



Audit and Risk Management Committee

Date: WEDNESDAY, 13 JANUARY 2021

Time: 2.00 pm

Venue: VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

Members:

Alexander Barr (Chairman)	Deputy Jamie Ingham Clark (Ex-Officio Member)
Alderman Ian Luder (Deputy Chairman)	Paul Martinelli
Hilary Daniels (Deputy Chairman)	Caroline Mawhood (External Member)
Randall Anderson	Jeremy Mayhew (Ex-Officio Member)
Chris Boden	Deputy Andrien Meyers
Anne Fairweather	John Petrie
Marianne Fredericks (Ex-Officio Member)	Ruby Sayed
Alderman Prem Goyal	Dan Worsley (External Member)

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Accessing the virtual public meeting

Members of the public can observe this virtual public meeting at the below link:

<https://youtu.be/7LYGbZyCUvo>

This meeting will be a virtual meeting and therefore will not take place in a physical location following regulations made under Section 78 of the Coronavirus Act 2020. A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

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 and non-public summary of the previous meeting held on 3 November 2020.

For Decision
(Pages 1 - 8)

4. **OUTSTANDING ACTIONS OF THE COMMITTEE**
Member are asked to note the Committee's Outstanding Actions List.

For Information
(Pages 9 - 10)

5. **COMMITTEE WORK PROGRAMME**
Member are asked to note the Committee's Work Programme.

For Information
(Pages 11 - 12)

Internal Audit

6. **INTERNAL AUDIT PROGRESS REPORT**
Report of the Head of Audit and Risk Management.

For Information
(Pages 13 - 18)

7. **DRAFT INTERNAL AUDIT PLAN 2021-22**
Report of the Head of Audit & Risk Management.

For Decision
(Pages 19 - 24)

8. **INTERNAL AUDIT REVIEW OF OPERATIONAL PROPERTY MANAGEMENT - STATUS UPDATE**
Report of the Head of Audit & Risk Management.

For Information
(Pages 25 - 26)

Risk Management

9. **CORPORATE RISK MANAGEMENT STRATEGY**
Report of the Chamberlain.
(N.B. – To be read in conjunction with the non-public appendices at Item 15)

For Information
(Pages 27 - 60)

10. **DEEP DIVE: CR21 AIR QUALITY**
Report of the Director of Markets & Consumer Protection.
For Information
(Pages 61 - 84)
11. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
12. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
13. **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.
For Decision

Part 2 - Non-Public Agenda

14. **NON-PUBLIC MINUTES OF THE PREVIOUS MEETING**
To agree the non-public minutes of the previous meeting held on 3 November 2020.
For Decision
(Pages 85 - 86)

Risk Management

15. **CORPORATE RISK MANAGEMENT STRATEGY: NON-PUBLIC APPENDICES**
To be read in conjunction with the report at Item 9.
For Information
(Pages 87 - 100)
16. **DEEP DIVE REVIEW OF CR23 - POLICE FUNDING**
Joint report of the Chamberlain and the Commissioner of the City of London Police.
For Information
(Pages 101 - 108)

Governance

17. **EXTERNAL MEMBER: RECOMMENDATION FROM THE NOMINATIONS SUB-COMMITTEE**
Report of the Town Clerk & Chief Executive.
For Decision
(Pages 109 - 112)
18. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
19. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

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AUDIT AND RISK MANAGEMENT COMMITTEE

Tuesday, 3 November 2020

Minutes of the meeting of the Audit and Risk Management Committee held virtually on Microsoft Teams on Tuesday, 3 November 2020 at 2.00 pm

Present

Members:

Alexander Barr (Chairman)	Deputy Jamie Ingham Clark (Ex-Officio)
Hilary Daniels (Deputy Chairman - External)	Paul Martinelli
Alderman Ian Luder (Deputy Chairman - Member)	Caroline Mawhood (External Member)
Randall Anderson	Jeremy Mayhew (Ex-Officio)
Chris Boden	Deputy Andrien Meyers
Anne Fairweather	John Petrie
Marianne Fredericks (Ex-Officio)	Ruby Sayed
Alderman Prem Goyal	Dan Worsley (External Member)

In Attendance

Officers:

Chloe Rew	- Town Clerk's Department
Peter Lisley	- Town Clerk's Department
Janet Fortune	- Town Clerk's Department
Kerry Nicholls	- Town Clerk's Department
Justin Tyas	- Town Clerk's Department
Richard Woolford	- Town Clerk's Department
Peter Kane	- Chamberlain
Caroline Al-Beyerty	- Chamberlain's Department
Paul Dudley	- Chamberlain's Department
James Gibson	- Chamberlain's Department
Neilesh Kakad	- Chamberlain's Department
Chris Keesing	- Chamberlain's Department
Matthew Lock	- Chamberlain's Department
Steven Reynolds	- Chamberlain's Department
Sonia Virdee	- Chamberlain's Department
Ellen Wentworth	- Chamberlain's Department
Michael Cogher	- Comptroller & City Solicitor
Paul Double	- City Remembrancer
Bruce Hunt	- Remembrancer's
Sarah Phillips	- Remembrancer's / Town Clerk's Department
Paul Wright	- Remembrancer's
Paul Wilkinson	- City Surveyor
Jon Avern	- Director of Markets & Consumer Protection

Also in attendance:

Kerry Barnes	- External Auditor, BDO
Fiona Condron	- External Auditor, BDO
James Hay	- External Auditor, BDO
Leigh Lloyd-Thomas	- External Auditor, BDO
Francesca Palmer	- External Auditor, BDO

1. APOLOGIES

There were no apologies.

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

There were none.

3. MINUTES OF THE PREVIOUS MEETING

RESOLVED, that – the public minutes and non-public summary of the meeting held on 1 October 2020 be agreed as a correct record.

4. OUTSTANDING ACTIONS OF THE COMMITTEE

Members received the list of outstanding actions. The following point was noted:

- CR209 had been incorporated into the workplan and a deep dive would be presented to the Committee on 25 May 2021.

5. COMMITTEE WORK PROGRAMME

Members received the Committee Work Programme. The following points were noted:

- The City Surveyor's Physical Property risk would be added to the work programme.
- May 2021: The two deep dives marked as 'tbc' would be confirmed in due course.

6. 2019-20 CITY FUND AND PENSION FUND FINANCIAL STATEMENT

Members considered a report of the Chamberlain relative to the 2019/20 City Fund and Pension Fund Financial Statement. The Chamberlain noted that the accounts were in good financial position at end of last year and that surpluses were planned which would be used towards financing major projects. Furthermore, there was considerable underspend on the budget as a result of business rates retention across London and the London pool, which had come in nearly £11M better than forecast. Deficits from previous years were balanced by surpluses.

With respect to the BDO report, it was noted that bank reconciliation (£126k) needed to be balanced. The audit work was impacted by related party transactions and Members' declarations which had not been disclosed by all Members.

With respect to delegations on further changes, the Chamberlain planned to meet with the Chairman and Deputy Chairman of Finance Committee to discuss the draft statements prior to their presentation to the Finance Committee. The report was accompanied by the BDO audit completion report.

RESOLVED, that – Members agree to:

1. consider the content of BDO's audit progress report;
2. recommend approval of the 2019-20 City Fund and Pension Fund Statement of Accounts to Finance Committee; and,
3. delegate authority to the Chamberlain, in consultation with the Chairman and Deputy Chairman of the Audit and Risk Management Committee, approval of any material change to the financial statement required before the signing of the audit opinion by BDO, which is expected by the end of November.

7. CITY'S CASH FINANCIAL STATEMENTS 2019/20

Members considered a report of the Chamberlain relative to the City's Cash Financial Statements for 2019/20. BDO presented the audit report and the matter of outstanding related party transactions and Members' declarations was discussed with respect to the audit report, emphasising the importance of complete and accurate disclosures from Members.

RESOLVED, that – Members:

1. note that the external auditor BDO LLP intends to give an unqualified audit opinion;
2. consider the contents of the Audit Management Report issued by BDO LLP; and,
3. recommend approval of the City's Cash Financial Statements for the year ended 31 March 2020 to the Finance Committee.

8. CITY'S CASH TRUST FUNDS AND SUNDRY TRUST FUNDS ANNUAL REPORT AND FINANCIAL STATEMENTS 2019/20

Members considered a report of the Chamberlain Relative to the City's Cash Trust Funds and Sundry Trust Funds Annual Report and Financial Statements 2019/20. BDO noted that audit work on the sundry trusts was ongoing. With respect to the efficiency of the process, the Chamberlain noted that whilst there was room for improvement to make the process more efficient, the Chamberlain was satisfied with the way the accounting and audit work was carried out given the transition to working remotely due to COVID-19.

RESOLVED, that – Members:

1. note that the external auditor BDO LLP intends to give an unqualified audit opinion;
2. consider the contents of the Audit Management Report issued by BDO LLP; and
3. recommend approval of the Annual Reports and Financial Statements for the City's Cash Trust Funds and the Annual Reports and Financial Statements for the Sundry Trust Funds for the year ended 31 March 2020 to the Finance Committee.

9. **INTERNAL AUDIT UPDATE - AMENDED INTERNAL AUDIT PLAN 2020/21**

Members received a report of the Head of Audit and Risk Management relative to the Internal Audit Update and amended Internal Audit Plan for 2020/21. The plan had been revised to account for a number of organisational and operational changes, including the organisational response to the pandemic, officer capacity in the internal audit team, and the early retirement scheme.

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

10. **ANTI-FRAUD & INVESTIGATIONS - 2020/21 UPDATE REPORT**

Members received a report of the Head of Audit and Risk Management relative to Anti-Fraud and Investigations updates for 2020/21. Some of the anti-fraud work had a change in focus during the year, as the team was supporting the administration of COVID-19 business grants through a programme of post-payment assurance activity. With respect to questions on the status of housing tenancy fraud, this information would be circulated to Members following the meeting as the Corporate Anti-Fraud Manager did not have this information to hand.

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

11. **CORPORATE RISK MANAGEMENT STRATEGY**

Members received a report of the Chamberlain relative to the Corporate Risk Management Strategy. Members expressed concern that some of the Corporation's semi-independent entities struggled to maintain a risk register, which may have broader implications on overall risk management across the Corporation.

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

*** Members agreed to extend the meeting ***

12. **DEEP DIVE RISK REVIEWS**

12 a) Deep Dive: CR09 Health, Safety and Wellbeing

Members received a report of the Director of Human Resources relative to a Deep Dive of CR09 Health, Safety and Wellbeing (HSW). HSW had been reviewed to incorporate remote working environments, as many employees had been working from home throughout the pandemic. The individual risk assessment process allowed officers to consider their individual circumstances with respect to returning to the workplace and for those officers who continued to work at their usual place of work throughout the pandemic.

Members queried the risk score. The Director noted that the aim was to reduce likelihood, however the impact would remain the same. The Chairman queried this and noted that in general target impact scores should aspire to being less, due to the ameliorating effect of mitigation measures. The target risk score would be amended (and it was confirmed subsequent to the meeting that this had been completed).

Members expressed concern that resources had been diverted from other areas to modify work environments to ensure they are COVID secure, which could potentially create risks elsewhere. The Director advised that resources were reallocated on a priority basis as staff safety is HR's the City Corporations top priority.

Members questioned why the HSW risk was owned by the Director of HR. The Director noted that the risk related to the Health Safety and Wellbeing Management System and that there were corporate mechanisms in place to escalate risks where necessary.

Members asked what was in place to support staff mental health and wellbeing. The Director advised that a number of mechanisms were in place to ensure officers could express concerns, including occupational health, mental health first aiders network and the employee assistance programme. The Director reported that a series of mental health and wellbeing campaigns were being run to engage officers and remind them of support networks.

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

12 b) Deep Dive: CR10 Adverse Political Developments

Members received a report of the City Remembrancer relative to a Deep Dive of CR10 Adverse Political Developments. The Remembrancer drew attention to the UK Government's response to the pandemic. He noted the likelihood of there being a post pandemic government inquiry and also the government's manifesto commitment to undertake a constitutional review. The prospect of the local government arrangements in London being subject to critical examination as part of that process could not be discounted.

A member queried why the Brexit risk had a low rating. The Remembrancer advised that the timeline for the risk on the City as a financial centre being realised was not an immediate one, assuming it arose. The risk would become apparent over years as a process of leaching took place. This was beyond the period for which a meaningful assessment of risk could be assessed. He had taken two parliamentary terms as a working model.

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

13. UPDATE ON SMITHFIELD CANOPIES AND SUBSEQUENT REMEDIAL WORK

*** Item 13 was addressed following Item 5 Committee Work Programme. ***

Members received a report of the City Surveyor, for discussion with the City Surveyor and the Director of Markets & Consumer Protection in respect of an update on the Smithfield canopies and subsequent remedial work to address safety concerns around the site.

The Chairman emphasised that the key issue for the Audit and Risk Management Committee was to ensure that risks were identified, and internal controls were in place to manage risks. Markets Committee would focus on the details of the events.

The Director of M&CP and the City Surveyor noted that works were underway to address safety concerns at the site. Some delays to works were related to the bespoke measurements to cover the necessary areas, and further surveys would be carried out for the other markets to ensure they were safe to operate.

The Director of M&CP noted that the risk assessment exercises which were conducted as a result of the incidents demonstrated the need for greater risk ownership, and confirmed that more robust arrangements would be put in place. The Head of Audit and Risk Management would be working with both departments to conduct an internal audit and identify risk ownership amongst the departments, and this matter would be considered by the Committee in March 2021.

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

14. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

There were none.

15. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

The Chairman advised the Committee that he wrote to the Town Clerk regarding not being notified of the incidents at the markets. The Town Clerk responded noting that he wrote to the City Surveyor with respect of this and would remind Chief Officers of their responsibility for reporting.

16. 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.

17. NON-PUBLIC MINUTES OF THE PREVIOUS MEETING

RESOLVED, that – the non-public minutes of the meeting held on 1 October 2020 be agreed as a correct record.

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

There were none.

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

There were two matters of other business.

The meeting ended at 17:07

Chairman

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AUDIT AND RISK MANAGEMENT COMMITTEE - Outstanding Actions – January 2021

Items from meeting held 3 November 2020		
ITEM	Action	Officer and target date
15. ANTI-FRAUD AND INVESTIGATIONS – 2020/21 UPDATE REPORT	Corporate Anti-Fraud Manager to provide further information on the status of housing tenancy fraud cases following the meeting.	Corporate Anti-Fraud Manager COMPLETED
13. UPDATE ON SMITHFIELD CANOPIES AND SUBSEQUENT REMEDIAL WORKS	Head of Audit and Risk Management to conduct internal audit of the Department for Markets & Consumer Protection and the City Surveyor's Department to determine risk ownership.	Head of Audit and Risk Management/ City Surveyor/ M&CP Date: 23 March 2021 (added to workplan)

Items from meeting held 1 October 2020		
ITEM	Action	Officer and target date
14. Deep Dive – CR29: Information Management	Update to be brought to Committee regarding actions taken to address the risks associated with the Information Management Strategy (2018-2023) not fully being implemented.	Town Clerk/Chamberlain Date: 21 September 2021 (added to workplan)

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Audit & Risk Management Committee - Work Programme: January - July 2021

13 January 2021	23 March 2021	25 May 2021	13 July 2021
<u>Accounts:</u>	<u>Accounts:</u>	<u>Accounts:</u>	<u>Accounts:</u>
<u>Deep Dive:</u> 1. CR23 Police Funding (Chamberlain's/COLP) 2. CR21 Air Quality (M&CP)	<u>Deep Dive:</u> 1. CR17 Safeguarding (DCCS) 2. CR35 Medium-Term Financial Plan (Chamberlain's)	<u>Deep Dive:</u> 1. CR16 Information Security (Chamberlain's) 2. CR34 COVID-19 (Town Clerk's)	<u>Deep Dive:</u> 1. CR30 Climate Action (Town Clerk's) 2. CR33 Major Capital Schemes (Town Clerk's/ City Surveyor)
<u>Risk Management:</u> Risk Management Update	<u>Risk Management:</u> Special Report – Operational Property, City Surveyor	<u>Risk Management:</u> Risk Management Update Risk Management Strategy CR28 Action Fraud Update	<u>Risk Management:</u> CR32 Wanstead Park Update

<u>Internal Audit and Anti-Fraud:</u> Internal Audit Update (9-month plan delivery) Draft 2021/22 Internal Audit Plan Audit Report on Operational Buildings	<u>Internal Audit and Anti-Fraud:</u> Internal Audit Update (Provisional 12-month plan delivery outturn)	<u>Internal Audit and Anti-Fraud:</u> Internal Audit Update (12-month plan delivery) Head of Internal Audit Annual Opinion Anti-Fraud and Investigations Annual Report	<u>Internal Audit and Anti-Fraud:</u>
<u>Governance:</u> External Member Recommendations from the Nominations Sub-Committee	<u>Governance:</u> Annual Report of the Committee Annual Review of the Audit Charter	<u>Governance:</u>	<u>Governance:</u> Annual Governance Statement
<u>External Inspections:</u>	<u>External Inspections:</u>	<u>External Inspections:</u>	<u>External Inspections:</u>

Committee(s)	Dated:
Audit and Risk Management Committee	13/01/2021
Subject: Internal Audit Progress Report	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	N/A
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Head of Audit and Risk Management	For Information
Report author: Matt Lock	

Summary

This report provides an update on Internal Audit activity since the last Internal Audit Update Report presented to this Committee in October 2020. The report summarises work completed and progress against the 2020/21 Internal Audit Plan. Delivery of which has been indirectly impacted by the Coronavirus pandemic.

Finally, the report describes the findings of Audit follow-up work completed to verify the implementation of Audit recommendations.

Recommendation(s)

Members are asked to:

- Note the report.

Main Report

Background

1. This report provides a cumulative update on the work of Internal Audit since 1 April 2020, building on the progress report made to the last update provided to the Audit and Risk Management Committee on 1 October 2020. The report also summarises the findings of work completed since the July update.

