying injuries to groups with a linked severity.
8. A similar increase in the number of serious injuries occurred when the Metropolitan Police changed their system for recording injuries in 2016. For example, Westminster experienced a 66% increase in serious injuries between 2016 and 2017.

9. We will work with Transport for London and the City of London Police to identify the significance of the change in reporting methodology on the rate of reported serious injuries as more data becomes available.

Mitigating actions

10. Current actions to deliver Vision Zero and mitigate the CR20 risk are summarised below.

Safer streets

11. Bank on Safety and All Change at Bank: The timed access restrictions at Bank junction were made permanent in September 2018. Interim measures to further improve safety by providing more space for people walking will be delivered by spring 2020. Options for permanent change at Bank are currently being developed with the aim of delivering a transformational project that closes 2-3 arms of the junction to motor vehicles by 2022 (subject to Fundamental Review).
12. Ludgate Circus: We have been working with TfL to deliver safety improvements at Ludgate Circus. TfL have proposed introducing a restriction on vehicles turning left from Ludgate Hill on to New Bridge Street. This will allow more green man time to be allocated to pedestrians. TfL expect to deliver these changes in the autumn.
13. Bishopsgate and Gracechurch Street: We are liaising with TfL on potential changes to the junction of Bishopsgate and Bevis Marks/Wormwood Street and Gracechurch Street and Fenchurch Street/Lombard Street. These changes will improve safety for people walking and cycling through these junctions.
14. City cycle network: The Transport Strategy includes a proposal to create a network of safe and attractive routes for cycling in and through the City. Feasibility work on the first phase of the network will begin this year. Improvements to Quietway 11, including changes at Queen Street, will also be delivered this year.
15. Moorgate: Improvements to Moorgate, including the junction with London Wall, in conjunction with Crossrail.
16. Puddle Dock: We are working with TfL to deliver a pedestrian crossing on Upper Thames Street at Puddle Dock, with associated pedestrian improvements to Puddle Dock, by 2021.
17. City Cluster: A Healthy Streets Plan for the City Cluster is currently being developed. This will identify opportunities to change traffic movement and deliver greater pedestrian priority in line with the City Cluster Vision.

Safer speeds

18. 15mph speed limit: Subject to Department for Transport (DfT) approval a City-wide 15mph speed limit will be introduced by 2022. Work this year is focused on developing the submission to the DfT.

19. TLRN 20mph speed limit: We are supporting TfL's proposal to introduce a 20mph speed limit on Upper Thames Street, Lower Thames Street, Minories, Goodman's Yard and Mansell Street by 2020.

Safer vehicles

20. We are continuing to promote the use of safer vehicles through fleet accreditation schemes, such as the Fleet Operator Recognition Scheme (FORS), and other industry standards, such as Construction Logistics and Community Safety (CLOCS).

Safer behaviours

21. Education and engagement activities, many delivered in partnership with the City of London Police, include:
- Be Brake Ready campaign, highlighting the crowded nature of the City's streets the need for people driving and riding in the Square Mile to be ready to stop.
 - Safer City Rider campaign, encouraging safe riding by motorcycle and moped riders
 - Developing the Active City Network to engage with City businesses and their employees

Current and target ratings

22. Following the revision of the risk description the risk rating has been updated. Impact has increased from 4 Major to 8 Extreme. This reflects the potential for death or serious injury from road traffic collisions and associated impacts.
23. Likelihood has reduced from 3 Possible to 2 Unlikely. This reflects the Corporation's commitment to delivering Vision Zero as set out in the Transport Strategy, the current and planned programme of investment and activities.
24. The Committee's view on the Likelihood rating would be welcome, particularly whether this should be increased to 3 (Possible), bringing the overall score to 24. While the City Corporation has adopted a bold approach to delivering Vision Zero it will be several years before the projects and initiatives outlined above are delivered. The pace of delivery of these and future actions may also be impacted by resource constraints.
25. The target risk rating is also currently 8 and 2. A lower rating is not considered achievable in the medium term. This reflects the very significant change required to completely avoid the risk of a fatality occurring on the City's streets and the length of time required to deliver that change.

Conclusion

26. The City Corporation is committed to delivering Vision Zero and eliminating death and serious injury on the City's streets by 2040, with ambitious interim targets outlined in the City of London's Transport Strategy. A comprehensive programme

of projects and activities to deliver Vision Zero is currently being implemented, this includes working with TfL to deliver improvements on the Transport for London Road Network.

Appendices

- Appendix 1: CR20: Road Safety Risk

Background Papers

- [City of London Transport Strategy](#)

Bruce McVean
Acting Assistant Director (City Transportation)

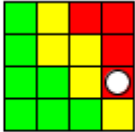
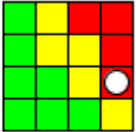
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CR20 Road Safety

Report Author: Paul Dudley
Generated on: 28 June 2019



Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date	Current Risk score change indicator
CR20 Road Safety 23-Oct-2015 Carolyn Dwyer	<p>Cause: Limited space on the City’s medieval street network to cope with the increased use of the highway by vehicles, pedestrians and cyclists within the City of London. Interventions and legal processes take time to deliver safely and effectively</p> <p>Event: The City Corporation’s statutory duties and the measures outlined in the Transport Strategy are not fully and effectively implemented.</p> <p>Effect:</p> <ul style="list-style-type: none"> •The number of casualties occurring on the City’s streets rises or remains unchanged instead of reducing •The safety and feeling of safety of the City’s communities is adversely affected (Corporate Plan Outcome 1) •Physical or mental harm suffered by those involved in collisions and their associates •Economic costs of collisions impact on individuals, City businesses and wider society •The City Corporation’s ability to improve road safety is adversely impacted with businesses and/or the public by virtue of a loss of credibility and/or authority. <p>(Revised risk description 27/6/19)</p>	<p>Likelihood</p>  <p>Impact</p>	<p>16</p>	<p>Following the revision of the risk description the risk rating has been updated. Impact has increased from 4 Major to 8 Extreme. This reflects the potential for death or serious injury from road traffic collisions and associated impacts. Likelihood has reduced from 3 Possible to 2 Unlikely. This reflects the Corporation’s commitment to delivering Vision Zero as set out in the Transport Strategy, the current and planned programme of investment and activities, and TfL’s proposed changes to Ludgate Circus.</p> <p>27 Jun 2019</p>	<p>Likelihood</p>  <p>Impact</p>	<p>16</p> <p>31-Mar-2022</p> <p>Increasing</p>

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Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR20l	A programme of projects to reduce road danger on the City's streets including: <ul style="list-style-type: none"> • Bank on Safety and All Change at Bank • RDR engineering programme • 15mph traffic limit • Ludgate Circus (lead by TfL) 	Interim improvements to Bank Junction are expected to be delivered immediately following the Lord Mayor's Show. Funding has been identified to allow All Change at Bank to progress while the Fundamental Review is ongoing. A programme of minor schemes, such as raised tables, will be delivered throughout the year. Work is underway to prepare the submission to DfT requesting permission to implement the 15mph speed limit, including baseline speed monitoring in the autumn and establishing a CoL/CoL Police working group. TfL have confirmed that they aim to delivering changes to Ludgate Circus by the autumn.	Zahur Khan	27-Jun-2019	31-Mar-2022
CR20m	Campaigns and engagement activities to encourage safe behaviours and promote safe vehicles, including: <ul style="list-style-type: none"> • Active City Network • User and stakeholder liaison • Schools programme 	The Active City Network website has been updated. A joint campaign with the CoL Police will target powered two-wheeler riders will be delivered in late June. Continuing programme of roadshows in partnership with employers. Continuing to engage with insurance industry representatives to explore opportunities to collaborate on approaches to improving van driver behaviour.	Zahur Khan	27-Jun-2019	31-Mar-2022

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Committee(s)	Dated:
Audit & Risk Committee	16 July 2019
Subject: CR 16 Information Security Risk Deep Dive	Public
Report of: The Chamberlain	For Information
Report author: Gary Brailsford-Hart ,Director of Information & Chief Information Security Officer	

Summary

The generally accepted definition of a data breach is a security incident in which sensitive, protected or confidential data is copied, transmitted, viewed, stolen or used by an individual not authorized to do so.

CR16 was developed as means to capture and mitigate the risks a ‘cyber breach’ would present to the City Corporation. It is evident that dependent on the nature of the breach the impact can vary from very low to critical. Cyber threat is often viewed as a complex, dynamic and highly technical risk area. However, what is often at the root of a breach is a failure to get the basics right, systems not being patched, personnel not maintaining physical security, suppliers given too much information.