Current Position

2. 9 Final Audit Reports have been issued since the October update, bringing the total to 28 since 1 April 2020. 3 Green Assurance ratings was given, 5 Amber Assurance ratings and one Red Assurance Rating. Those audit reviews are summarised in the table below:

Department/Audit	Assurance Rating	Recommendations Made		
		Red	Amber	Green
Barbican Centre - Bars	Amber	0	5	1
Barbican Centre - Corporate Membership and Sponsorship	Amber	0	3	1
Chamberlain's IT - Legacy Technology	Red	1	1	1
City of London Police - Grant Funding	Green	0	0	0
City of London Police - Workforce Planning	Green	0	0	5
Community and Children's Services - Housing Tenancies	Amber	0	2	5
Community and Children's Services - Housing Safety	Amber	0	3	2
Corporate Wide - Asset Management	Amber	0	1	2
Guildhall School of Music and Drama - Internationalisation	Green	0	0	2

3. Appropriate management action plans are in place to address recommendations made, the Red recommendation raised relates to the following:

Chamberlain's IT – Legacy Technology (one Red Recommendation)

4. The primary focus of this review was to examine the adequacy of arrangements in place to manage risks associated with the continued operation of legacy technology (IT applications and hardware that are outside of mainstream support). Legacy technology creates a maintenance overhead, undermines network security and carries a greater degree of risk around breaks in operational continuity.
5. The Red recommendation raised in this review was in relation to the migration of the last remaining technology from the Agilisys IaaS (Infrastructure as a Service) servers to appropriate alternate cloud servers. This relates to the telephony system, where a wider solution is being developed as part of a telephony upgrade project, while the IT Director undertook to resolve this issue by February 2021, when the IaaS data centre is scheduled to close, there is a risk this timescale will not be met.
6. The remaining recommendations were in respect of the documentation maintained to record all legacy technology and the roadmap plan of action to remove this.

Delivery of Planned Internal Audit Work

7. As reported to this Committee previously, delivery of the 2020/21 Internal Audit Plan has been impacted by the COVID-19 outbreak. Work is now progressing at pace and the team is making good progress against the revised plan agreed at the November meeting.
8. In addition to the finalised audits referred to above, work is in progress for 26 planned audit reviews, 8 of which are substantially complete (including 4 at draft report stage). We continue to have a greater number of reviews simultaneously in

progress than we would ordinarily, mitigating the impact on overall productivity of delays in the completion of work.

9. I am fully confident that the team will complete sufficient work to be able to inform the Head of Audit Annual Opinion.

Internal Audit Follow-up Activity

10. Since the October update, follow-up reviews have been undertaken in relation to 25 Internal Audit Reviews to assess progress in the implementation of Audit recommendations. The outcome of those reviews is summarised below:

- In 12 cases, all recommendations were found to be implemented, resulting in a Green revised assurance opinion
- In 13 cases the follow-up review found that not all recommendations had been implemented, subsequent follow-up reviews will be undertaken.

11. While in some instances it has been necessary to undertake 2nd or 3rd follow-up reviews, the design of the process has proven highly effective, with all outstanding issues being resolved without the need to make any escalations to this Committee.

12. The full summary of outcomes from follow-up activity and the forward plan of follow-up work is shown at Appendix 1.

Corporate & Strategic Implications

13. The Internal Audit Plan is designed to provide assurance as to the adequacy of the City of London Corporation's systems of internal control and governance. This programme of activity is aligned with the Corporate Plan, Corporate Risk Register and Departmental Top Risks.

Conclusion

14. After initial delays to the delivery of work against the 2020/21 Internal Audit Plan as a result of the COVID-19 pandemic, Internal Audit Work is now progressing at pace. The Head of Audit and Risk Management is confident that sufficient work will be completed this year to inform the Annual Opinion.

Appendices

- Appendix 1 – Follow-up Programme of Activity

Matt Lock

Head of Audit and Risk Management, Chamberlain's Department

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				Recommendations Made				Follow-up Outcome				
								Outstanding Issues				
Department	Audit	Lead Auditor	Assurance Rating	Red	Amber	Green	Follow-up Date	Red	Amber	Green	Total Oustand ing Recs	Current Assurance Rating (30 June 2020)
Barbican Centre	DATA SECURITY	Nirupa	Amber	0	2	4	Completed	0	0	0	0	Green
Barbican Centre	COMMERCIAL EVENTS	Nirupa	Green	0	0	0	Completed	0	0	0	0	Green
Chamberlain's	IT - MOBILE DEVICES	Nirupa	Amber	0	8	3	Completed	0	0	0	0	Green
Chamberlain's	COUNCIL TAX	Nirupa	Green	0	0	1	Completed	0	0	0	0	Green
City of London School	SCHOOL FEES	Nirupa	Green	0	1	1	Completed	0	0	0	0	Green
City Surveyors	COMMERCIAL LEASES	Cirla	Amber	0	3	1	Completed	0	0	0	0	Green
City Surveyors	CLFS ENABLING WORKS	Ryan	Red	4	0	0	Completed	0	0	0	0	Green
Community and Children's Services	ASYLUM SEEKERS	Martha	Red	4	5	0	Completed	0	0	0	0	Green
Corporate Wide	CORPORATE-WIDE BUDGETARY CONTROL	Ryan	Amber	0	2	0	Completed	0	0	0	0	Green
Guildhall School	STUDENT PETTY CASH	Ryan	Green	0	3	8	Completed	0	0	0	0	Green
Town Clerk's	ECONOMIC DEVELOPMENT	Nirupa	Amber	0	4	1	Completed	0	0	0	0	Green
Town Clerk's	RESPONSIBLE BUSINESS STRATEGY	Nirupa	Amber	0	4	0	Completed	0	0	0	0	Green
Guildhall School	INCOME GENERATION	Cirla	Amber	0	3	0	Completed	0	0	0	0	Green
Chamberlain's	CORPORATE-WIDE - SUPPLIERS FINANCIAL HEALTH/RESILIENCE	Ryan	Amber	0	6	2	Completed	0	0	0	0	Green
City of London Police	FLEET STREET	Ryan	Amber	0	2	0	Completed	0	0	0	0	Green
Barbican Centre	BARBICAN RETAIL AND BARS	Martha	Amber	1	9	1	Completed	0	0	0	0	Green
Chamberlain's	PROCESS MAPS	Jerry	Green	0	0	4	Completed	0	0	0	0	Green
City of London Police	INTERPRETERS FEES	Jerry	Amber	0	2	2	Completed	0	0	0	0	Green
City of London School for Girls	BUDGET ESTIMATING	Cirla	Amber	0	2	0	Completed	0	0	0	0	Green
Barbican Centre	FRAUD RISK MANAGEMENT	Ryan	Amber	0	7	4	Completed	0	0	0	0	Green
Markets and Consumer Protection	HARC and Animal Welfare	Nirupa	Amber	0	5	6	Completed	0	0	0	0	Green
Built Environment	PROJECT TEAM	Jerry	Green	0	1	0	Completed	0	0	0	0	Green
Barbican Centre	FINANCIAL MONITORING	Jerry	Green	0	0	2	Completed	0	0	2	0	Green
Open Spaces	MAJOR INCIDENT PLANNING	Jerry	Green	0	0	1	Completed	0	0	0	0	Green
Chamberlain's	CORPORATE -WIDE - COMMERCIAL MANAGER SCORECARD PROCEDURES	Ryan	Amber	0	6	4	Jun-20	0	3	0	3	Amber
City of London Freemens School	CYBER SECURITY	Nirupa	Red	3	11	0	Jun-20	1	3	0	4	Amber
Open Spaces	KEATS HOUSE - INCOME AND EXPENDITURE	Martha	Amber	1	1	5	Aug-20	1	1	5	7	Amber
Barbican Centre	STRATEGIC PLANNING, MONITORING & IMPLEMENTATION	Martha	Amber	0	2	0	Sep-20	0	1	0	1	Amber
Built Environment	CORPORATE-WIDE HIGHWAYS REPAIRS AND MAINTENANCE CONTRACT	Ryan	Green	0	1	0	Sep-20	0	1	0	1	Green
City of London School	CYBER	Nirupa	Red	2	11	0	Sep-20	0	1	0	1	Amber
City of London School	HEALTH & SAFETY	Cirla	Amber	0	2	0	Sep-20	0	2	0	2	Amber
Town Clerk's	HUMAN RESOURCES - STAFF SICKNESS MANAGEMENT	Martha	Amber	0	3	1	Sep-20	0	3	1	4	Amber
City of London Freemens School	CLFS - KEY FINANCIAL CONTROLS	Martha	Amber	0	2	0	Sep-20	0	1	0	1	Green
Aldgate School	KEY CONTROL PROCESSES	Martha	Amber	0	5	1	Oct-20	0	1	1	2	Amber
City of London School for Girls	CYBER SECURITY	Nirupa	Red	3	12	1	Oct-20	0	3	0	3	Amber
Guildhall School	BUDGET-SETTING & FINANCIAL MANAGEMENT	Cirla	Amber	0	1	1	Oct-20	0	1	1	2	Amber
Chamberlain's	IT ASSET MANAGEMENT	Nirupa	Amber	0	17	4	Dec-20	0	0	1	1	Green
City of London Police	FRONT DESKS	Jerry	Amber	1	4	0	Jan-21					
Open Spaces	Income collection and Banking	Nirupa	Amber	0	5	5	Jan-21					
Town Clerk's	PUBLIC SECTOR EQUALITIES DUTY	Jerry	Amber	0	3	1	Jan-21					
Aldgate School	CASS CHILDREN & FAMILY CENTRE	Ryan	Amber	0	1	0	Jan-21					
City Surveyors	FRAUD RISK MANAGEMENT	Ryan	Amber	0	3	1	Jan-21					
City Surveyors	FIRE SAFETY RISK MANAGEMENT	Ryan	Amber	0	6	1	Jan-21					
Barbican Centre	EVENTS CONTRACTING (INCLUDING CANCELLATION ARRANGEMENTS)	Cirla	Amber	0	1	7	Jan-21					
Chamberlain's	MAZARS - ITIL SERVICE DESK	Nirupa	Green	0	0	3	Jan-21					
Chamberlain's	MAZARS - SHAREPOINT	Nirupa	Amber	0	3	1	Jan-21					
Chamberlain's	MAZARS - FIREWALL/VPN	Nirupa	Green	0	1	1	Jan-21					

				Recommendations Made				Follow-up Outcome				
								Outstanding Issues				
Department	Audit	Lead Auditor	Assurance Rating	Red	Amber	Green	Follow-up Date	Red	Amber	Green	Total Outstand ing Recs	Current Assurance Rating (30 June 2020)
Guildhall School	FRAUD RISK MANAGEMENT	Ryan	Amber	0	6	1	Jan-21					
Chamberlain's	MAZARS - Software Development Life Cycle (SDLC)	Nirupa	Red	1	1	0	Jan-21					
Chamberlain's	NNDR	Nirupa	Green	0	0	2	Apr-21					
Barbican Centre	ARTISTIC EVENTS DECISION-MAKING & EVALUATION	Cirla	Green	0	0	0	Not required	0	0	0	0	Green
City of London Police	TRANSFORM CHANGE PROGRAMME PHASE 1	Jerry	Green	0	0	0	Not required	0	0	0	0	Green
City of London School for Girls	SCHOOL EXPANSION PROJECT	Ryan	Amber	N/A	N/A	N/A	Not required	N/A	N/A	N/A	N/A	N/A
Community and Children's Services	BUDGET-SETTING & FINANCIAL MONITORING	Cirla	Green	0	0	0	Not required	0	0	0	0	Green
Comptroller and City Solicitor	MANAGEMENT OF FREEDOM OF INFORMATION REQUESTS	Jerry	Green	0	0	1	TBC					
Corporate Wide	GDPR COMPLIANCE	Jerry	Amber	0	1	1	TBC					

Committee(s)	Dated:
Audit and Risk Management Committee	13/01/2021
Subject: Draft Internal Audit Plan 2021-22	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	N/A
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Head of Audit and Risk Management	For Decision
Report author: Matt Lock	

Summary

The overall level of resource available for Internal Audit activity will be reduced in 2021/22 as part of the Corporate wide efficiency savings. With further streamlining of the Audit process and the support and engagement of Chief Officers to ensure greater efficiency, the Internal Audit Team will be sufficiently resourced to deliver a programme of work to enable the Head of Audit and Risk Management to provide an overall opinion on the effectiveness of the City of London Corporation's control, governance and risk management frameworks. The 2021/22 plan has been prepared with a greater degree of flexibility than in previous years to accommodate the impact of the implementation of the Target Operating Model and the continued uncertainty resulting from the COVID-19 pandemic.

The Audit Plan is being developed to align to the Corporate Plan, seeking to provide assurance that controls in place support the delivery of Corporate Outcomes.

Recommendation(s)

Members are asked to:

- Review the proposed Internal Audit Plan for 2021/22 as set out in Appendix 1 and consider the extent to which:
 - The plan covers the organisation's key risks as they are recognised by Audit and Risk Management Committee
 - The plan incorporates the areas that Audit and Risk Management Committee believe should be covered as priority
- Agree, subject to the above, the 2021/22 Draft Internal Audit Plan

Main Report

Background

1. The Internal Audit function is largely provided by a small in-house team (representing 780 audit days) with a small financial budget to buy in additional resource (representing approximately 50 audit days). The required 12% efficiency savings for 2021/22 have been made by reducing the budget available for the purchase of additional resources, the retained element being for the provision of more specialist work such as IT Audit. This aligns with a move back towards a slightly larger in-house team, with an increase in Senior Auditor resource and a reduction in Audit Management. The availability and quality of the 3rd party provision has been variable and the level of coordination required has made operations over the past 12-18 months more challenging, a continuation of this would be detrimental to achieving the required efficiency of a more streamlined process.
2. Internal Audit is required to provide the S151 Officer, the Senior Leadership Team and the Audit and Risk Management Committee with an opinion on the adequacy and effectiveness of the organisation's governance, risk management and control arrangements. This opinion is predominantly based on the outcomes from the audit work undertaken each year. The Audit and Risk Management Committee is provided with regular updates on the outcomes of completed audit work and the implementation of recommendations made.

Current Position

3. The Audit Plan for 2021/22 is being developed to align to the Corporate Plan and the achievement of strategic objectives, there are a number of significant factors that impact the plan for the coming year, referred to in the paragraphs below.
4. The organisational transformation programme that is resulting from implementation of a new Target Operating Model will require Internal Audit to change the structure of the Audit Universe to align to the new Organisation. It is proposed that this change is reflected in 2022/23 rather than the forthcoming plan allowing time for delivery of the TOM changes. Recognising the scale of the changes, particularly at a Chief Officer level, it is intended to undertake a narrower Chief Officer consultation, with the plan being drawn largely from the existing Audit Universe, (our 3-year Strategic Audit Plan). The Strategic Plan gives consideration to the Corporate Risk Register, existing departmental business plans and departmental risk registers and so captures the key elements of the City Corporations operations. It is proposed that, with the exception of the existing institutions where a separate Audit Committee is in operation, Chief Officer consultation be focussed through Summit Group and then on an exception only basis.
5. The COVID-19 pandemic still results in significant uncertainty around the extent to which certain service areas will be fully operational in 2021, which impacts some of the work that Internal Audit may meaningfully undertake. The response to the pandemic has driven a number of technological advances, which has impacted the IT security landscape and increased external threat in this regard, IT security will form a substantial element of the IT Audit Plan.

6. We must also give due regard to Brexit implications; in the absence of certainty, we must be prepared to provide an agile and responsive Internal Audit service in response to emerging risks and issues.
7. In light of the above, the 2021/21 Internal Audit Plan has been developed to include approximately 9 months activity. This plan focusses on the core elements that will drive the annual opinion, with the remaining work programme to be developed as both situations progress.
8. The draft Internal Audit Plan for 2021/22 is attached as Appendix 1 to this report. It should be noted that this Plan, as formalised, is an early draft and may be subject to some amendment before the final Plan is published in March 2021. It should be noted that the Internal Audit Plan is ordinarily kept under review and amended as changes in priorities arise during the course of a year, this is key to ensuring continued relevance.

Prioritisation

9. A 4-tier prioritisation methodology was agreed by this Committee in March 2020 as follows,:
 - **Priority 1:** activity that directly links to Corporate Plan Outcomes and/or Corporate Risks, completion of this work within 2021/22 is considered essential to providing the annual opinion.
 - **Priority 2:** activity that is more closely aligned to the delivery of top-level departmental objectives or risks and key corporate systems. Periodic audit coverage is considered sufficient to inform the annual opinion, auditable areas are identified from a rolling 3 year programme.
 - **Priority 3** – lower risk activity where the risk of non-delivery of objectives may be contained at a departmental level, includes advisory assurance work. Periodic audit coverage is considered useful in informing the annual opinion, auditable areas are, again, identified from a rolling 3 year programme. Any P3 work not delivered in year will be considered for escalation to P2 for the subsequent year.
 - **Priority 4** – activity that is focussed on local business objectives and of low financial materiality, risk/impact of failing to deliver objectives may be contained at a service level. Any P4 work not delivered in year will be considered for escalation to P3 for the subsequent year.
10. It should be noted that, in the interests of maintaining flexibility within the audit plan and ensuring that resources are applied to the work of most significance, no P3 or P4 work has been included at this stage.

Corporate & Strategic Implications

11. The Internal Audit Plan is designed to provide assurance as to the adequacy of the City of London Corporation's systems of internal control and governance. This programme of activity is aligned with the Corporate Plan, Corporate Risk Register and Departmental Top Risks.

Conclusion

12. The 2021/22 Internal Audit Plan does not allocate fully the resources available for the year: the plan includes flexibility to accommodate changes resulting from the implementation of the TOM and continued uncertainty in resulting from the COVID-19 Pandemic and disruption to City of London Corporation services. The plan will be reviewed on an ongoing basis and, as more certainty is realised, the remainder of the plan will be developed.
13. Chief Officer Consultation will be lighter touch for 2021/22, reflecting the extent of organisational change in progress. Reliance has been placed on the 3-year Strategic Internal Audit Plan and mid-year planning discussions held in 2020/21. The 2021/22 Internal Audit Plan aligns with the Corporate Plan and gives due consideration to the Corporate Risk Register and significant departmental risks.