The National Cyber Security Centre (NCSC) 10 Steps to Cyber Security framework has been adopted to strengthen the controls in this risk area; this framework is now used by the majority of the FTSE350. The control scores are developing well and are reflective of the ongoing adoption across the City Corporation, all risk areas continue to be actively monitored and risk managed. Scores will continue to increase as improvements to people, process and technology are delivered.

The overall objective is to bring our security controls to an appropriate level of maturity. Currently, the organisation has a target maturity score of Level 4 (Managed and Measureable) across all areas, three controls are currently at this level, and seven control areas are currently at Level 3 (Defined Process). The mitigation controls are currently Amber (action required to maintain or reduce rating), with the ongoing improvements the CR16 risk is currently Amber.

Recommendation(s)

Members are asked to:

- Note the report.

Main Report

Background

1. Cyberspace has revolutionised how many of us live and work. The internet, with its more than 3 billion users, is powering economic growth, increasing collaboration and innovation, and creating jobs.
2. Protecting key information assets is of critical importance to the sustainability and competitiveness of businesses today. The City Corporation needs to be on the front foot in terms of our cyber preparedness. Cyber security is all too often thought of as an IT issue, rather than the strategic risk management issue it actually is.
3. Corporate decision making is improved through the high visibility of risk exposure, both for individual activities and major projects, across the whole of the City Corporation.
4. Providing financial benefit to the organisation through the reduction of losses and improved “value for money” potential.
5. The City Corporation is prepared for most eventualities, being assured of adequate contingency plans. We have therefore adopted the NCSC Ten Steps to Cyber Security framework to assist and support our existing strategic-level risk discussions, specifically how to ensure we have the right safeguards and culture in place.
6. The creation of CR16 demonstrates the City Corporations commitment to the identification and management of this risk area.

Current Position

7. The development and implementation of an Information Security Management System (ISMS) was seen as an essential requirement to permit the measurement and assurance of the CR16 risk. A number of frameworks were considered, and the NCSC Ten Steps to Cyber Security framework, supported by the NCSC 20 Critical Security Controls, was chosen as the most appropriate for the City Corporation.
8. The first step of the ISMS is the “risk management regime“, as the NCSC describe it, this is the strategy that glues different controls and processes together. This ensures we do not fragment the approach to cyber security and identify hidden vulnerabilities and potential for compromise, ensuring the ability to measure the risk profile. The remaining nine steps are broken down into four clear delivery areas: Establish, Manage, Enhance, and Deliver.

Information Risk Management

	% Complete	Target Score	Actual Score	Trend
Information Risk Management	86%	4	4	-

Risk appetite statement is the next applicable piece of work in this area. Involves an overarching agreement with the SIRO and then a cascade framework for application in each of the business areas across the City. In addition, a code of connection has been developed to support institutional departments connecting to and consuming core IT services from City.



Establish

	% Complete	Target Score	Actual Score	Trend
Monitoring	72%	4	3	-
Incident Management	93%	4	4	↑
Secure Configuration	86%	4	3	-

The deployment, throughout October/November, of the Security Information and Event Management collector has taken place. However, connection work remains outstanding and once in place this will establish direct improvements to the monitoring and secure configuration across the City infrastructure.

Manage

	% Complete	Target Score	Actual Score	Trend
Network Security	69%	4	3	-
Managing User Privileges	75%	4	3	-

Network security will directly improve following the implementation of the Security Information and Event Management collector was deployed throughout October/November. The issues of managing user privileges is currently being managed manually and a technical solution has been purchased and is awaiting implementation across the infrastructure – this is a complex piece of software and whilst installation is simple, the application and management will take time to develop and tune.

Enhance

	% Complete	Target Score	Actual Score	Trend
Malware Prevention	68%	4	3	-
Removable Media Controls	89%	4	4	-

A project is underway to review the existing anti-malware solution and determine if enhancements are required, this has highlighted the need for anti-malware solutions for mobile devices. The removable media controls have recently been reviewed and the deployment of controls have been confirmed. To improve the removable media control score requires further work in respect of policies and user education, this is currently being included within the procedural refresh for removable media across IT, and this will include a sign-off process for receipt of device and responsibilities.