Appendices

- Appendix 1 – Draft Internal Audit Plan 2021/22
- Appendix 2 – Audit Universe (Hyperlink available to Members on request)

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Department	Auditable Area	Potential Scope	Audit Days	Priority	Corporate Plan Ref	Corporate Risk Ref
Chamberlain's	Payroll	Compliance testing, application and effectiveness of key controls (starters, leavers, permanent and temporary adjustments to pay)	20	1		
Chamberlain's	Accounts Payable	Compliance testing, application and effectiveness of key controls	15	1		
Chamberlain's IT	IT Programme to be determined (4 reviews)	IT Audit Plan to be developed subject to consultation, key risk areas in relation to cyber threat, transformation/new ways of working, information management and project delivery	40	1		
City of London Police	Police Audit Plan to be Determined (approximately 8 reviews)	Subset of the overall plan allocated to Police activity, to be developed under the oversight of the Police Performance and Resource Management Committee. A significant element of the plan to cover the Transform programme, other key areas of interest are Force and Member governance.	130	1		CR23
Corporate Wide	Follow-up on Internal Audit Recommendations	Allocation of time to cover the follow-up audit work in relation to recommendations implementation	100	1		
Corporate Wide	Risk Management	Effectiveness and Maturity Review	20	1		
Corporate Wide	Safeguarding	Framework in place to ensure that the City Corporation is effective in meeting its safeguarding responsibilities	15	1	Outcome 1	CR17
Corporate Wide	Infrastructure/Physical Security	Assurance as to delivery of the Security programme to make the City safer, building resilience to natural and man made threats.	15	1	Outcome 1 and 12	CR24 CR01
Corporate Wide	Climate Action	Assurance on the effectiveness of Climate Action; the impact of controls/management action, implementation of strategy	15	1	Outcome 11	CR30 CR21
Corporate Wide	Major Projects Governance Arrangements	Review of the adequacy of governance arrangements within the City Corporation for delivery and oversight of the Major Projects	15	1	Outcomes 3, 4 and 7	
Corporate Wide	Performance Management/Delivery of Business Plan Objectives (time allocation TBC)	Theme to apply across all departments, data validation, assurance on completeness and depth of business planning - coverage across the organisation on a rolling basis over 3 years, delivery of this work is subject to TOM outcomes	15	1		
Town Clerks	Innovation and Growth - Partnerships and Engagement	Review of mitigating actions to CR02, the programme of work of Innovation and Growth and outcomes delivered from this activity, including partnership arrangements	15	1	Outcomes 5, 6 and 7	CR02
Town Clerks	Corporate wide - Emergency Planning	Lessons learned from Pandemic Response	20	1		CR01
Town Clerks	City Bridge Trust - Grants Administration and Compliance with Strategy	Application of key controls within the grant administration process; awarding grants, monitoring compliance with conditions of grants, delivery of outcomes in alignment with strategy, overall financial management and fraud risk management	15	1		

Department	Auditable Area	Potential Scope	Audit Days	Priority	Corporate Plan Ref	Corporate Risk Ref
Barbican Centre	Barbican Centre Plan to be determined in consultation with Barbican Finance and Risk Committee (approx 4 reviews)	likely to include lessons learned from COVID response, recovery plan and resilience over the medium term, plus a subset of compliance/key control work.	40	2		
Chamberlain's	Procurement Category Management - Governance and Effectiveness	Assurance on the operational effectiveness of procurement governance, outcome focussed	7	2		
Community and Children's Services	Housing Rents	Completeness and accuracy of billing, collection of rent, debt management	10	2		
Corporate Wide	P-Cards	a rolling programme of activity (exlcuding the Police) will target 5 departments each year	25	2		
Guildhall School of Music and Drama	Governance	Review of governance arrangements, inline with industry and regulator expectations and requirements	12	2		
Guildhall School of Music and Drama	Data Futures	(tbc) Readiness for and compliance with HESA's Data Futures transformation programme	12	2		
Guildhall School of Music and Drama	Balance of Plan days to be allocated/determined in consultation with Guildhall School Audit and Risk Committee	To be determined	26	2		
Open Spaces Department	Entity Review	Sites to be covered on a rolling basis, priorities to be determined with Director of Open Spaces, looking at key controls and operations. Subject to being operationally viable	15	2		
Open Spaces Department	Department Wide - Lodges	Management/operation of the lodges, including rental income	12	2		
Open Spaces Department	Department Wide - Commercial Leases	Management and operation of commercial leases, including the extent to which these are fit for purpose	8	2		
Open Spaces Department	Tower Bridge - Exhibition Income	Ticket income, collection, banking, reconciliation and related income controls, including fraud risk - subject to being operationally viable	12	2		
Remembrancers	Supplies and Services	Expenditure controls, contract/supplier management	8	2		
Town Clerks	Guildhall Art Gallery - Income and Expenditure	Income and expenditure controls, includes operation of shop (e.g. stock control)	12	2		
Town Clerks	Guildhall Club Accounts	Annual audit of accounts	5	n/a	n/a	n/a
Total Audit Days			654			
Resources available			820			
Balance to be allocated:			166			

Committee(s)	Dated:
Audit and Risk Management Committee	13/01/2021
Subject: Internal Audit Review of Operational Property Management – Status update	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	N/A
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Head of Audit and Risk Management	For Information
Report author: Matt Lock	

Summary

The Internal Audit review of Operational Property Management is progressing, work has been paused to allow consultation with the Town Clerk and Chief Executive and the City Surveyor in relation to initial findings. A more detailed update will be provided to this Committee when the review reaches an appropriate stage of maturity.

Recommendation(s)

Members are asked to note the status update in relation to the Internal Audit Review of Operational Property Management.

Main Report

Background

1. Concerns were raised following a number of successive property incidents at a single City of London operational property site as to the adequacy of arrangements in place for property management; specifically, that there is a lack of clarity in relation to both officer and Committee roles and responsibilities.
2. Audit and Risk Management Committee requested that Internal Audit undertake a review of Operational Property Management. The overall objective of the Audit is to assess the adequacy of arrangements in place for effective management of operational property, in particular; the identification, prioritisation and execution of planned/routine maintenance work, reactive maintenance work and longer term improvement/upgrade works, and the effectiveness of wider governance arrangements in relation to operational property management.

Current Position

3. While there is some work still to complete, the Internal Audit review has reached a key milestone with some strategic choices which will determine how this piece of work continues to its full conclusion.
4. An interim report has been prepared and shared with the Town Clerk and Chief Executive and the City Surveyor as a working draft. This Committee will be provided with a fuller update once our work is concluded.

Corporate & Strategic Implications

5. The work of Internal Audit is designed to provide assurance as to the adequacy of the City of London Corporation's systems of internal control and governance.

Conclusion

6. Members are asked to note the status update in relation to the Internal Audit review of Operational Property Management.

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Committee(s)	Dated:
Audit and Risk Management Committee	13/1/2021
Subject: Corporate Risk Management Strategy	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	N/A
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: The Chamberlain	For Information
Report author: Paul Dudley	

Summary

This report provides Committee with an update on the corporate and the top red departmental risk registers as well as information on the Covid-19 Thematic Group risks. Both the corporate and red departmental registers have been reviewed by the Chief Officer Risk Management Group (CORMG) on 17 November 2020. The Covid 19 Recovery Group are responsible for reviewing the Thematic Group risk registers.

A total of 395 risks (397 in October 2020) have been identified by departments providing a wide range of risks that may affect service delivery. This total does not include the 42 (42 in October) Covid-19 Thematic Group risks, six of which are red risks (eight in October 2020).

There are currently 18 (18 in October 2020) corporate risks included on the corporate risk register of which there are eight red and ten amber risks.

In relation to the CR26 Brexit risk, a new EU Transition group has been established under the chairmanship of the City Surveyor with senior officers attending from across the City Corporation. The Group meets weekly. In the light of the current status of negotiations between the UK and the EU the current risk score has been elevated to a red 16.

With effect from 16 December 2020, the government has announced that London, most of Essex and parts of Hertfordshire will move into England's highest tier (Tier Three) of Covid restrictions and from 19 December much of the South East of England will be in Tier Three as well. It appears that a new variant of virus has been identified and this may be associated with the faster spread in southern England.

The corporate risk CR34 Covid-19, which has a current risk score of red 24 (second highest rating) is reviewed on regularly by the Gold Recovery Group (most recently on 22 December 2020). The Recovery Group has considered the potential impacts, of the move of London and much of the South East into Tier 4, on City Corporation services and have decided to maintain the current risk score of red 24. Should this change the Committee will be informed accordingly.

There are 24 (29 in October 2020) red departmental risks. Following discussions with relevant risk owners requesting a reassessment of their red departmental risks the number of these risks has reduced now to 24 from a high of 31 in June 2020. The fall is also in part due to a small number of Covid 19 red risks being reduced in risk score following progress in service mitigations.

The new Target Operating Model has implications for the content of the Corporate Risk Management Strategy. With the agreement of the Chairman, the Corporate Risk Management Strategy has been rescheduled for Committee endorsement for the May 2021 committee meeting.

There will be an internal audit review of risk management included in the Internal Audit Plan 2021/22. This review will include an assessment of the City Corporation's risk maturity. The current view of the City Corporation's risk maturity is at level four (out of five – five being the top risk maturity rating) on the ALARM/CIPFA risk maturity model.

Recommendation(s)

Members are asked to note the:

1. Risk report including changes to both corporate and top red departmental risk registers since October 2020.
2. Covid -19 Thematic Group summary risk register.
3. That the Corporate Risk Management Strategy will be represented for endorsement at the May 2021 Committee meeting.




































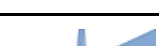






Main Report













Background

1. The corporate risk and top red departmental risk registers have been reviewed by the Chamberlain and the Chief Officer Risk Management Group (17 November 2020).
2. A total of 395 (397 in October 2020) wide ranging risks have been identified by departments – 51 red, 226 amber and 118 green risks at all levels.
3. Of the 395 total risks, there are 18 corporate, and 23 red departmental level risks. There are another 104 amber and 34 green risks recorded at departmental level. The remaining 215 are recorded as service level risks.
4. Held separately from the departmental risk registers are another 42 Covid-19 Thematic Group risks maintained on the Pentana Risk system (see paras 19-20). These registers are reviewed by the Covid19 Recovery Group on a regular basis.

Current Position

5. There are currently 18 corporate risks (eight red and ten amber). Of the eight red risks there are five risks which are scored at red 24. Three risks have increased in risk score whilst two risk have decreased in current risk score. All other corporate risks remain with the same current risk scores as reported in October 2020.
6. At the Committee meeting on 28 January 2020, it was agreed that at the first meeting after the end of each municipal year, the Committee would receive a detailed risk register of all corporate risks and at three other meetings during the year only, risks above appetite would be shown in detailed form plus a summary report provided. Attached, for this meeting as appendix 1, is the detailed corporate risk register showing risks above appetite as well as a summary risk report showing all corporate risks, attached as appendix 2.
7. Members are asked to note that the corporate risks CR28 Action Fraud and CR34 Covid-19 (detailed reports) are presented in the Not for Publication part of the agenda (appendix 3).
8. Table 1 below – List of current corporate risks as of 14th December 2020 (ordered by risk score) and highlighting the risk assessment flight path.

Risk reference	Title	Current Risk Score	Current risk score icon	Trend (difference in current and previous risk score)	Risk flight path (since risk creation date)
CR34	COVID-19	24			
CR35	Unsustainable Medium-Term Finances	24			
CR20	Road Safety	24			
CR28	Action Fraud	24			
CR32	Wanstead Park Reservoirs (formerly OSD 013)	24			
CR23	Police Funding	16			
CR24	Operational Security	16			
CR26	Brexit - Organisational Impact	16			
CR01	Resilience Risk	12			
CR02	Loss of Business Support for the City	12			
CR09	Health Safety and Wellbeing Risk (Management System)	12			
CR10	Adverse Political Developments	12			
CR16	Information Security (formerly CHB IT 030)	12			
CR21	Air Quality	12			

Risk reference	Title	Current Risk Score	Current risk score icon	Trend (difference in current and previous risk score)	Risk flight path (since risk creation date)
CR29	Information Management	12			
CR30	Climate Action	12			
CR33	Major Capital Schemes	12			
CR17	Safeguarding	8			

Corporate Risks increased in current risk score: CR26 Brexit Risk and CR10 Adverse Political Developments

9. There are three risks which have increased in risk score since the October 2020 report. Both CR26 Brexit risk (amber 8 to red 12) and CR10 Adverse Political Developments (amber 8 to amber 12). Both current risk ratings for these risks have been influenced by the current status of the negotiations between the UK and EU on the proposed trade agreement.

CR30 Climate Action

10. CR30 Climate Action has increased from a green (4) to an amber (12) following the approval of the Climate Action Strategy by the Court of Common Council in October 2020 and the commencement of the delivery of the strategy from April 2021.
11. The reason for the increase in current risk score for CR30 Climate Action is that prior to the Climate Action strategy being approved, the risk was focused on phase 1: 'Develop strategy and action plan'. Now that that phase has been successfully completed, the City Corporation has moved to in phase 2: 'Deliver and refine action plan'.
12. This second phase has a higher risk score as until the individual action plans within the overall programme have been fully worked up, there is a level of uncertainty. Indeed, the risk score is expected to fluctuate as each year long period of the six-year work programme is approached and funding mechanisms and detailed action plans are confirmed. The City Corporation is currently in the process of mobilising (working with departments on detailed plans and how to deliver them) for the first year. Implementation commences on 1 April 2021.

Corporate Risk decreased in current risk score:

CR33 Major Capital Schemes and CR 24 Operational Security

13. CR33 Major Capital schemes has been decreased in risk score from a red 16 to an amber 8 given that progress had been made to ensure that there is sufficient capacity and capability to continue to move these projects through to delivery as well as the implementation of a robust and working governance structure.

14. CR24 Operational Security- With mitigations in place and reduced footfall, red 16 is appropriate score. There is detailed risk mitigation covering temporary measures across our highways and audit, reviews, training and policy consistency taking place across our estate. Cross cutting work is nearly complete.

Updates on CR26 Brexit and CR34 Covid-19 Risks:

CR26 Brexit

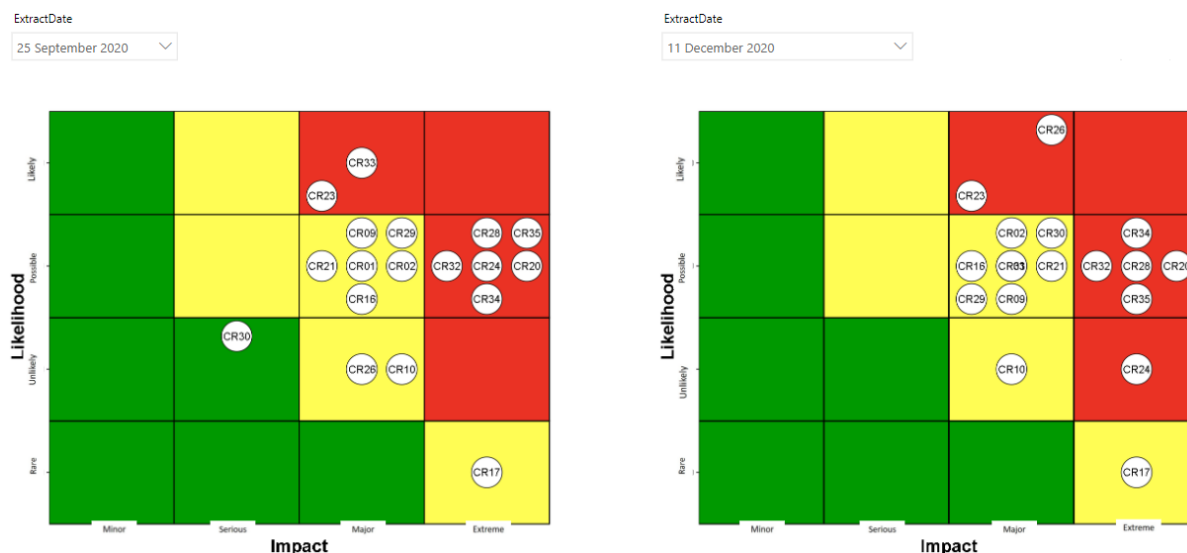
15. This risk relates to City Corporation services failing to prepare appropriately for the UK departure from the EU. Potential impacts include services being disrupted as supply chains and contracts are reassessed, potentially increasing cost and reprioritisation of resources; uncertainty over multi-year grants may undermine the City Corporation's ability to deliver or commit to services; and the City Corporation may be unable to access the specialist talent and supply chains it needs to deliver some of its services.
16. A strategy was prepared by the Brexit lead officer outlining the key short, medium and long-term considerations in preparing for Brexit. A new EU Transition Group, meeting weekly and under the Chairmanship of the City Surveyor, reviews the risks and mitigations within the Brexit risk register.
17. The CR26 Brexit risk current risk score has been increased from amber 8 to a red 16 following an assessment the potential for a no deal with the EU and the additional arrangements that are now being put in place in Port Health and HARC to manage the additional work loads. At the time of producing this report (15 December 2020) both the EU and UK continue to negotiate the trade agreement prior to the end of the Transition Period on 31 December 2020.
18. The City Corporation continues to engage with stakeholders at central, regional and local level, including providing information, when requested, to MHCLG via London Councils and the attendance of the Town Clerk & Chief Executive at meetings on Brexit preparedness with the GLA, London Councils and other stakeholders.

CR34 Covid 19

19. With effect from 20 December 2020 London and parts of the South East of England moved into a new Tier Four following the increased transmissibility of a new strain of Covid 19.
20. The corporate risk CR34 Covid-19, which has a current risk score of red 24 (second highest rating) is regularly reviewed by the Gold Recovery Group (last reviewed on 22 December). The Recovery Group has considered the potential impacts, of the move of London into Tier 4, on City Corporation services and have decided to maintain the current risk score of red 24 although the risk continued to be reviewed. Should the current risk score change the Committee will be informed accordingly.

Disposition of corporate risks on the risk matrix

21. Table 3 below shows the disposition of corporate risks on the risk matrix between 25 September 2020 to 11 December 2020



Red Departmental level risks

22. There are 24 departmental red risks (29 in October 2020). The Committee were previously advised of significant increase in departmental red risks (31 in June 2020), partly due to Covid 19 risk assessments. Discussions have taken place with departmental red risk owners to discuss these assessments and this has led, where appropriate, to some of these risks have being re-rated as amber risks. A list of the current departmental red risk is attached as appendix 4

Covid19 Thematic Group Risks

23. In addition to the CR34 Covid-19 corporate risk there are 42 (42 in October 2020) Thematic Group risks which include six red risks, thirty amber and six green risks. Attached as appendix 5 is a short summary report of all 42 Covid-19 Thematic group risks included in the not for publication part of the agenda.

24. The CR34 Covid 19 risk is reviewed regularly by the Gold Recovery Group and recently received a change in current risk score (September 2020 from a red 16 to a red 24). The latest assessment has not changed the current risk score (see para 19-25). The departmental level Covid19 risks are reviewed/monitored by the relevant thematic groups. Gold is sent a weekly update on all Covid 19 risks.

Corporate Risk Management strategy

25. The Corporate Risk Management Strategy was due to be presented to the Committee, for endorsement, at this meeting. The announcement of the City Corporation's Target Operating Model in November and its subsequent approval by the Court of Common Council in December 2020 impacts on the contents of

the strategy, particularly in relation to roles and responsibilities and potentially the risk policy statement. With the agreement of the Chairman, it has been agreed to resubmit, for endorsement, the revised Policy for the May 2021 meeting.