Deliver

	% Complete	Target Score	Actual Score	Trend
Home and Mobile Working	71%	4	3	↑
User Education and Awareness	75%	4	3	-

The next steps for the Home and Mobile Working control area are for a thorough review of user acceptance policies and guidance. In addition, the aging Citrix infrastructure is being replaced, once complete this will improve the scores in this area. A developed schedule of awareness and training is being rolled out across the organisation with a different theme each month.

9. To provide an overview of CR16 risk management the current compliance with the HMG Ten Steps assurance programme is detailed below (table 1) under each of the ten steps areas. The control scores continue to improve and are embedding across the City Corporation, the risk areas are actively monitored and risk managed. Scores continue to increase as improvements to people, process and technology are delivered as part of the continuous improvement process. We have delivered and assessed the mitigation controls and believe that we have achieved an acceptable level of assurance. Furthermore, the risk management framework will reflect the controls as they mature within the organisation.

Table 1 - HMG Ten Steps assurance for the City Corporation as at June 2019 compared to March 2018.

Ten Steps - Control Area	% 2018	% 2019	Target Score	Actual Score	Trend
1. Information Risk Management	61%	86%	4	4	↑
2. Network Security	55%	69%	4	3	↑
3. Malware Prevention	57%	68%	4	3	↑
4. Monitoring	25%	72%	4	3	↑
5. Incident Management	75%	93%	4	4	↑
6. Managing User Privileges	54%	75%	4	3	↑
7. Removable Media Controls	46%	89%	4	4	↑
8. Secure Configuration	68%	86%	4	3	↑
9. Home and Mobile Working	36%	71%	4	3	↑
10. User Education and Awareness	46%	75%	4	3	↑

Conclusion

10. There is an extensive programme of work underway to mitigate the risks identified within CR16. This report articulates the work in progress and clearly identifies where we will be directing continuing effort to manage this risk to an initial acceptable level and then monitoring as the controls mature across the organisation.
11. The breadth and scope of the necessary controls are cross-organisational and should not be entirely seen as a technical issue to be solved by the IT department. For example if users leave the door open and their computers logged on then technical controls cannot in themselves defend the organisation.
12. The realisation of this risk would certainly have a severe impact on technical systems and directly impact the operational effectiveness of potentially the entire City Corporation. It is therefore imperative that the underlying issue of developing a security culture is supported through the delivery of risk controls for CR16. There is positive support for this work across the organisation and senior management understand and are supportive of the necessary changes to ensure the City Corporation's security.
13. It is important to note that whilst we are improving the CR16 risk position, it will only remain so with the continued operation and maintenance of the controls being put in place to manage it and should not therefore be considered a one-off exercise.

Appendices

Detailed Appendices available on request:

- Appendix 1 – CR16 Information Security
- Appendix 2 – Deep Dive - Dashboard & Breakdown

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CR16 Information Security

Report Author: Paul Dudley

Generated on: 03 July 2019



Rows are sorted by Risk Score

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR16 Information Security Formerly CHB (030) 10-May-2019 Peter Kane	<p>Cause: Breach of IT Systems resulting in unauthorised access to data by internal or external sources. Officer/ Member mishandling of information.</p> <p>Event: Cybersecurity attack - unauthorised access to COL IT systems. Loss or mishandling of personal or commercial information.</p> <p>Effect: Failure of all or part of the IT Infrastructure, with associated business systems failures. Harm to individuals, a breach of legislation such as the Data Protection Act 2018. Incur a monetary penalty of up to €20M. Compliance enforcement action. Corruption of data. Reputational damage to Corporation as effective body.</p>	<p>Likelihood</p>	<p>12</p> <p>Impact</p>	Following review with A&R committee and DSSC it was agreed that further steps were required to achieve maturity level that could bring the score to its target 01 Jul 2019	<p>Likelihood</p>	<p>8</p> <p>Impact</p>	31-Oct-2019	<p>Constant</p>

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date

CR16k	Final stages of completing information security projects which will mean that we can assure Members that the City of London Corporation has implemented all the national government recommended security practices and technology achieving a maturity level of 4.	Information Security projects are being delivered as planned. The Information Security team recommended to the Audit and Risk Committee that this risk is reduced to Amber. Move towards a continuous improvement model is being adopted to ensure the controls in place are embedded, mature and reflective of emergent threats and risks.	Gary Brailsford-Hart	23-May-2019	30-Sep-2019
CR16l	New toolkit for monitoring and managing the security risk being discussed with the Digital Services Sub-Committee at their meeting on the 30th May 2019.	Risk is now Amber Recommending that the Digital Services Sub Committee adopts an additional tracking tool called the Cyber Security Board Toolkit This was agreed at last DSSC and a member's workshop is being arranged.	Gary Brailsford-Hart	01-Jul-2019	30-Aug-2019
CR16m Page 106	Review of how Cyber risk is identified, analysed and monitored – the expectation is we should be moving beyond compliance measuring (Ten Steps) and seeking to integrate cyber security into organisational risk management processes.	Compliance and security are not the same thing. They may overlap, but compliance with common security standards can coexist with, and mask, very weak security practices. Good risk management should go beyond just compliance. Good risk management should give insight into the health of the City of London and identify opportunities and potential issues. Many of our organisational risks will have a cyber component to them. Cyber security risk should therefore be integrated with our organisational approach to risk management. Dealing with cyber security risk as a standalone topic (or considering it simply in terms of 'IT risk') will make it hard for us to recognise the wider implications of those cyber security risks, or to consider all the other organisational risks that will have an impact on cyber security	Gary Brailsford-Hart	01-Jul-2019	31-Jul-2019
CR16n	Now in continuous improvement with monitoring and review at the DSSC	Updates to be provided to DSSC committee every two months with a deep dive at the next A&R Committee. Report provided to A&R, monitoring agreed to continue at DSSC.	Gary Brailsford-Hart	01-Jul-2019	31-Jul-2019

Appendix 2: 10 Steps to Cyber Security: Deep Dive - Dashboard & Breakdown

1. Information Risk Management



2. Network Security



3. Malware Prevention



4. Monitoring



5. Incident Management



6. Managing User Privileges



7. Removable Media Controls



8. Secure Configuration



9. Home and Mobile Working



10. User Education and Awareness



1 – Information Risk Management

Taking risk is a necessary part of doing business in order to create opportunities and help deliver business objectives. For the City Corporation to operate successfully it needs to address risk and respond proportionately and appropriately to a level which is consistent with what risks it is willing, or not, to tolerate. If we do not identify and manage risk it can lead to business failure.

The lack of an effective risk management and governance structure may lead to the following:

- **Exposure to risk:** Without effective governance processes the Board will be unlikely to understand and manage the overall risk exposure of the organisation.
- **Missed business opportunities:** Risk decisions taken within a dedicated security function, rather than organisationally, will be motivated by achieving high levels of security. This may promote an overly cautious approach to risk leading to missed business opportunities or additional cost.
- **Ineffective policy implementation:** The board has overall ownership of the corporate security policy. Without effective risk management and governance processes the Board won't have confidence that its stated policies are being consistently applied across the business as a whole.

Control Measures:

	% Complete	Target Score	Actual Score
Information Risk Management	86%	4	4
Establish a governance framework	100%	4	4
Determine the organisation's risk appetite	25%	4	2
Maintain the Board's engagement with information risk	100%	4	4
Produce supporting policies	100%	4	4
Adopt a lifecycle approach to information risk management	100%	4	4
Apply recognised standards	100%	4	4
Make use of endorsed assurance schemes	100%	4	4
Educate users and maintain their awareness	75%	4	3
Promote a risk management culture	75%	4	3

2 - Network Security

Networks need to be protected against both internal and external threats. If the City Corporation fails to protect the networks appropriately we could be subject to a number of risks, including:

- **Exploitation of systems:** Ineffective network design may allow an attacker to compromise systems that perform critical functions, affecting the City Corporation's ability to deliver essential services or resulting in severe loss of customer or user confidence.
- **Compromise of information:** A poor network architecture may allow an attacker to compromise sensitive information in a number of ways. They may be able to access systems hosting sensitive information directly or perhaps allow an attacker to intercept poorly protected information whilst in transit (such as between your end user devices and a cloud service).
- **Import and export of malware:** Failure to put in place appropriate security controls could lead to the import of malware and the potential to compromise business systems. Conversely users could deliberately or accidentally release malware or other malicious content externally with associated reputational damage.
- **Denial of service:** Internet-facing networks may be vulnerable to Denial Of Service (DOS) attacks, where access to services and resources are denied to legitimate users or customers.
- **Damage or defacement of corporate resources:** Attackers that have successfully compromised the network may be able to further damage internal and externally facing systems and information (such as defacing your organisation's websites, or posting onto your social media accounts), harming the organisation's reputation and customer confidence.