Internal Audit Review of Risk Management

26. There will be an internal audit review of risk management in the Internal Audit Plan 2021/22. This review will include an assessment of the City Corporation's risk maturity (a measure of current risk maturity against a recognised maturity framework).
27. The current view of the City Corporation's risk maturity is at level four (out of five – five being the top risk maturity rating) using the ALARM/CIPFA risk maturity model. This assessment is based upon the 2016 health check report produced by Gallagher Basset International Ltd (and reported to the November 2016 Audit and Risk Management Committee) and considering the improvements to the City Corporation's Risk Management framework since that time.
28. Central Government are currently developing a risk maturity model for use in the Civil Service. Based upon the limited information currently available on this risk maturity model, the City Corporation has many of the elements of level 4 (out of five – five being the top-rated level of risk maturity). This maturity model is likely to be available in the first half of 2021.
29. The outcome of the internal audit review and the assessment of risk maturity will be reported to the Committee in 2021/22.

Conclusion

30. The corporate and red departmental risk registers were reviewed by the Chamberlain and the Chief Officer Risk Management Group. The Covid19 Recovery Group regularly review the Thematic Group risk registers. This provides additional assurance to Chief Officers and the Audit and Risk Management Committee that corporate and top red departmental risks (as well as the Covid19 Thematic Group red risks) are being appropriately and being actively managed during this emergency. The Corporate Risk Management Strategy will be re-presented in May 2021 for endorsement. The internal audit of risk management will be reported in 2021/22.

Corporate & Strategic Implications

31. The reporting of risk information is in accordance with the Corporate Risk Management Strategy (2020)

Appendices

- Appendix 1 - Corporate risk and actions detailed report – Risks above appetite only
- Appendix 2 - Corporate risk summary report (All risks)

- Appendix 3 - CR28 Action Fraud and CR34 Covid-19 risks (Included in the **Not for Publication** section of the agenda)
- Appendix 4 – Red departmental level risk register – summary report (by department)
- Appendix 5 – Covid19 Thematic group Summary risks by department (Included in the **Not for publication** part of the agenda)

Paul Dudley

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Corporate Risk Detailed Register EXCLUDING completed actions by risk appetite – Risk above appetite only

Report Author: Paul Dudley

Generated on: 15 December 2020



Rows are sorted by Risk Score

Code & Title: CR Corporate Risk Register 9

Risk Appetite Level Description Risk above appetite

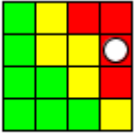
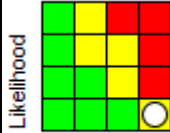
Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR20 Road Safety 23-Oct-2015	<p>Cause: Limited space on the City's medieval street network 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 	<p>Likelihood</p> <p>Impact</p>	24	<p>The risk assessment is unchanged, reflecting the probability that a fatality is fairly likely to occur while mitigation measures are being implemented. Delivery of range of on-street measures to enable the safe return of the City's workforce and support COVID-19 recovery will be substantively completed by the end of November 2020. Continuing to work with City of London Police on road danger reduction engagement and enforcement, including targeted action to tackle people cycling on pavements.</p> <p>24 Nov 2020</p>	<p>Likelihood</p> <p>Impact</p>	16	31-Mar-2022	<p>Constant</p>

APPENDIX 1

Carolyn Dwyer	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 loss of credibility and/or authority						
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Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR201 Road danger reduction and Vision Zero	A programme of projects to reduce road danger on the City's streets including: • Bank on Safety and All Change at Bank • RDR engineering programme • 15mph traffic limit • Ludgate Circus (lead by TfL)	The All Change at Bank, which will further improve safety at Bank junction, received Gateway 4 approval in October 2020. The project remains on programme to be completed in late October 2022, coinciding with the completion of the Bank Station upgrade. Delivery of range of on-street measures to enable the safe return of the City's workforce and support COVID-19 recovery will be substantively completed by the end of November 2020.	Ian Hughes	24-Nov-2020	31-Mar-2022
CR202m Road danger Reduction Campaigns and engagement	Campaigns and engagement activities to encourage safe behaviours and promote safe vehicles, including: • Active City Network • User and stakeholder liaison • Schools programme	Ongoing delivery of cycle training and maintenance, including recent events in partnership with St Bartholomew's Hospital and Robert McAlpine. Continuing to work with City of London Police on road danger reduction engagement and enforcement, including targeted action to tackle people cycling on pavements and a campaign to remind people cycling of the need to carry and use lights.	Ian Hughes	24-Nov-2020	31-Mar-2022

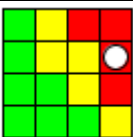
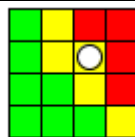

APPENDIX 1

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
CR32 Wanstead Park Reservoirs (formerly OSD 013) 09-Dec-2019 Colin Buttery	<p><i>(Cause)</i> Gradual deterioration of the fabric of the reservoirs and / or excessive rain.</p> <p><i>(Event)</i> Risk that the reservoirs may overtop and be washed away, leading to a cascading breach.</p> <p><i>(Impact):</i></p> <ul style="list-style-type: none"> • Potential for loss of life or injury to staff/residents. • Low level flooding of the park and surrounding residential/commercial areas • Park closed for several weeks • Civil claims/financial loss claims made from residents/businesses • Adverse effect on the reputation of the City corporation (Local/national media interest) • Legal action by the Environment Agency • Requirement for significant immediate CoLC funds to repair damage • Damage to a listed landscape. 	 <p>Likelihood</p> <p>Impact</p>	24	<p>Approved by OSCG Committee December 2020.</p> <p>The Engineering Study proposes improvements to level crests; reinforce dam faces and direct water flow. The Study is being proposed for Capital Funding to the Projects Board and subsequent Committees with a recommendation for a further study on the interaction of Ornamental Water with the River Roding.</p> <p>07 Dec 2020</p>	 <p>Likelihood</p> <p>Impact</p>	8	30-Jun-2024	Constant

Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
OSD 013 b Project Board	Create and lead a project board.	Project board established, meeting regularly. Some meetings have been postponed due to COVID-related work delays. Next meeting January. Ongoing action.	Colin Buttery	07-Dec-2020	01-Mar-2021
OSD 013 c Evaluate and analyse the report.	Evaluate and analyse the report from the reservoir engineer.	Report findings accepted and are being proposed for Capital Funding.	Paul Monaghan	07-Dec-2020	01-Jan-2021

APPENDIX 1

OSD 013 d Environment Agency Actions	Confirm to EA that measures in the interest of safety have been completed.	Recommended works and further study being proposed.	Paul Monaghan	07-Dec-2020	31-Mar-2021
OSD 013 f Gateway 3 Report	Gateway 3 report requesting funding to consider the options.	Project plan currently on track. To be review at next board meeting in January.	Paul Monaghan	07-Dec-2020	31-Jan-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
CR35 Unsustainable Medium Term Finances Page 38	Causes: Anticipated decline in public sector funding (local government and Police), increasing demands (revenue and capital) and an ambitious programme of major project delivery threaten our ability to continue to deliver a vibrant and thriving Square Mile Normal course of business unable to function due to COVID 19 restrictions BREXIT compounding market uncertainty and exacerbating the economic downturn. Major contraction in key income streams and increase in bad debts. In particular that lower occupancy levels in city properties reduce investment property income over the medium term. Police Transform programme fails to realise the budget mitigations anticipated Reduction in the value of investments- property and securities- reduces available capital for major project financing. Event: Inability to contain financial pressures within year (2020/21) and compensatory savings and/or income generation to meet the Corporation's forecast medium term financial deficit will not be realised. Effects: Additional savings over and above those identified through the Fundamental Review to meet this challenge are required and/or closure in some areas reserves are utilised and/or services stopped. The City Corporation's reputation is damaged due to	 Likelihood	24	Current annual estimated impact is an overspend of £35.9.4M at the end of period 7 across the three funds; £16.8m of which is City Fund. Driven mainly by income loss in the following areas: Barbican, GSMD, Tower Bridge, Animal Reception Centre and Events. Mitigations include spend reduction, furloughing of casual staff and permanent staff not able to work and recovery of lost CF income from the governments compensation scheme anticipated to be £13.6m. Property income: In the short term, the City is protected by tenancy arrangements, but that the medium term is more concerning. The make-up of current portfolio is underrated for retail which offers some protection. Cash flow position is holding up well. Balance Sheet- it is too early to assess any permanent re-valuation. Securities portfolio- after an initial drop has largely recovered the Dec 2019	 Likelihood	12	31-Mar-2021	

APPENDIX 1

19-Jun-2020 Caroline Al-Beyerty	failure to meet financial objectives or the need to reduce services / service levels to business and community. Being unable to set a balanced budget which is a statutory requirement for City Fund. Spend is not aligned to Corporate Plan outcomes resulting in suboptimal use of resources and/or poor performance. Capital projects stalled due to COVID restrictions. Stakeholders experiencing reduced services and service closures.			valuation. 07 Dec 2020				Constant
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Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR 35a Reduction income Page 39	A reduction in key income streams and increase in bad debt	This is being monitored monthly, with action being taken to reduce spend where possible. At end of Month 7 income losses predicted at £35.9.4M Key Impact areas: <ul style="list-style-type: none"> • Property investment income – Currently estimating £14.2m adverse variance across all 3 funds at the end of the September. This will be reviewed again in January when impacts from 3rd quarter billing will be available. • Resetting of in-year local risk budgets totalling some £15.2m has been agreed by Finance Committee and is subject to Court approval on 3rd December. 	Sonia Virdee	07-Dec-2020	31-Mar-2021
CR 35b Cash flow	To reduce strain on cash flow.	<ul style="list-style-type: none"> • The Corporation remains very liquid and the outlook for near term cash flows is robust. • Review major commitments, including options for re-profiling. 	James Graham; Sonia Virdee	07-Dec-2020	31-Mar-2021
CR 35c Covid-19 Expenditure	Increased expenditure related to COVID measures- maximise recovery from government	In the short-term, high % of additional expenditure recoverable from government, and recruitment controls putting downward pressure on budgets. Possible mitigations: <ul style="list-style-type: none"> • Maximising recovery from government- spend is being coded and monitored. Estimated claim of up to £12.6m for loss of fees & charges on City Fund. Claim submitted for 1st quarter of £1.5m • Furloughing workers where appropriate has been done recovering £2.2m to end of August • Maintaining tight financial disciplines. 	Sonia Virdee	07-Dec-2020	31-Mar-2021
CR 35d Business rates	Inability of occupiers to pay rates as their income falls an business models are damaged.	<ul style="list-style-type: none"> • Monthly monitoring in place. The impact of COVID-19 has been to lower the collection rate 	Phil Black; Neilesh	07-Dec-2020	31-Mar-2021

APPENDIX 1

	A reduction in demand for office space in the square mile, leading to lower occupation and business rate income. The Corporation is currently benefitting from growth in business rates retained income of c£40m. Non-payment of rates across London leading to difficulties in meeting cash flow payments as host of the pool.	for business rates. Collection to the end of October is 6.0% below the previous year. <ul style="list-style-type: none"> • Should business rate income fall by more than 20%, the safety net would be reached. • Modelled scenarios have been included in the revised MTFP- high level of income volatility. • The Govt has recognised the cashflow impacts of business rates and has deferred its share for April-June, which has been re-profiled over the remainder of the year. The Govt is also allowing authorities to spread the impact of business rate deficits over 3 years. 	Kakad		
CR 35e Investments	Impact on investments: securities/property	<ul style="list-style-type: none"> • The values of the three main financial investment portfolios have continued to grow steadily, participating in a broad-based rally across financial markets over the summer. • COL's Pension Fund contributions are fixed until 2023, providing some protection, whilst the diversified asset allocation strategies and use of active management across all three funds should continue to deliver some stability if general market moves become extreme again. • Actions on deferral and rent free is aimed at retaining tenants. If tenants default - there is a high risk of long lead in periods (of up to 24 months) to find new tenants. Some tenants are in administration since 19th June 2020. 	Nicholas Gill; James Graham	07-Dec-2020	31-Mar-2021
CR 35f MTFP	Impact on the MTFP	<ul style="list-style-type: none"> • FR proposals affecting staff put into abeyance during CoLC's response to Covid-19. • CHB currently reviewing achievability of savings built into the MTFP 	Caroline Al-Beyerty; Alistair Cook	07-Dec-2020	31-Mar-2021
CR 35h Fundamental Review Implementation	To implement the Fundamental Review project plan- TOM	<ul style="list-style-type: none"> • FR proposals affecting staff put into abeyance during CoLC's response to Covid-19. • The Flexible Retirement Scheme for those aged 60+ is currently being implemented and a review is currently being undertaken to assess the feasibility of extending the scheme to those aged 55-59. • Other savings relating to organisation design and an associated reduction in headcount are expected to begin from the new financial year. 	Chrissie Morgan	07-Dec-2020	31-Mar-2021

Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR23g Sustainable Settlement	Implement sustainable medium-term financial settlement for CoLP: - Revenue position	Work in progress to ensure balanced budget is set for 21/22 and determine extent of savings targets through Senior Member bilateral process, then RASC. Once settled, savings plans for future years need to be identified. Loan based capital financing model implemented for 20/21.	Alistair Cook	21-Dec-2020	31-Dec-2021

APPENDIX 1

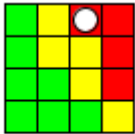
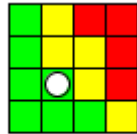

2020/21 onwards	Capital financing				
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Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date	Current Risk score change indicator
CR24 Operational Security <div> <div>Page 42</div> <div>23 Jun-2017</div> <div>John Barradell</div> </div>	Cause: Inadequate, poorly maintained or time expired security infrastructure; lack of security culture within the organisation; poor training or organisation of staff; insufficient staff. Event: Security of an operational property is breached. 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	<div> <div>Likelihood</div> <div>Impact</div> </div>	16	In early 2021, Town Clerks, DBE and City Surveyors will be reviewing splitting this into two risks, one covering Publicly accessible Property and second Publicly accessible areas in our public domain and highways. With mitigations in place and reduced footfall, 16 is appropriate score. There is detailed risk mitigation covering temporary measures across our highways and audit, reviews, training and policy consistency taking place across our estate. Cross cutting work is nearly complete. 09 Dec 2020	<div> <div>Likelihood</div> <div>Impact</div> </div>	16	01-Oct-2020	<div> <div>Constant</div> <div> <div></div> </div> </div>

Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR24b Mitigating risk of vehicle borne attacks	Mitigating risk of vehicle borne attacks across Corporation estate.	<p>Internal HVM Blockers at CR24B</p> <p>Location 3,works underway with both blockers installed and commissioning to complete in December</p> <p>Location 4,Delivery delayed due Riney's submitting their order late and then manufacturing issues caused by the Covid 19 working practices. The resources have been reduced further at the factory during the second lockdown in order to maintain a safe working practice which has slowed the manufacturing process accordingly. The install works will follow location 3 (as the same install team are used).</p>	Carolyn Dwyer; Paul Wilkinson	09-Dec-2020	31-Jan-2021

APPENDIX 1

CR24e HVM for major events	Protecting CR24 location A for major events by installing HVM.	CR24 A location 7 expected to commence works in February 2020, this was delayed due to COVID and bespoke design - design expected complete January 2021	Carolyn Dwyer; Richard Woolford	09-Dec-2020	31-Dec-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
CR26 Brexit - Organisational Impact Page 43	<p>Cause – The outcome of Brexit negotiations does not secure continuity of contracts, access to talent, ongoing grant funding and/or security of supply chains</p> <p>Event – The City Corporation services fail to prepare appropriately for the UK departure from the EU on 31 December 2020 (following the commencement of the transition phase on 31 January 2020).</p> <p>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. There could also be delays in the food supply chain at the ports as well as knock on effect at the London food markets. There may be longer term effects on local communities and the attractiveness of London for workers, businesses and visitors.</p>	<p>Likelihood</p>  <p>Impact</p>	16	<ul style="list-style-type: none"> The City Corporation's Brexit risks are being reviewed on a fortnightly basis by risk owners, following recent government announcements on negotiations. The risk score has been increased from amber 8 to a red 16 following an assessment the potential for a no deal with the EU and the additional arrangements that are now being put in place in Port Health and HARC to manage the additional work loads . Contingency plans have been agreed that in the event of a 'no deal' scenario, current Covid Gold arrangements will incorporate the City Corporation's Brexit response work; to this end, Brexit is no a regular agenda item at those Gold meetings. The City Corporation continues to provide information as part regular data submissions to MHCLG via London Councils. Town Clerk attending regular meetings with the GLA, LLAG and London Councils on Brexit Preparedness. Simon Latham has been nominated as the Corporation's point of contact for MHCLG and London Councils 	<p>Likelihood</p>  <p>Impact</p>	4	31-Dec-2020	

<p>Page 44</p> <p>11-Oct-2018 John Barradell</p>				<p>briefings and work on this.</p> <ul style="list-style-type: none"> • Engaging with political stakeholders at a central, regional and local level, including MPs, remains vital. The City Corporation must ensure that it is coordinated in its approaches to political stakeholders, with key departments and teams maintaining oversight – namely the Remembrancer's, Communications Teams (including Corporate Affairs) and the Town Clerk and Chief Executive's Office. • An EU transition Group, chaired by the City Surveyor, has been established to meet weekly to review (and where appropriate improve) the City Corporations preparations for the end of the Transition period and into the New Year. The possibility of a number of significant events occurring at a similar time has been recognised – a worsening Covid 19 position, a severe weather, terrorist incident and a no deal Brexit situation in CR01 Resilience risk, CR34 Covid 19 corporate risks . • The management one or more of these events will be managed through Covid 19 Gold and the usual emergency planning arrangements for the City Corporation. <p>11 Dec 2020</p>				Constant
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Action no,	Action description	Latest Note	Action	Latest Note	Due Date
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APPENDIX 1