Control Measures:

	% Complete	Target Score	Actual Score
Network Security	69%	4	3
Police the network perimeter	75%	4	3
Install firewalls	100%	4	4
Prevent malicious content	75%	4	3
Protect the internal network	80%	4	3
Segregate network as sets	25%	4	1
Secure wireless devices	100%	4	4
Protect internal IP addresses	25%	4	1
Enable secure administration	25%	4	2
Configure the exception handling process	100%	4	4
Monitor the network	50%	4	2
Assurance process	100%	4	4

3 - Malware Prevention

Malware infections can cause material harm to our systems. This might include disruption of business services, unauthorised export of sensitive information or loss of access to critical data (eg caused by ransomware). The range, volume and source of information exchanged (as well as the technologies used) provide a range of opportunities for malware to be imported. Examples include:

- **Email:** Email still provides a primary path for internal and external information exchange. Malicious email attachments can cause their payload to be executed when the file is opened or otherwise processed. Email with malicious content may be specifically targeted at known individuals (known as spear phishing) with access to sensitive information, or at roles with elevated privileges. Alternatively malicious email may include embedded links that direct users to websites hosting malicious content.
- **Web browsing:** Users could browse (or be directed to) websites that may contain malicious content which seeks to compromise applications (such as the browser) that interact with that content
- **Web services:** User access to social media and other web based services could provide an ability for users to import a variety of data formats
- **Removable media and personally owned devices:** Malware can be transferred to a corporate system through the uncontrolled introduction of removable media or the direct connection of untrusted devices. This might include (for example) connecting a smartphone via a USB port, even if intended only to charge the device.

Control Measures:

	% Complete	Target Score	Actual Score
Malware Prevention	68%	4	3
Develop and implement anti-malware policies	75%	4	3
Manage all data import and export	75%	4	3
Blacklist malicious web sites	100%	4	4
Provide detailed media scanning machines	25%	4	1
Establish malware defences	75%	4	3
End user device protection	50%	4	2
User education and awareness	75%	4	3

4 - Monitoring

Monitoring provides the means to assess how systems are being used and whether they are being attacked. Without the ability to monitor your systems you may not be able to:

- **Detect attacks:** Either originating from outside the organisation or attacks as a result of deliberate or accidental user activity. Attacks may be directly targeted against technical infrastructure or against the services being run. Attacks can also seek to take advantage of legitimate business services, for example by using stolen credentials to defraud payment services.
- **React to attacks:** An effective response to an attack depends upon first being aware that an attack has happened or is taking place. A swift response is essential to stop the attack, and to respond and minimise the impact or damage caused.
- **Account for activity:** You should have a complete understanding of how systems, services and information are being used by users. Failure to monitor systems and their use could lead to attacks going unnoticed and/or non-compliance with legal or regulatory requirements.

Control Measures:

	% Complete	Target Score	Actual Score
Monitoring	72%	4	3
Establish a monitoring strategy and supporting policies	50%	4	2
Monitor all ICT systems	75%	4	3
Monitor network traffic	75%	4	3
Monitor all user activity	75%	4	3
Fine-tune monitoring systems	50%	4	2
Establish a centralised collection and analysis capability	75%	4	3
Provide resilient and synchronised timing	100%	4	4
Align the incident management policies	75%	4	3
Conduct a lessons learned review	75%	4	3

5 - Incident Management

Security incidents will inevitably happen and they will vary in their level of impact. All incidents need to be managed effectively, particularly those serious enough to warrant invoking the City Corporation's business continuity or disaster recovery plans. Some incidents can, on further analysis, be indicative of more severe underlying problems.

If the City Corporation fails to implement an incident management capability to detect, manage and analyse security incidents the following risks could be realised:

- **Managing business harm:** Failure to realise that an incident is happening or has occurred limits your ability to manage it effectively. This may lead to a much greater overall business impact, such as significant system outage, serious financial loss or erosion of public confidence.
- **Continual disruption:** An organisation that fails to address the root cause of incidents (such as poor technology or weaknesses in the corporate security approach) could be exposed to repeated or continual compromise or disruption.
- **Failure to comply with legal and regulatory reporting requirements:** An incident resulting in the compromise of sensitive information covered by mandatory reporting requirements could lead to legal or regulatory penalties.

The City Corporation's business role determines the type and nature of incidents that could occur and the impact they might have, so a risk-based approach is being used to shape incident management plans.

Control Measures:

	% Complete	Target Score	Actual Score
Incident Management	93%	4	4
Obtain senior management approval	100%	4	4
Provide specialist training	100%	4	4
Define the required roles and responsibilities	100%	4	4
Establish a data recovery capability	100%	4	4
Test the incident management plan	100%	4	4
Decide what information will be shared and with whom	75%	4	3
Collect and analyse post-incident evidence	75%	4	3
Conduct a lessons learned review	100%	4	4
Educate users and maintain their awareness	75%	4	3
Report criminal incidents to law enforcement	100%	4	4

6 - Managing User Privileges

The City Corporation needs to understand what level of access employees need to information, services and resources in order to do their job otherwise it won't be possible to manage rights appropriately. Failure to effectively manage user privileges could result in the following risks being realised:

- **Misuse of privileges:** Users could either accidentally or deliberately misuse the privileges assigned to them. This may result in unauthorised access to information to either the user or a third party or to unauthorised system changes having a direct security or operational impact.
- **Increased attacker capability:** Attackers may use redundant or compromised user accounts to carry out attacks and, if able, they may return to reuse the compromised account or possibly sell access to others. The system privileges provided to the original user of the compromised account will be available to the attacker to use which is why they particularly seek to gain access to highly privileged or administrative accounts.
- **Negating established security controls:** Where attackers have privileged system access they may make changes to security controls to enable further or future attack or might attempt to cover their tracks by making changing or audit logs.

Control Measures:

	% Complete	Target Score	Actual Score
Managing User Privileges	75%	4	3
Establish effective account management processes	100%	4	4
Establish policy and standards for user identification and access control	75%	4	3
Limit user privileges	75%	4	3
Limit the number and use of privileged accounts	75%	4	3
Monitor	75%	4	3
Limit access to the audit system and the system activity logs	50%	4	1
Educate users and maintain their awareness	75%	4	3

7 - Removable Media Controls

Removable media introduces the capability to transfer and store huge volumes of sensitive information as well as the ability to import malicious content. The failure to manage the import and export of information using removable media could expose the City Corporation to the following risks:

- **Loss of information:** Removable media is very easily lost, which could result in the compromise of large volumes of sensitive information stored on it. Some media types will retain information even after user deletion, placing information at risk where the media is used between systems (or when the media is disposed of)
- **Introduction of malware:** The uncontrolled use of removable media can increase the risk of introducing malware to systems.
- **Reputational damage:** The loss of media can result in significant reputational damage, even if there is no evidence of any specific data loss.

Control Measures:

	% Complete	Target Score	Actual Score
Removable Media Controls	89%	4	4
Produce corporate policies	50%	4	2
Limit the use of removable media	100%	4	4
Scan all media for malware	100%	4	4
Formally issue media to users	100%	4	4
Encrypt the information held on media	100%	4	4
Actively manage the reuse and disposal of removable media	100%	4	4
Educate users and maintain their awareness	75%	4	3

8 - Secure Configuration

Establishing and actively maintaining the secure configuration of systems should be seen as a key security control. Systems that are not effectively managed will be vulnerable to attacks that may have been preventable. Failure to implement good configuration and patch management can lead to the following risks:

- **Unauthorised changes to systems:** The protections you believe you have in-place may be changed by unauthorised individuals, either internal or external, leaving information at risk.
- **Exploitation of software bugs:** Attackers will attempt to exploit unpatched systems to provide them with unauthorised access to system resources and information. Many successful attacks exploit vulnerabilities for which patches have been issued but not applied.
- **Exploitation of insecure system configuration:** An attacker could exploit a system that has been poorly configured by:
 - gaining access to information they are not authorised to see
 - taking advantage of unnecessary user rights or system privilege
 - exploiting unnecessary functionality that has not been removed or disabled
 - connecting unauthorised equipment that is then able to compromise information or introduce malware
 - creating a back door to use in the future for malicious purposes