Title,			owner	Date	
CR26b Summit Group	Progress on all departmental Brexit risks and their mitigations be reported regularly to Summit Group	<ul style="list-style-type: none"> • Town Clerk attending regular meetings with the GLA, LLAG and London Councils on Brexit Preparedness. • The City Corporation's Brexit risks are being reviewed on a weekly basis taken by the EU Transition Group. Given the increasingly likelihood of an no deal with the EU (although one is still possible) it is anticipated that a number of additions to the register and changes to scores will be agreed. • Contingency plans have been agreed that in the event of a 'no deal' scenario, current Covid Gold arrangements will incorporate the City Corporation's Brexit response work; to this end, Brexit is a regular agenda item at those Gold meetings. 	Simon Latham	11-Dec-2020	31-Dec-2020
CR26c Engagement with third parties	Effective corporate coordination of communications with political and government stakeholders at a central, regional and local level is vital, to ensure that the organisation speaks with one voice and to agreed lines.	The necessity to continue engaging with political and government stakeholders at a central, regional and local level, including MPs, remains vital. The City Corporation must ensure that it is coordinated in its approaches to political and government stakeholders, with key departments and teams maintaining oversight – namely the Remembrancer's, Communications Teams (including Corporate Affairs) and the Town Clerk and Chief Executive's Office.	John Barradell; Paul Double; Simon Latham; Bob Roberts	11-Dec-2020	31-Dec-2020

APPENDIX 1

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	Cause - Lack of appropriate planning, leadership and coordination Event - Emergency situation related to terrorism or other serious event/major incident is not managed effectively 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.	 Likelihood Impact	12	<ul style="list-style-type: none"> Business Continuity training complete. Action plan 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 - Current work postponed due to response to Covid 19 09 Dec 2020	 Likelihood Impact	12	31-Jan-2021	 Constant

Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR01L Business Continuity Management	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 Work has started with Clearview a company providing software to assist Col depts identify and document the BIA process linked to the action plan , however work is postponed Update - conversations with Clearview and Colp have taken place to look at potential for a joint procurement of the Clearview system , Ongoing	Gary Locker	09-Dec-2020	31-Jan-2021
CR01M Review of LALO Local authority liaison officer	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 LALO were involved in a City based partnership exercise February 2020, further exposure to training and exercise is intended but postponed due to response to COVID 19 Update -LALO training under London wide review	Gary Locker	09-Dec-2020	31-Jan-2021
CR01N Standardisation	to increase City capability and resilience in also supporting wider London boroughs during major incident response,	BECC training as part of this process completed March 2019 , cycle of training to continue	Gary Locker	09-Dec-2020	31-Jan-2021

APPENDIX 1




procedures	Local Emergency Control Centres, Emergency centres as part of a wider humanitarian	Further staff awareness date planned 25/6/19 as part of cycle of training/awareness Pan London Standardisation process postponed due to Covid 19 response Update – As we move to some business as usual despite still responding to Covid 19 the Col core of support for BECC and other response roles have not changed , training to increase capability for Col response remains ongoing for 2021 - currently joint working with Colp to identify new City based survivor reception centres /update virtual training/refresher session of Col crisis support team took place 2/12/20			
CR01Q Rolling DR tests	Plan an annual calendar of IT DR tests, covering critical systems and services	Rolling DR Tests have commenced and are now an ongoing BAU activity. Almost all servers and services have now moved to the public cloud (Microsoft Azure), improving their stability and resilience. Agilisys are ceasing their datacentre contract in Feb/March 2021, so works are ongoing to migrate the remaining services, including telephony, to other cloud or hosting services. Target for completion is Feb 2021. Once this has completed, IT will carry out a series of DR/resilience tests against the new environment.	Matt Gosden	09-Dec-2020	31-Mar-2021
CR01R Site Insurance audit recommendation	All COL and COLP comms and data rooms are being audited with a view to: <ul style="list-style-type: none"> Assessing power and security provision Update the Comms Room Policy and MoU with City Surveyors, including categorisation of rooms into critical and non-critical. Provide recommendations for a project to improve the power/UPS resiliency in these rooms.	The migration of services away from on-premise comms rooms, and Agilisys datacentres has significantly reduced the likelihood of a significant power related outage.	Matt Gosden; Kevin Mulcahy	09-Dec-2020	31-Mar-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
CR21 Air Quality 07-Oct-2015 Ruth Calderwood	<p>Cause: Levels of air pollution in the City, specifically nitrogen dioxide and fine particles, impact on the health of residents, workers and visitors. The City Corporation has a statutory duty to take action to improve local air quality.</p> <p>Event: The City of London Corporation is insufficiently proactive and resourced, and does not have the right level of competent staff, to be able to fulfil statutory obligations, as a minimum, in order to lower levels of air pollution and reduce the impact of existing air pollution on the health of residents, workers and visitors.</p> <p>Effect: The City Corporation does not fulfil statutory obligations and air pollution remains a problem, impacting on health. Potential for legal action against the Corporation for failure to deliver obligations and protect health. Adverse effect on ability to deliver outcomes 2 and 11 of the Corporate Plan</p>	<p>Likelihood</p> <p>Impact</p>	12	<p>Air pollution has reduced substantially during 2020 which is largely due to the decline in activity associated with the response to the COVID 19 pandemic. This is likely to be temporary, so no change has been made to the risk rating at this stage.</p> <p>During 2021, close attention will be paid to the air quality risk. It is likely to evolve due to: a recent Coroner's ruling that air pollution was a contributory factor in the death of a London child; forthcoming change in statutory obligations and ongoing research into the health effects of air pollution, which includes the changes to World Health Organisation Air Quality Guidelines</p> <p>18 Dec 2020</p>	<p>Likelihood</p> <p>Impact</p>	6	31-Dec-2020	<p>Constant</p>

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR21 001h	Develop baseline model for compliance assessment and publish annual report of air quality data	Baseline model for compliance assessment has been developed. Area of the Square Mile that met the nitrogen dioxide targets in 2019 was 67%, up from 30% in 2018	Ruth Calderwood	15-Dec-2020	31-Dec-2025
CR21 001i	100% of vehicles owned or leased by the CoL are electric or hybrid by 2025	There are 7 electric cars, 4 electric vans and 1 electric minibus in the Corporate Fleet	Ruth Calderwood	07-Dec-2020	31-Dec-2025

APPENDIX 1

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CR21 001j	Develop and support an Emission Reduction Private Members Bill for London local authorities	The contents of the Emission Reduction (Local Authorities in London) Bill will be used to influence the Environment Bill as it passes through the House of Lords, early 2021. A submission was made to the Public Bill scrutiny committee for the Environment Bill	Ruth Calderwood	15-Dec-2020	31-Dec-2021
CR211	Assess percentage compliance rate with NO2 target	67% compliance in 2019	Ruth Calderwood	07-Dec-2020	31-Dec-2024

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
CR17 Safeguarding Page 49	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)	 Impact	8	A report on the updated Corporate Safeguarding Policy was presented to the February meeting of the Safeguarding Sub-committee. The network of Safeguarding Champions to fully embed safeguarding responsibilities across the organisation has been relaunched. Some of the existing champions have moved on or no longer perform this role. Chief Officers have been asked to nominate a Safeguarding Champion for their departments, and to report to the Director of Community and Children's Services every six months on the discharge of their safeguarding responsibilities. These actions have been delayed due to demands relating to the Covid-19 response This network of Champions is still outstanding due to C19 and will remain on register with a revised target date of March 2021. Monitoring of the demand for Adult and Children Social Care is taking	 Impact	8	31-Mar-2021	

APPENDIX 1

22-Sep-2014 Andrew Carter				place to ensure resources are adequate to manage the response to Covid-19. Investigations into ensuring business continuity arrangements and Mosaic (Adult and Children Information system) reliability issues have been launched in the light of the Hackney Council cyber-attack. 08 Dec 2020				Constant
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Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR17X Safeguarding Champions and Departmental Updates	Chief Officers have been asked to nominate Safeguarding Champions and to report to the Director of Community and Children's Services every six months on the discharge of their safeguarding responsibilities.	The network of Safeguarding Champions to fully embed safeguarding responsibilities across the organisation has been relaunched. Some of the existing champions have moved on or no longer perform this role. Chief Officers have been asked to nominate a Safeguarding Champion for their departments. Chief Officers have also been asked to report to the Director of Community and Children's Services every six months on the discharge of their safeguarding responsibilities. These provisions have been delayed due to extra demands on departments relating to the Covid-19 response.	Andrew Carter	08-Dec-2020	31-Mar-2021
CR17y Possible increased demand on Children and Adult Social Care as a result of Covid-19	Monitoring is taking place to ensure that the Children and Adult Social Care Workforce is adequately resourced to tackle the increase in demand which is likely to occur when the Covid-19 lockdown period finishes.	If It is possible this will generate additional demands on the system as an increase in identified need happens at the same time and a surge on safeguarding and support services risks outstripping capacity. Additional capacity has been brought into the front line Children and Adult Social Care services to support demand however these arrangements are temporary and require a wider service review to ensure that there is sufficient capacity long term to meet demand due to Covid-19. HR have advised that no restructures can progress at this time due to the new Target Operating Model (TOM) and Fundamental Review starting.	Chris Pelham	08-Dec-2020	31-Mar-2021
CR17z Mosaic system continuity and reliability	Investigations into ensuring business continuity arrangements and Mosaic (Adult and Children Information system) reliability issues have been launched in the light of the Hackney Council cyber attack..	Arrangements for business continuity in respect of the Mosaic system are being reviewed to address any potential complete loss. This is unlikely due to the system being externally hosted but following the Hackney Council cyber-attack all current mitigation is being reviewed.	Chris Pelham	08-Dec-2020	31-Jan-2021

		Mosaic system reliability issues have been raised by users these are being investigated and we are working with the system provider to ensure all issues are being reported and monitored effectively. This will enable the analysis and identification of any underlying issues and assist the provider and our IT teams to implement appropriate remedial actions where necessary.			
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Corporate risk short summary report - by risk appetite

Report Type: Risks Report

Generated on: 15 December 2020










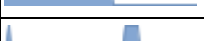
Rows are sorted by Risk Score

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
Risk Appetite Level Description Risk above appetite

Risk code	Risk title	Creation Date	Risk Category Description	Current Risk Score	Current Risk Score Indicator	Trend Icon	Risk flight patch (Since risk creation date)
CR20	Road Safety	23-Oct-2015	Health and Safety	24			
CR28	Action Fraud	13-Mar-2019	Partnership/Contractual	24			
CR32	Wanstead Park Reservoirs (formerly OSD 013)	09-Dec-2019	Health and Safety	24			
CR34	COVID-19	12-Mar-2020	Covid-19	24			
CR35	Unsustainable Medium-Term Finances	19-Jun-2020	Financial	24			
CR23	Police Funding	21-Nov-2016	Financial	16			
CR24	Operational Security	07-Jun-2017	Physical	16			
CR26	Brexit – Organisational Impact	11-Oct-2018	Brexit	16			


APPENDIX 2

Risk code	Risk title	Creation Date	Risk Category Description	Current Risk Score	Current Risk Score Indicator	Trend Icon	Risk flight patch (Since risk creation date)
CR01	Resilience Risk	20-Mar-2015	Physical	12			
CR21	Air Quality	07-Oct-2015	Environmental	12			
CR17	Safeguarding	22-Sep-2014	Safeguarding	8			

Risk Appetite Level Description Risk at appetite

Risk code	Risk title	Creation Date	Risk Category Description	Current Risk Score	Current Risk Score Indicator	Trend Icon	Risk flight patch (last 12 assessments)
CR02	Loss of Business Support for the City	22-Sep-2014	Economic	12			
CR09	Health Safety and Wellbeing Risk (Management System)	22-Sep-2014	Health and Safety	12			
CR16	Information Security (formerly CHB IT 030)	10-May-2019	Technological	12			
CR29	Information Management	08-Apr-2019	Technological	12			

Risk Appetite Level Description Risk below appetite

Risk code	Risk title	Creation Date	Risk Category Description	Current Risk Score	Current Risk Score Indicator	Trend Icon	Risk flight patch (last 12 assessments)
CR10	Adverse Political Developments	22-Sep-2014	Reputation	12			
CR30	Climate Action	07-Oct-2019	Environmental	12			
CR33	Major Capital Schemes	14-Feb-2020	Financial	12			



Top red risks only - short summary by department

Report Type: Risks Report

Report Author: Paul Dudley

Generated on: 15 December 2020

Rows are sorted by Risk Score



















Department Description Barbican Centre

Department Description: Barbican Centre 10

Page 55




Code	Title	Risk owner	Current Impact	Current Likelihood	Current Risk Score	Current score	Latest Note Date	Target Impact	Target Likelihood	Risk Score	Target score	Target Date	Flight Path
BBC Arts 004	Loss of Key Artists/Companies/Events	Leonora Thomson	8	2	16		08 Dec 2020	4	2	8		31-Mar-2021	
BBC Arts 008	Box Office Targets	Leonora Thomson	8	2	16		08 Dec 2020	4	2	8		31-Mar-2021	
BBC Buildgs 017	Risk of not being prepared for subsequent waves	Jonathon Poyner	8	2	16		07 Dec 2020	8	1	8		31-Mar-2021	
BBC Commerc 003	Impact of Brexit on the Movement of Talent, Technical and Production Staff and Temporary Movement of Cultural Goods	Nicholas Kenyon	4	4	16		11 Dec 2020	4	3	12		31-Dec-2021	

APPENDIX 4

Code	Title	Risk owner	Current Impact	Current Likelihood	Current Risk Score	Current score	Latest Note Date	Target Impact	Target Likelihood	Risk Score	Target score	Target Date	Flight Path
BBC Commerc 005	Pandemic Affecting Touring of Exhibitions	Sandeep Dwesar	4	4	16		09 Dec 2020	4	2	8		31-Dec-2020	
BBC Ex Halls 003	Exhibition Halls Compliance and Condition Risk Resulting from Bow-Wave	Jonathon Poyner	8	2	16		07 Dec 2020	4	2	8		31-Mar-2021	
BBC Finance 001	Financial Targets Not Achieved, Including Income and Expenditure Volatility	Sandeep Dwesar	4	4	16		11 Dec 2020	4	2	8		30-Apr-2021	
BBC Finance 003	Funding Cuts	Sandeep Dwesar	4	4	16		11 Dec 2020	4	3	12		30-Apr-2021	
BBC H&S 002	Failure to deal with Emergency /Major Incident or Risk of Terrorism	Jonathon Poyner	8	2	16		14 Dec 2020	8	1	8		31-Mar-2022	
BBC H&S 008	Fire Leading to Major Incident	Jonathon Poyner	8	2	16		09 Dec 2020	8	1	8		05-Mar-2022	

Department Description City of London School

Department Description: City of London School 1



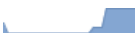
Code	Title	Risk owner	Current Impact	Current Likelihood	Current Risk Score	Current score	Latest Note Date	Target Impact	Target Likelihood	Risk Score	Target score	Target Date	Flight Path
CLS EA 002	Educational Activities – Pandemic	Richard Brookes	4	4	16		10 Dec	1	1	1		31-Aug-2021	

APPENDIX 4

Code	Title	Risk owner	Current Impact	Current Likelihood	Current Risk Score	Current score	Latest Note Date	Target Impact	Target Likelihood	Risk Score	Target score	Target Date	Flight Path
							2020						



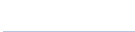






Department Description City of London Schools for Girls

Department Description: City of London Schools for Girls 1

Code	Title	Risk owner	Current Impact	Current Likelihood	Current Risk Score	Current score	Latest Note Date	Target Impact	Target Likelihood	Risk Score	Target score	Target Date	Flight Path
CLSG-01	Loss of income due to drop in student numbers	Jenny Brown; Ena Harrop	8	3	24		10 Dec 2020	4	2	8		31-Aug-2021	




Department Description City Surveyor's

Department Description: City Surveyor's 3

Code	Title	Risk owner	Current Impact	Current Likelihood	Current Risk Score	Current score	Latest Note Date	Target Impact	Target Likelihood	Risk Score	Target score	Target Date	Flight Path
SUR CB 003	City Bridges: – Substantial vessel strikes	Paul Wilkinson	8	2	16		10 Dec 2020	8	2	16		31-Mar-2021	
SUR CB 006	City Bridges: – Wanton Damage / Terrorism	Paul Wilkinson	4	4	16		10 Dec 2020	2	3	6		31-Mar-2021	
SUR CB 007	City Bridges: – Tunnelling for the Thames Tideway Tunnel	Paul Wilkinson	4	4	16		10 Dec 2020	4	4	16		31-Mar-2021	




Department Description Department of Community & Children's Services

Department Description: Department of Community & Children's Services 1

Code	Title	Risk owner	Current Impact	Current Likelihood	Current Risk Score	Current score	Latest Note Date	Target Impact	Target Likelihood	Risk Score	Target score	Target Date	Flight Path
DCCS ED 001	Failure to deliver City of London Academy expansion programme	Gerald Mehrtens	4	4	16		10 Dec 2020	2	2	4		30-Jul-2021	




Department Description Department of the Built Environment

Department Description: Department of the Built Environment 1




Code	Title	Risk owner	Current Impact	Current Likelihood	Current Risk Score	Current score	Latest Note Date	Target Impact	Target Likelihood	Risk Score	Target score	Target Date	Flight Path
DBE-TP-01	Road Traffic Collision caused by City of London staff or contractor who is unfit to drive while on City business	Vince Dignam	8	2	16		11 Dec 2020	8	1	8		31-Dec-2021	

Department Description Director of Open Spaces

Department Description: Director of Open Spaces 2







Code	Title	Risk owner	Current Impact	Current Likelihood	Current Risk Score	Current score	Latest Note Date	Target Impact	Target Likelihood	Risk Score	Target score	Target Date	Flight Path
OSD 004	Repair and Maintenance of Buildings and Structural Assets	Colin Buttery; Sue Ireland	8	2	16		07 Dec 2020	8	2	16		31-Mar-2021	

APPENDIX 4

Code	Title	Risk owner	Current Impact	Current Likelihood	Current Risk Score	Current score	Latest Note Date	Target Impact	Target Likelihood	Risk Score	Target score	Target Date	Flight Path
OSD 007	Maintaining the City's water bodies	Colin Buttery	8	2	16		07 Dec 2020	8	1	8		31-Mar-2022	




Department Description Guildhall School of Music and Drama

Department Description: Guildhall School of Music and Drama 2

Code	Title	Risk owner	Current Impact	Current Likelihood	Current Risk Score	Current score	Latest Note Date	Target Impact	Target Likelihood	Risk Score	Target score	Target Date	Flight Path
GSMD OSCH 008	Risk of Not being prepared for a second wave of Covid-19	Jonathon Poyner	8	2	16		11 Dec 2020	8	1	8		31-Mar-2021	
GSMD SUS 004	Failure to mitigate against a potential fall in EU student numbers as a result of Brexit	Jo Hutchinson; Jonathan Vaughan	4	4	16		09 Dec 2020	4	2	8		30-Sep-2021	




Department Description Mansion House/Central Criminal Court

Department Description: Mansion House/Central Criminal Court 1

Code	Title	Risk owner	Current Impact	Current Likelihood	Current Risk Score	Current score	Latest Note Date	Target Impact	Target Likelihood	Risk Score	Target score	Target Date	Flight Path
MAN CCC 002	Working at Height	Vic Annells	8	2	16		09 Dec 2020	4	2	8		31-Mar-2020	




Department Description Remembrancer's

Department Description: Remembrancer's 1

Code	Title	Risk owner	Current Impact	Current Likelihood	Current Risk Score	Current score	Latest Note Date	Target Impact	Target Likelihood	Risk Score	Target score	Target Date	Flight Path
REM PA 001	Impact of Brexit on the legislative and regulatory landscape	Paul Double	4	4	16		11 Dec 2020	2	2	4		31-Dec-2020	

Department Description Town Clerk's

Department Description: Town Clerk's 1

Code	Title	Risk owner	Current Impact	Current Likelihood	Current Risk Score	Current score	Latest Note Date	Target Impact	Target Likelihood	Risk Score	Target score	Target Date	Flight Path
TCO 013 (formerly CVD19 SGPS 07)	Annual Canvass (TC ES)	Charlotte Gordon	4	4	16		26 Nov 2020	4	3	12		28-Feb-2021	

Committees: Audit and Risk Management	Dated: 13 01 2021
Port Health and Environmental Services Committee	20 01 2021
Subject: Deep Dive: CR21 Air Quality	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	2 and 11
Does this proposal require extra revenue and/or capital spending?	No
Report of Jon Averbs	For Information
Report author: Ruth Calderwood Air Quality Manager, Markets and Consumer Protection Dept.	