Control Measures:

	% Complete	Target Score	Actual Score
Secure Configuration	86%	4	3
Use supported software	80%	4	3
Develop and implement corporate policies to update and patch systems	100%	4	4
Create and maintain hardware and software inventories	80%	4	3
Manage your operating systems and software	100%	4	4
Conduct regular vulnerability scans	75%	4	3
Establish configuration control and management	75%	4	3
Disable unnecessary peripheral devices and removable media access	100%	4	4
Implement white-listing and execution control	100%	4	4
Limit user ability to change configuration	100%	4	4
Limit privileged user function	50%	4	2

9 - Home and Mobile Working

Mobile working and remote access extends the transit and storage of information (or operation of systems) outside of the corporate infrastructure, typically over the Internet. Mobile devices will also typically be used in spaces that are subject to additional risks such as oversight of screens, or the theft/loss of devices. If the City Corporation does not establish sound mobile working and remote access practices we might be vulnerable to the following risks:

- **Loss or theft of the device:** Mobile devices are highly vulnerable to being lost or stolen, potentially offering access to sensitive information or systems. They are often used in open view in locations that cannot offer the same level of physical security as your own premises.
- **Being overlooked:** Some users will have to work in public open spaces, such as on public transport, where they are vulnerable to being observed when working. This can potentially compromise sensitive information or authentication credentials.
- **Loss of credentials:** If user credentials (such as username, password, or token) are stored with a device used for remote working or remote access and it is lost or stolen, the attacker could use those credentials to compromise services or information stored on (or accessible from) that device.
- **Tampering:** An attacker may attempt to subvert the security controls on the device through the insertion of malicious software or hardware if the device is left unattended. This may allow them to monitor all user activity on the device, including authentication credentials.

Control Measures:

	% Complete	Target Score	Actual Score
Home and Mobile Working	71%	4	3
Asses the risks and create a mobile working security policy	75%	4	3
Educate users and maintain their awareness	75%	4	3
Apply the security baseline	100%	4	4
Protect data at rest	100%	4	4
Protect data in transit	75%	4	3
Review the corporate incident management plans	75%	4	3

10 - User Education and Awareness

Users have a critical role to play in helping to keep the City Corporation secure, but they must also be able to effectively do their jobs. If we do not effectively support employees with the right tools and awareness we are vulnerable to the following risks:

- **Removable media and personally owned devices:** Without clearly defined and usable policies on the use of removable media and personally owned devices, staff may connect devices to the corporate infrastructure that might lead to the inadvertent import of malware or compromise of sensitive information
- **Legal and regulatory sanction:** If users are not aware and supported in how they handle particular classes of sensitive information, the City Corporation may be subject to legal and regulatory sanction
- **Incident reporting culture:** Without an effective reporting culture there will be poor dialogue between users and the security team. This is essential to uncovering near misses and areas where technology and processes can be improved, as well as reporting actual incidents.
- **Security Operating Procedures:** If security operating procedures are not balanced to support how users perform their duties, security can be seen as a blocker and possibly ignored entirely. Alternatively, if users follow the procedures carefully this might damage legitimate business activity.
- **External attack:** Since users have legitimate system accesses and rights, they can be a primary focus for external attackers. Attacks such as phishing or social engineering attempts rely on taking advantage of legitimate user capabilities and functions.
- **Insider threat:** Changes over time in an employee's personal situation could make them vulnerable to coercion, and they may release personal or sensitive commercial information to others. Dissatisfied employees may try to abuse their system level privileges or coerce other employees to gain access to information or systems to which they are not authorised. Equally, they may attempt to steal or physically deface computer resources.

Control Measures:

	% Complete	Target Score	Actual Score
User Education and Awareness	75%	4	3
Produce a user security policy	75%	4	3
Establish a staff induction process	50%	4	2
Maintain user awareness of the cyber risks faced by the organisation	75%	4	3
Support the formal assessment of Information Assurance (IA) skills	100%	4	4
Monitor the effectiveness of security training	50%	4	2
Promote an incident reporting culture	75%	4	3
Establish a formal disciplinary process	100%	4	4

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