Summary

Air quality is currently an amber corporate risk, with a risk score of 12. It was initially designated a red corporate risk; however, the risk has been reduced. This is due to ongoing improvements in air quality together with the wide range of action that has been and continues to be taken by the City Corporation to mitigate the risk. The risk reflects the potential impact on the health of residents, workers and visitors to the Square Mile. It also reflects the potential reputational and financial risk to the City of London Corporation. The target is to achieve a risk score of 6.

Extensive air quality monitoring across the Square Mile demonstrates that air quality is improving. There has been a particularly marked improvement in the area of the Square Mile that meets the health-based targets for nitrogen dioxide (a product of fuel combustion). This has gone from very small patches of the Square Mile in 2016 to 30% in 2018, increasing to 67% in 2019. The impact of the response to the COVID19 pandemic led to a further reduction in nitrogen dioxide across the City during 2020. Overall, levels of nitrogen dioxide were 35 – 40% lower than in 2019, with particulate matter, PM₁₀, being around 10% lower over the same period. Once activity starts to return to near normal, levels of air pollution will increase.

Air quality targets and obligations were set out in European Directives. Now the United Kingdom has left the European Union, the government has published an Environment Bill to enact the provisions into domestic law. The Bill includes proposals for new air quality targets for fine particles PM_{2.5}, and for an additional air pollutant, which is yet to be defined. The targets are likely to be influenced by World Health Organisation Guidelines, which are tighter than those set in European Directives. The Environment Bill also includes proposals for passing more responsibility for improving air quality to local government than exists under current legislation. This renewed responsibility could pose a challenge for the City Corporation due to its size and location. A significant proportion of the pollutant PM_{2.5} measured within the Square Mile is not generated within its boundary.

Whilst increasing the obligation on local government to achieve air quality targets, the Environment Bill does not include adequate provisions for the powers that local authorities may need to reduce air pollution to an acceptable level in their area. The City Corporation has therefore developed proposals for an Emission Reduction (Local Authorities in London) Bill. The Bill, which has the support of London Councils, proposes adoptive powers for all London local authorities to reduce emissions of pollutants from a wide range of combustion plant used for heating and electricity generation. The Bill was introduced to the House of Lords as a Private Member's Bill on Monday 13th January 2020. The provisions of the Bill are being used to influence the contents of the Environment Bill as it passes through parliament.

Ongoing research into poor air quality has led to it being linked to an increasing range of diseases. Academic papers have been published suggesting a link between exposure to PM_{2.5} and the impact of COVID19 on health. However, these papers have not been peer reviewed and should be treated with caution. On December 16th, 2020, a Coroner ruled that exposure to air pollution contributed to the death of a London child. It is the first time that air pollution has been explicitly linked to a named individual's death in the United Kingdom. During 2021, close attention will be paid to the air quality risk. It is likely to evolve due to the Coroner's ruling, change in statutory obligations and ongoing research into the health effects of air pollution, which includes the forthcoming changes to World Health Organisation Air Quality Guidelines.

The City Corporation is exceeding its current statutory duty to improve air quality and is widely regarded as demonstrating leadership in this area. Air quality, particularly nitrogen dioxide, is improving year on year. However, the City Corporation must not become complacent. In order to adequately deal with the air quality risk, the City Corporation needs to remain agile and proactive in its approach and must continue to deliver a high-quality influential programme that will serve to fulfil all statutory obligations and minimise the risk of air pollution to public health.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. Being located at the heart of London, the Square Mile experiences some of the highest levels of air pollution in the country. Local air pollution is affected by emissions of pollutants from both within the Square Mile, and beyond its boundary. It is also affected by the weather and the size, shape and proximity of buildings, which can act to trap pollution. The pollutants of concern are nitrogen

dioxide, which is a colourless, odourless gas that is a product of fuel combustion, and fine particulate matter (PM₁₀ and PM_{2.5}), which comes from a variety of sources.

2. Air quality is currently an amber corporate risk with a risk score of 12, see Appendix 1. It was initially designated a red corporate risk, but the risk has been reduced due to ongoing improvements in air quality and the wide range of action being taken by the City Corporation to further mitigate the risk. The risk reflects the potential impact on the health of residents, workers and visitors to the Square Mile. It also reflects the potential reputational and financial risk to the City of London Corporation as an organisation. The target is a risk score of 6.
3. The impact of air pollution on health is both acute and chronic. Research into the health impacts is ongoing and it is being linked to an increasingly wide range of diseases. The main health impact is cardiovascular and cardiopulmonary disease, lung cancer and respiratory disease. It also affects lung development in children. Short term pollution episodes can lead to an increase in hospital admissions for vulnerable people. Exposure to current levels of air pollution in central London over the long term has been shown to reduce life expectancy across the whole population.
4. On December 16th, 2020, a Coroner ruled that exposure to air pollution contributed to the death of a London child. The cause of death is cited as acute respiratory failure, severe asthma and air pollution exposure. It is the first time that air pollution has been explicitly linked to a named individual's death. The Coroner has asked for submissions to be made to him by mid-January 2021 so he can prepare a 'prevention of future deaths report'. This report is likely to be relevant to the City Corporation exercising its local authority responsibilities for air quality and public health. Once further information is available, consideration will be given to the potential impact of the verdict, and associated reports, on the air quality risk.
5. Academic research papers have been published showing a potential link between exposure to air pollution, particularly fine particle matter, and the impact of COVID19 on health. However, the research is in its early stages and the papers have not yet been peer reviewed, so an element of caution is required when considering the findings. Officers will continue to follow this research closely.

Statutory Duty

6. Responsibility for improving air quality lies with local, regional and national government. To date, the statutory responsibility of local government in London has been to assist the government and Mayor of London with action to ensure that levels of air pollution are lower than limits set in European Union (EU) Directives.
7. Air quality in the UK meets the EU air quality limits for all pollutants except nitrogen dioxide (NO₂). Levels of fine particles (PM₁₀ and PM_{2.5}) in the Square Mile meet current EU limits, though they are higher than World Health

Organisation (WHO) Guidelines. Table 1 shows the difference between EU limits and WHO guidelines for nitrogen dioxide and fine particles.

8. The current responsibility for controlling levels of PM_{2.5} lies with national, not local, government. This is because it is classed as a 'regional pollutant' over which local authorities have very little control. Particulate matter can stay in the air for a very long time and move around with the wind. Local authorities have a statutory obligation under the Health and Social Care Act 2012 to improve the public health of their population. One of the indicators used to assess performance with obligations under this legislation is exposure of the population to PM_{2.5} particle pollution.
9. As levels of air pollution do not meet health-based limits in the Square Mile, the City Corporation has an obligation to produce an Air Quality Action Plan. Under current duties, the Plan must outline action that will be taken to assist the government in its obligation to improve air quality, and to help people reduce their exposure to the highest levels of air pollution.
10. The City Corporation's Action Plan has been incorporated into an Air Quality Strategy. The latest Air Quality Strategy was published in September 2019. The aims of the strategy are to:
 - a. fulfil statutory obligations for London Local Air Quality Management and improving public health
 - b. ensure that air quality in over 90% of the Square Mile meets the health-based Limit Values and World Health Organisation Guidelines for nitrogen dioxide by the beginning of 2025
 - c. support the Mayor of London to meet World Health Organisation Guidelines for particulate matter (PM₁₀ and PM_{2.5}) by 2030
11. There are 65 actions in the strategy that focus on air quality monitoring, collaborative action, demonstrating leadership, reducing emissions and raising awareness.
12. Progress with actions, together with the most recent air quality data, is reported to the Mayor of London and government each year. These are statutory reports that are presented to the Port Health & Environmental Services Committee. The latest report was presented on 21st July 2020. A summary report, which includes air quality data over seven years up to and including 2019, is attached to this report as Appendix 2.
13. The government is drawing environmental law post Brexit through the Environment Bill. This should receive Royal Assent in spring 2021. The Bill sets out a requirement for a legally binding domestic air quality target, with an additional specific target for PM_{2.5}. The World Health Organisation has set air quality guidelines for different pollutants. These are currently being reviewed with the outcome expected in 2022. The WHO guidelines are likely to be tightened and will influence the air quality targets proposed in the Environment Bill.

14. The Bill also includes provisions to reform *Local Air Quality Management*, which provides the framework for local authority statutory obligations. Local authority's obligations for improving air quality in the Environment Bill are more binding than at present as they require local authorities to prepare a Plan to ensure that air quality standards and targets are *met and maintained*. This increased statutory obligation could pose a challenge for the City Corporation as much of the pollution, particularly PM_{2.5}, measured in the Square Mile originates from outside its boundary. It is therefore not within the direct control of the City Corporation.
15. The Environment Bill proposes to amend aspects of the Clean Air Act 1993 to enable simplified enforcement of Smoke Control Areas. It does not however include proposals for additional powers to deal with the full range of combustion plant found in urban areas that are used to generate heat or electricity (boilers, generators and combined heat and power plant). The City Corporation has attempted to address this through its own Emission Reduction (Local Authorities in London) Private Members Bill, This Bill, which has the support of London Councils, proposes adoptive powers for all London local authorities to reduce emissions of pollutants from a wide range of combustion plant used for heating and electricity generation. The Bill was introduced to the House of Lords as a Private Member's Bill on Monday 13th January 2020.
16. The proposals in the Emission Reduction (Local Authorities in London) Private Members Bill are being used to influence the contents of the Environment Bill as it passes through Parliament. In March 2020, a submission was made to the Public Bill Committee promoting the benefits of the contents of the Emission Reduction (Local Authorities in London) Bill. The contents of the Bill will also be tabled when the Environment Bill is presented to the House of Lords in the New Year.

Levels of air pollution in the Square Mile

17. The City Corporation runs an extensive network of air quality monitors. The amount of air pollution in the City of London at any given time is influenced by a range of factors. The main factor affecting day to day levels of air pollution is the weather.
18. Given that weather patterns have a strong influence on air pollution, annual average data is assessed to see if air pollution is improving over time. The data collected demonstrates a clear pattern of improvement over the past few years. Table 1 shows the concentrations of pollutants measured at specific sites. This data has been extrapolated using a computer model to show that the area of the Square Mile that meets the EU and WHO health-based target for nitrogen dioxide. In 2016 only small patches of the City met the annual average nitrogen dioxide target. This increased to 30% in 2018 and 67% in 2019.
19. The reduction in activity associated with the COVID 19 pandemic has led to further improvements in air quality, albeit short term. Overall, levels of nitrogen dioxide were 35 – 40% lower in the Square Mile in 2020 than in 2019, with a marked reduction being seen during the first lockdown. Particulate matter was

around 10% lower in 2020 than 2019. Once activity starts to return to near normal, levels of pollution will increase.

20. In March 2020, an experimental traffic order was applied to Beech Street to restrict through traffic to zero emission vehicles. This, along with the impact of the COVID19 pandemic on activity in London, led to a reduction in nitrogen dioxide in Beech Street itself by over 50% when compared to 2019. PM₁₀ reduced by 18% in Beech Street over the same period. This significant reduction in both pollutants was expected as Beech Street is a covered road and any pollution emitted in the street is unable to disperse easily. Consequently, removing traffic emissions from Beech Street has a greater impact on air pollution in that street than a similar scheme would have on other roads in the City.
21. Although levels of fine particles (PM₁₀ and PM_{2.5}) are also falling across the Square Mile, the overall reduction is not as dramatic as for nitrogen dioxide. This is because particulate matter is made up of many sources, some of which travel very long distances and stay in the air for a long time.

Location	Pollutant	EU Limit value	WHO Guideline	Annual average 2018 (µg/m ³)	Annual average 2019 (µg/m ³)	Annual average 2020* (µg/m ³)
Aldgate School formerly Sir John Cass Foundation Primary School (background)	Nitrogen dioxide	40	40	32	33	22
	PM ₁₀	40	20	21	19	17
	PM _{2.5}	25	10	12	12	12
Upper Thames Street (roadside)	Nitrogen dioxide	40	40	87	74	43
	PM ₁₀	40	20	32	27	24
Beech Street (roadside)	Nitrogen dioxide	40	40	69	62	28
	PM ₁₀	40	20	25	22	18
Farringdon Street (roadside)	PM _{2.5}	25	10	16	14	12

Table 1

*Data for 2020 is provisional

Risk Mitigation

22. In order to reduce the risk associated with poor air quality in the Square Mile, the City Corporation needs to demonstrate that, at a minimum, it is fulfilling its statutory obligation and that it has taken, and will continue to take, a wide range of action to bring about improvements to air quality. The City Corporation must

also ensure that it takes necessary steps to protect the health of residents, workers and visitors to the City through the provision of appropriate information and robust and reliable data.

23. Actions to demonstrate risk mitigation are detailed in the 2019 Air Quality Strategy. Recent examples include:

- a. Reducing emissions of air pollution from its own fleet, buildings and activities.
- b. Increasing the number of pedestrianised and pedestrian priority streets.
- c. A zero-emission street pilot.
- d. Working with Barts Health NHS Trust to reduce emissions of air pollution from the energy centre
- e. Developing and disseminating guidance on minimising emissions from combustion plant in buildings
- f. Developing and disseminating guidance on minimising emissions from food premises
- g. Hosting best practice events for all London Boroughs
- h. Working with a range of partners to reduce emissions of air pollutants from the Thames river vessels
- i. Working with City businesses to encourage emission reduction from their activities
- j. Jointly leading a London Borough wide idling engine programme with the London Borough of Camden, supported by the Mayor of London
- k. Working with City schools and nurseries to develop tailored action plans to improve local air quality.
- l. Updating the free smart phone App, CityAir, which provides high pollution alerts and helps users avoid areas of poor air quality.

24. The City Corporation is recognised as the lead local authority for air quality policy across London. Officers are regularly called upon to provide expertise as part of various regional and national working groups that influence air quality policy and research.

25. There are some issues that make air quality improvements challenging in the Square Mile. For example, due to its location, the Square Mile is heavily influenced by pollution generated across London and the south east. This is recognised by the range of leadership and collaborative work undertaken by the City Corporation, such as the development of the Emission Reduction (Local Authorities in London) Private Member's Bill which would provide adoptive powers for all London Boroughs and the City Corporation.

26. There is an additional potential risk with the availability and interpretation of data. The high level of interest in air pollution has led to relatively low-cost air quality monitoring devices becoming widely available. However, measuring air quality accurately is not straight forward and requires the use of certified equipment that is subject to regular calibration, audits and a rigorous data validation process. The new generation of air quality monitors are uncertified and, when tested against certified equipment, are often shown to be inaccurate, unprecise and the data drifts over time. The City Corporation's latest Air Quality Strategy recognises the role that the authority must play in providing robust and reliable data. The strategy includes an action to test new equipment

whenever possible. The Air Quality Manager is also part of a national working group considering certification schemes for the new low-cost sensors.

Corporate & Strategic Implications

Strategic implications

27. The work on air quality directly supports two Corporate Plan outcomes:

No. 2. People enjoy good health and wellbeing

No. 11. We have clean air, land and water

28. Improving air quality is overseen by Port Health and Environmental Services Committee and is a priority for the Health and Wellbeing Board. It is also of interest to the Planning and Transportation and Streets and Walkways Committees.

29. Improving air quality is firmly embedded into a range of corporate policies and strategies such as the Transport Strategy, draft City Plan, Responsible Business Strategy and Procurement Strategy. In 2020 the City Corporation published a Climate Action Strategy. Steps taken to deliver the outcomes of this strategy, such as moving a greater use of renewable energy, will lead to further air quality improvements locally.

Financial implications

30. The Air Quality Team local risk budget in 2020/21 is £388,000. As part of the 12% savings required to remain within the Department's resource envelope following the introduction of the Target Operating Model, there may need to be a reduction in the non-staffing element of the budget for 2021/21. Although the details have not yet been confirmed, it is anticipated that the 65 actions contained within the air quality strategy can still be delivered from existing resources. External funding and grants to support projects and programmes in the Square Mile and across London are sought wherever possible.

Resource implications

31. A small team of 4 officers deliver the City Corporation's air quality programme. The team collaborates very closely with other City departments. The Air Quality Team is part of the Consumer Protection side of the current Department of Markets & Consumer Protection, which under the Target Operating Model, will be incorporated into the new Environment Department. At this time, it is not envisaged that the Target Operating Model will have an impact on the Air Quality Team's staffing resource.

Legal implications

32. The City Corporation has a statutory duty to measure air quality and develop and implement an action plan to improve air quality where targets are not met. The Environment Bill, which is currently passing through parliament, contains proposals to place increased responsibility on local authorities to meet air quality targets. Due consideration will be given to the implications of this increased statutory obligation once the Bill receives Royal Assent.
33. Consideration will also be given to the potential legal implications of the recent Coroner's ruling on the death of a London Child that died from acute respiratory failure, severe asthma and air pollution exposure.

Risk implications

34. During 2021, close attention will be paid to the air quality risk. It is likely to evolve due to the Coroner's ruling cited in paragraph 33 and the change in statutory obligations cited in paragraph 32. The outcome of the ongoing research into the health effects of air pollution, which includes any association with the impact of COVID19 on health, together with the forthcoming changes to World Health Organisation Air Quality Guidelines, will also be considered.

Equalities implications

35. A 'test of relevance equalities analysis' was undertaken for the 2019 Air Quality Strategy. Action to improve air quality has a positive impact on all sections of the population. The benefit is greatest for children and the elderly as they are more susceptible to the health impacts of air pollution. There is also a positive impact on individuals whose lives are affected by asthma and other respiratory and cardiovascular conditions.

Security implications

36. None

Conclusion

37. Air quality is currently an amber corporate risk with a risk score of 12. It was initially designated a red corporate risk; however, the risk has been reduced. This is due to ongoing improvements in air quality, together with the wide range of action that has been, and continues to be, taken by the City Corporation to further mitigate the risk. The target is a risk score of 6.
38. During 2021, close attention will be paid to the air quality risk. It is likely to evolve due to the recent Coroner's ruling on the death of a London child that died from

acute respiratory failure, severe asthma and air pollution exposure. It will also be influenced by the change in statutory obligations and ongoing research into the health effects of air pollution, which includes any association with the impact of COVID19 on health, and changes to World Health Organisation Air Quality Guidelines.

39. Air quality in the City is improving. There is, however, some way to go before the air will be classed as 'healthy to breathe' at all locations. Given the issues cited above, the City Corporation must not become complacent. It must continue to deliver a high-quality influential programme that will serve to fulfil all statutory obligations and minimise the risk of air pollution to public health.

Appendices

- Appendix 1 – Risk and Progress Summary for CR21: Air Quality
- Appendix 2 – Air Quality Annual Status Summary Report 2020

Background Papers

- Deep Dive Reports to Audit and Risk Management Committee on Air Quality 14 June 2016, 6 November 2018, 28 January 2019
- City of London Air Quality Strategy 2019 – 2025
- City of London Annual Status Report 2020
- Emission Reduction (Local Authorities in London) Bill 2019

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CR21 AIR QUALITY RISK- Detailed risk register with Flight path

Report Author: Paul Dudley

Generated on: 18 December 2020



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	Flight path (Assessment history since creation date)
<p>CR21 Air Quality</p> <p>2006 71</p> <p>07-Oct-2015</p> <p>Ruth Calderwood</p>	<p>Cause: Levels of air pollution in the City, specifically nitrogen dioxide and fine particles, impact on the health of residents, workers and visitors. The City Corporation has a statutory duty to take action to improve local air quality.</p> <p>Event: The City of London Corporation is insufficiently proactive and resourced, and does not have the right level of competent staff, to be able to fulfil statutory obligations, as a minimum, in order to lower levels of air pollution and reduce the impact of existing air pollution on the health of residents, workers and visitors.</p> <p>Effect: The City Corporation does not fulfil statutory obligations and air pollution remains a problem, impacting on health. Potential for legal action against the Corporation for failure to deliver obligations and protect health. Adverse effect on ability to deliver outcomes 2 and 11 of the Corporate Plan</p>	<p>Likelihood</p> <p>Impact</p>	12	<p>Air pollution has reduced substantially during 2020 which is largely due to the decline in activity associated with the response to the COVID 19 pandemic. This is likely to be temporary, so no change has been made to the risk rating at this stage.</p> <p>During 2021, close attention will be paid to the air quality risk. It is likely to evolve due to: a recent Coroner's ruling that air pollution was a contributory factor in the death of a London child; forthcoming change in statutory obligations and ongoing research into the health effects of air pollution, which includes the changes to World Health Organisation Air Quality Guidelines</p> <p>18 Dec 2020</p>	<p>Likelihood</p> <p>Impact</p>	6	31-Dec-2024	

Action no, Title,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
CR21 001h Publish annual report of air quality data	Develop baseline model for compliance assessment and publish annual report of air quality data	Baseline model for compliance assessment has been developed. Area of the Square Mile that met the nitrogen dioxide targets in 2019 was 67%, up from 30% in 2018	Ruth Calderwo od	15-Dec-2020	31-Dec-2025
CR21 001i Compliant vehicles	100% of vehicles owned or leased by the CoL are electric or hybrid by 2025	There are 7 electric cars, 4 electric vans and 1 electric minibus in the Corporate Fleet	Ruth Calderwo od	07-Dec-2020	31-Dec-2025
CR21 001j Develop Private Members Bill	Develop and support an Emission Reduction Private Members Bill for London local authorities	The contents of the Emission Reduction (Local Authorities in London) Bill will be used to influence the Environment Bill as it passes through the House of Lords, early 2021. A submission was made to the Public Bill scrutiny committee for the Environment Bill	Ruth Calderwo od	15-Dec-2020	31-Dec-2021
CR211 Compliance with NO2 target	Assess percentage compliance rate with NO2 target	67% compliance in 2019	Ruth Calderwo od	07-Dec-2020	31-Dec-2024

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Appendix 2

Air Quality Annual Status Summary Report for 2019

1. Air Quality Monitoring

Nitrogen Dioxide (NO₂)

Nitrogen dioxide is measured at three locations using continuous (or automatic) analysers: Sir John Cass's Foundation Primary School (now known as the Aldgate School), Beech Street and Upper Thames Street. In 2019, it was also measured at a further 110 locations using low-cost diffusion tubes.

Air quality in the City has gradually been improving year on year. In 2019 there was a significant drop in annual average concentrations of nitrogen dioxide at roadside when compared to 2018. In Upper Thames Street NO₂ reduced by 14µg/m³ (16%) and in Beech Street it reduced by 7µg/m³ (10%). Despite this improvement, levels of nitrogen dioxide along many busy roads remain above the annual EU limit and World Health Organisation Guideline of 40 µg/m³.

Background concentrations stayed at similar levels, well below the EU limit with Sir John Cass's Foundation Primary School measuring an annual average of 33µg/m³ in 2019. The hourly EU limit for nitrogen dioxide was met at all three sites for the first time since monitoring began.

Small particles PM₁₀

PM₁₀ is measured at three locations using continuous (automatic) analysers: Sir John Cass's Foundation Primary School, Beech Street and Upper Thames Street. Levels of PM₁₀ are influenced by weather conditions. In 2019, levels of PM₁₀ decreased at all sites when compared to 2018. The largest decrease was 5µg/m³ along Upper Thames Street. All sites are below the annual and daily EU limit values, but above World Health Organisation Guidelines.

Fine particles PM_{2.5}

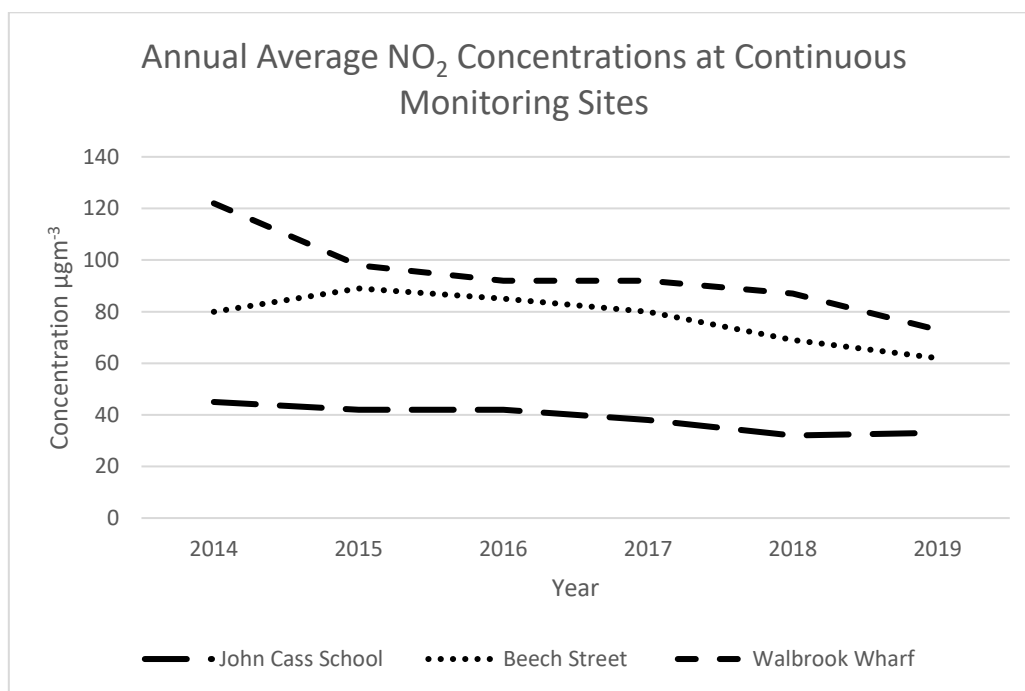
PM_{2.5} is measured at two locations, Farringdon Street and Sir John Cass's Foundation Primary School, using continuous (automatic) analysers. Concentrations are similar at both sites as it is a regional pollutant and strongly influenced by weather conditions. In 2019 there was a slight decrease in concentration at the roadside site (Farringdon) and levels stayed the same at the background site (John Cass). Both sites are below the annual and daily EU limit value but above World Health Organisation Guidelines.

2. Nitrogen Dioxide Data

The EU Limit Value and World Health Organisation Guideline is an annual mean of $40\mu\text{g}/\text{m}^3$

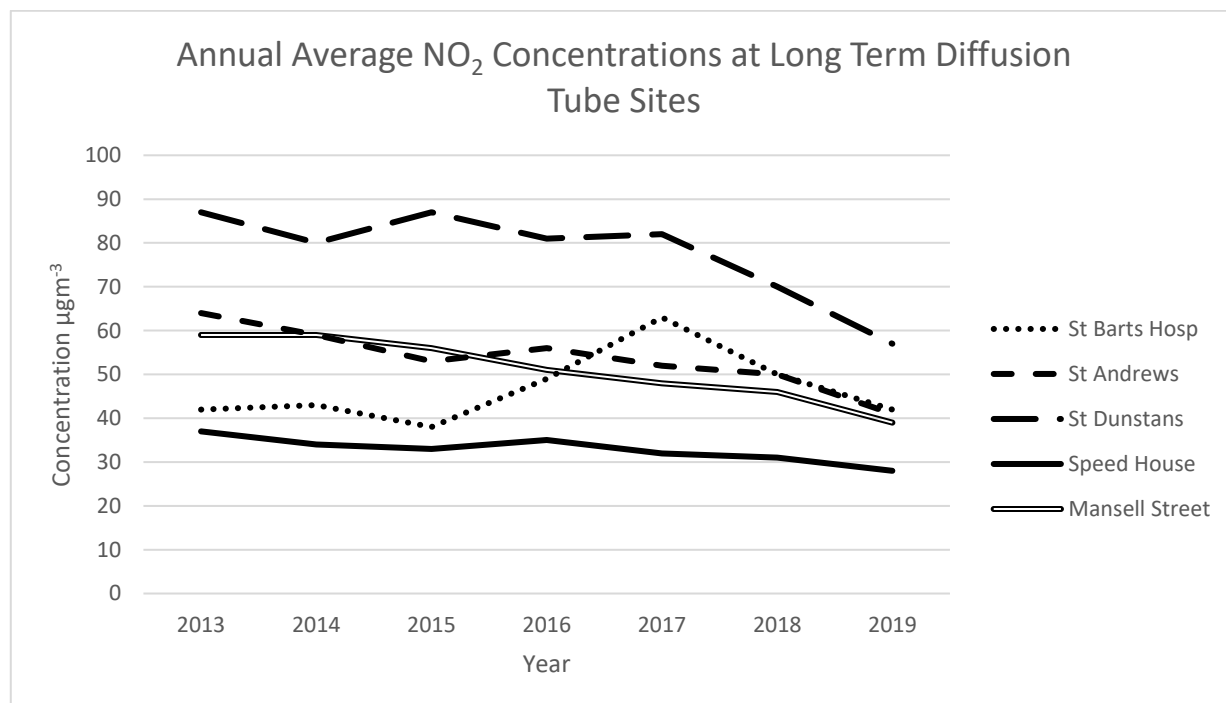
Long term continuous analysers

Site	Site type	Annual Mean ($\mu\text{g}/\text{m}^3$)						
		2013	2014	2015	2016	2017	2018	2019
John Cass's Foundation Primary School	Urban Background	47	45	42	42	38	32	33
Beech St	Roadside	81	80	89	85	80	69	62
Walbrook Wharf	Roadside	122	122	98	92	92	87	73



Long term diffusion tube sites

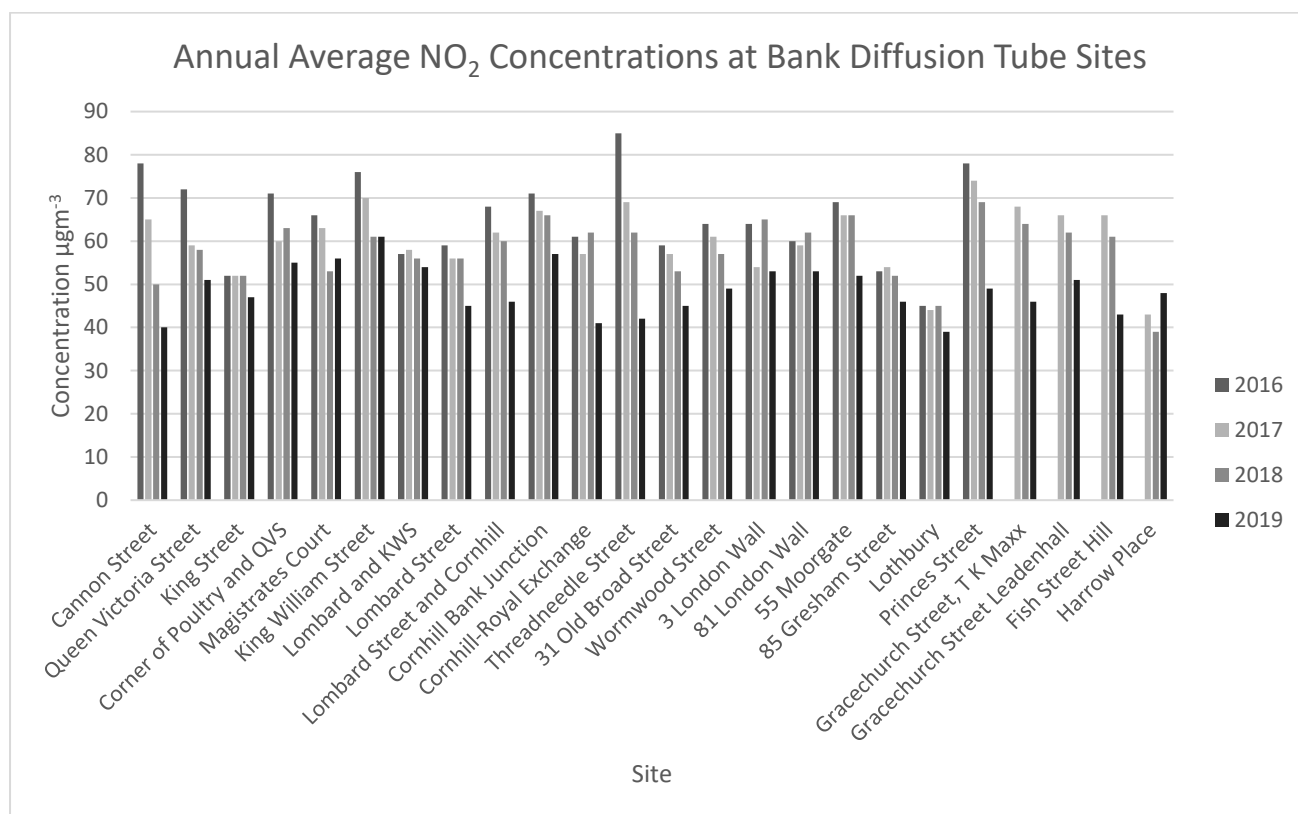
Site	Site type	Annual Mean ($\mu\text{g}/\text{m}^3$)						
		2013	2014	2015	2016	2017	2018	2019
St Bartholomew's Hospital Courtyard	Urban Background	42	43	38	49	63	50	42
St. Andrew's Church, Queen Victoria St	Roadside	64	59	53	56	52	50	41
Fleet Street	Roadside	87	80	87	81	82	70	57
Speed House, Barbican Estate	Urban Background	37	34	33	35	32	31	28
Guinness Trust Estate, Mansell St	Roadside	59	59	56	51	48	46	39



Diffusion tube sites measuring the impact of the Bank on Safety traffic scheme

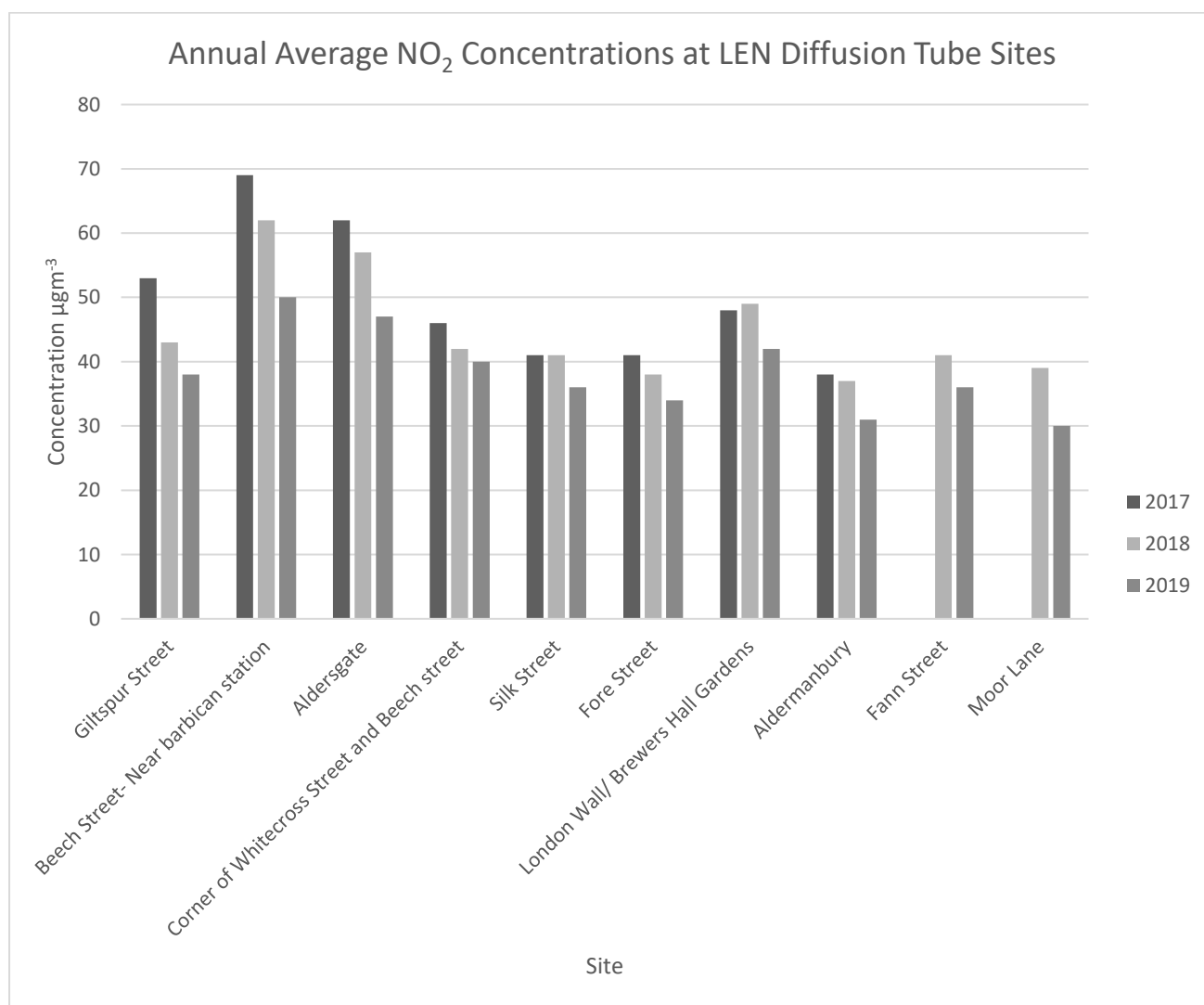
Site	Annual Mean ($\mu\text{g}/\text{m}^3$)			
	2016	2017	2018	2019
Cannon Street	78	65	50	40
Queen Victoria Street	72	59	58	51
King Street	52	52	52	47
Corner of Poultry and QVS	71	60	63	55
Magistrates Court	66	63	53	56

King William Street	76	70	61	61
Lombard and KWS	57	58	56	54
Lombard Street	59	56	56	45
Lombard Street and Cornhill	68	62	60	46
Cornhill Bank Junction	71	67	66	57
Cornhill-Royal Exchange	61	57	62	41
Threadneedle Street	85	69	62	42
31 Old Broad Street	59	57	53	45
Wormwood Street	64	61	57	49
3 London Wall	64	54	65	53
81 London Wall	60	59	62	53
55 Moorgate	69	66	66	52
85 Gresham Street	53	54	52	46
Lothbury	45	44	45	39
Princes Street	78	74	69	49
Gracechurch Street, T K Maxx	-	68	64	46
Gracechurch Street Leadenhall	-	66	62	51
Fish Street Hill	-	66	61	43
Harrow Place	-	43	39	48



Diffusion tube sites measuring the impact of the Low Emission Neighbourhood

Site	Annual Mean ($\mu\text{g}/\text{m}^3$)		
	2017	2018	2019
Giltspur Street	53	43	38
Beech Street- Near barbican station	69	62	50
Aldersgate	62	57	47
Corner of Whitecross Street and Beech street	46	42	40
Silk Street	41	41	36
Fore Street	41	38	34
London Wall/ Brewers Hall Gardens	48	49	42
Aldermanbury	38	37	31
Fann Street	-	41	36
Moor Lane	-	39	30

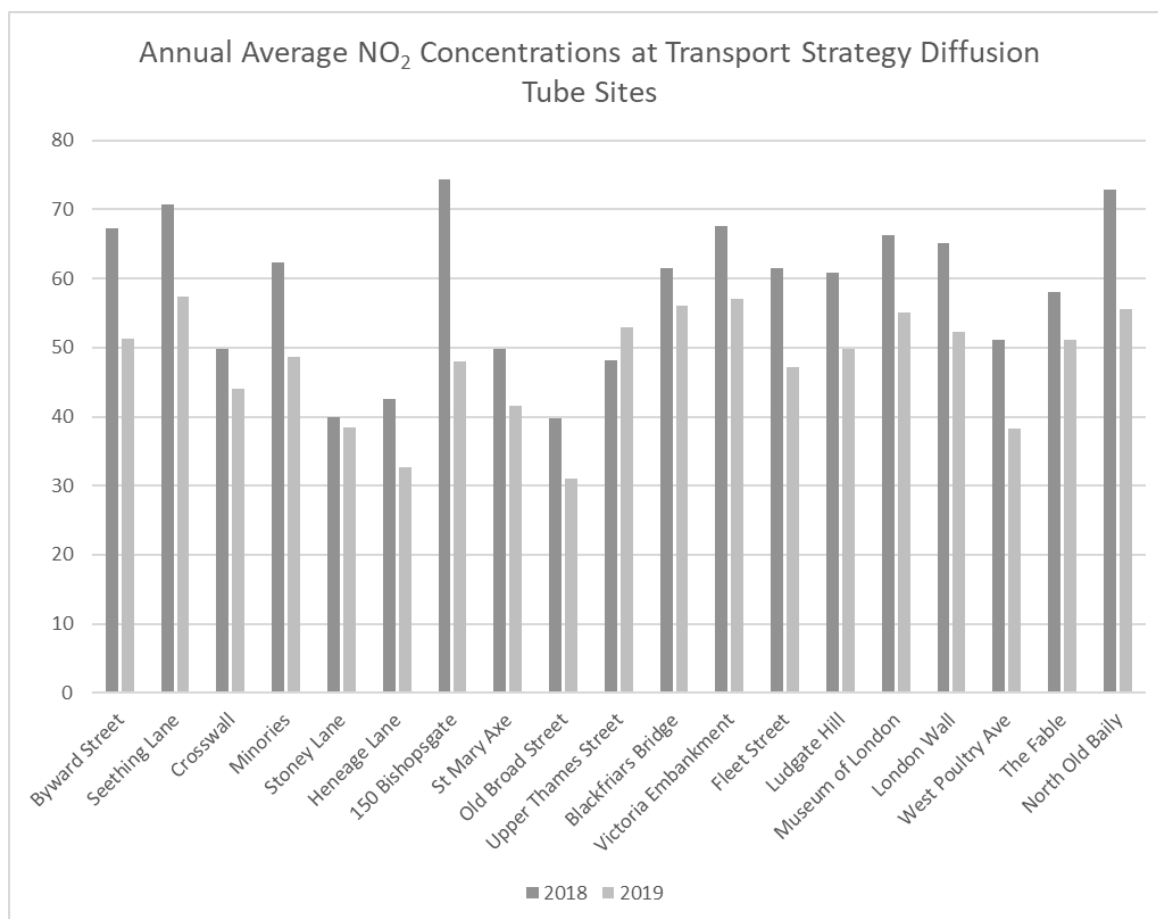


Diffusion tube sites - other

Site	Annual Mean ($\mu\text{g}/\text{m}^3$)	
	2018	2019
Sir John Cass School Front playground	40	37
Southwark Bridge	41	35
London Bridge	37	35
Liverpool Street	71	52
Fenchurch Avenue	36	35
Fetter Lane	56	44
St Mary at Hill's Churchyard	33	31
St Pauls	41	39
Whittington Gardens	42	37
Goodmans Yard	-	44

Diffusion tube sites to support the Transport Strategy

Site	Annual Mean ($\mu\text{g}/\text{m}^3$)	
	2018	2019
Byward Street	67	51
Seething Lane	71	57
Crosswall	50	44
Minories	62	49
Stoney Lane	40	39
Heneage Lane	42	33
150 Bishopsgate	74	48
St Mary Axe	50	42
Old Broad Street	40	31
Upper Thames Street	48	53
Blackfriars Bridge	62	56
Victoria Embankment	68	57
Fleet Street	62	47
Ludgate Hill	61	50
Museum of London	66	55
London Wall	65	52
West Poultry Ave	51	38
The Fable	58	51
North Old Baily	73	56



Diffusion tube sites to support the Beech Street Zero Emissions Street Project

Site	Annual Mean (µg/m ³)
	2019
Aldersgate Street	47
Bunhill Row/Chiswell Street	40
Moore Lane/Ropemaker Street	34
Moorgate	52
London Wall/ Moorgate	52
London Wall	49
Wood Street	29

Diffusion tube sites to support the St Pauls Gyratory Project

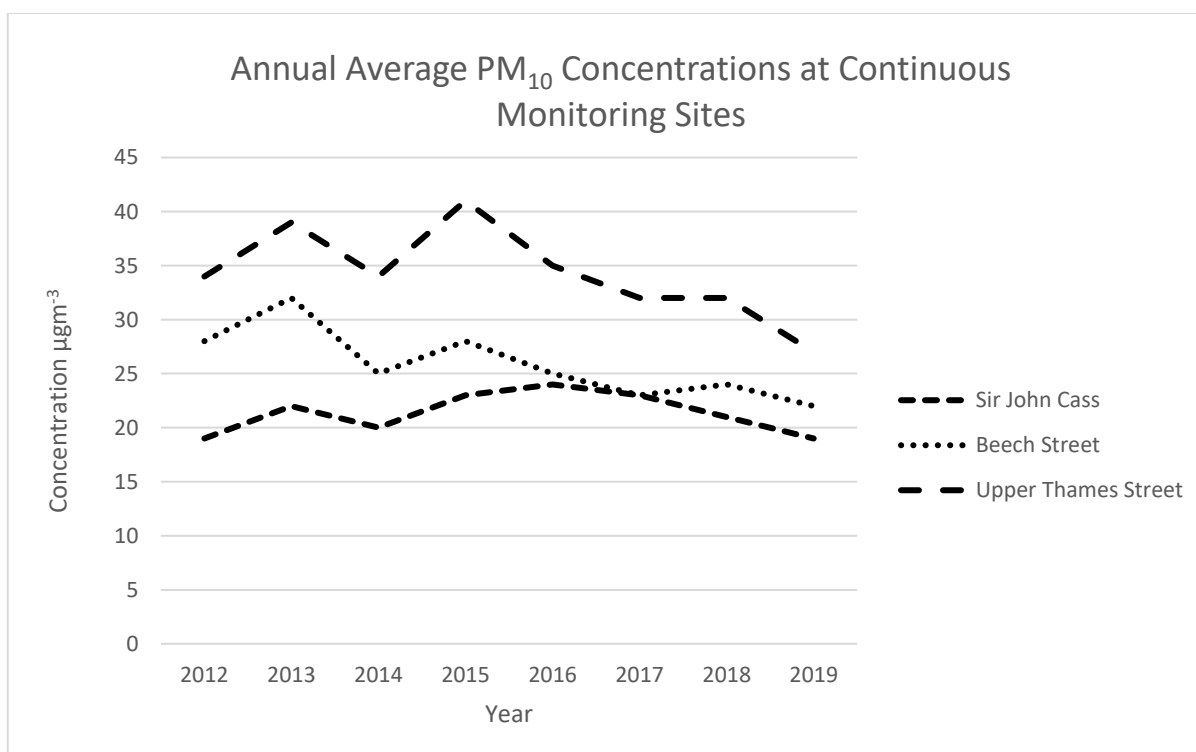
Site	Annual Mean (µg/m ³)
	2019
Montague Street	49
King Edward St/Angel St	48
Angel St	45

Angel Street/St Martins le Grand	44
Cheapside (underground entrance)	42
Cheapside/Foster Lane	45
New Change	50
Cheapside	48
Newgate/Warwick Lane	51
Newside, Warwick Lane	55
King Edward Street/Newgate	59

3. PM₁₀ Data

The annual average EU limit value is 40µg/m³, World Health Organisation Guideline is 20µg/m³

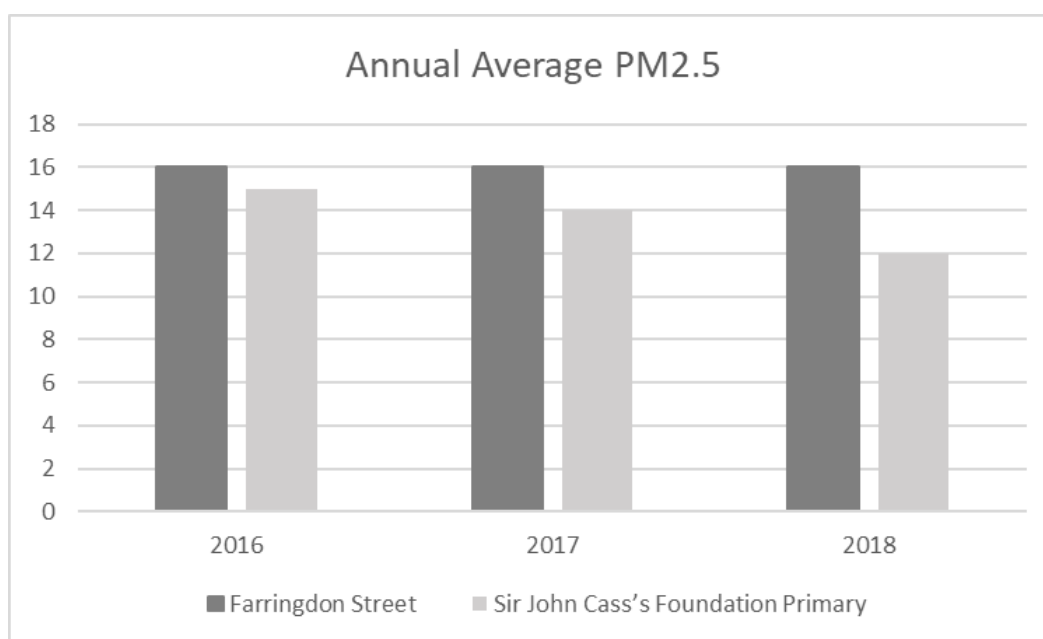
Site	Annual Mean (µg/m ³)						
	2013	2014	2015	2016	2017	2018	2019
John Cass's Foundation Primary School	22	20	23	24	23	21	19
Beech St	32	25	28	25	23	24	22
Upper Thames St	39	34	41	35	32	32	27



4. PM_{2.5} Data

The annual average EU limit value is 25µg/m³, World Health Organisation Guideline is 10µg/m³

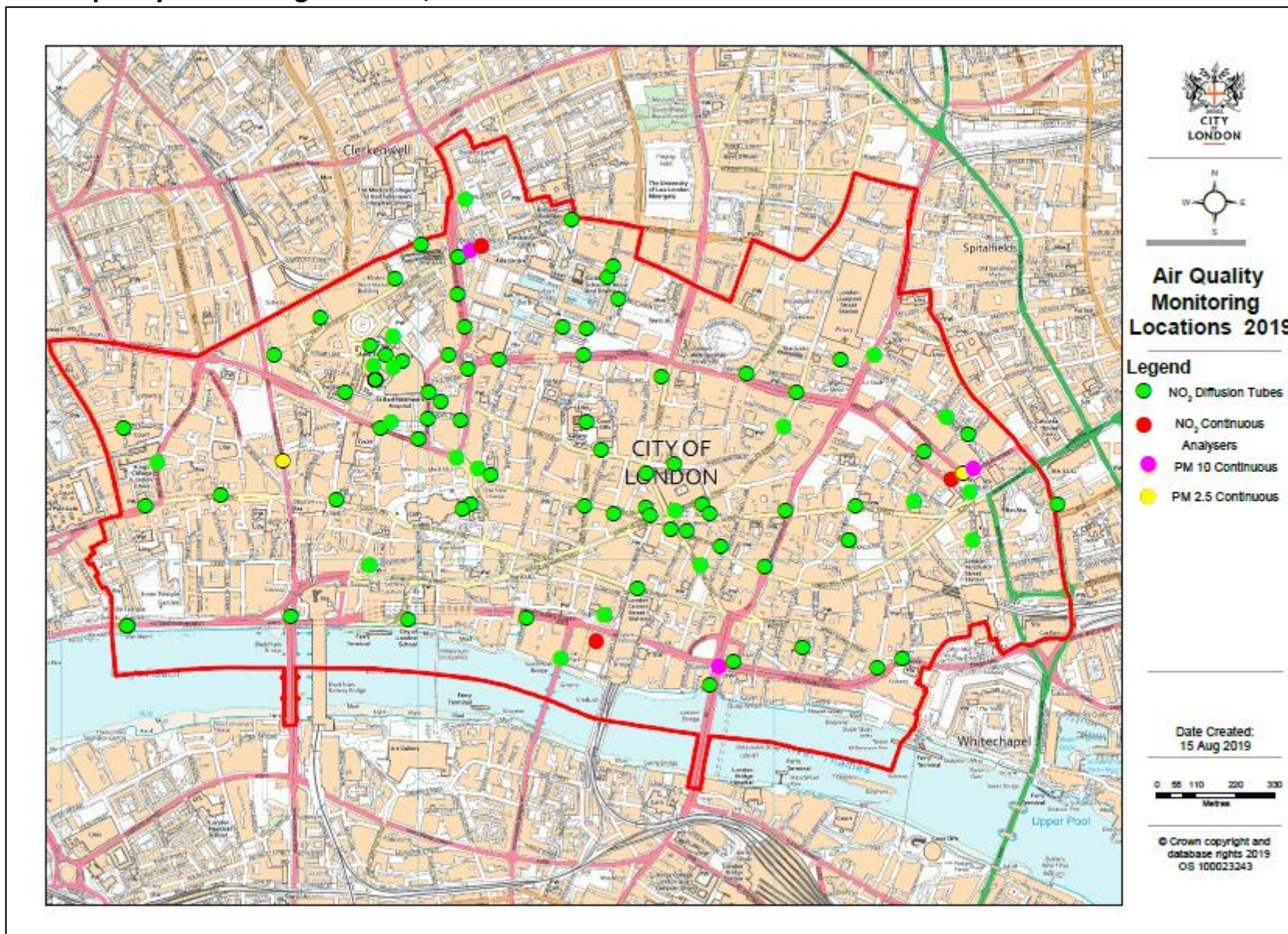
Site	Annual Mean (µg/m ³)			
	2016	2017	2018	2019
Farringdon Street	16	16	16	14
Sir John Cass's Foundation Primary	15	14	12	12



5. Monitoring locations

Air quality monitoring locations are reviewed annually. There are a number of core monitoring sites that are maintained. Other sites are added and removed according to the needs of research projects, planned programmes and local investigations or concerns. Locations where monitoring took place during 2019 are shown in Figure 1 overleaf.

Figure 1: Air quality monitoring locations, 2019



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