Appendix B: Wholesale Markets Risk Register

Report Author: Joanne Hill **Generated:** 27 August 2021



Risks are ordered by subject matter, then 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	D	Target Date/Risk Approach	Current Risk score change indicator
MCP-SM 012 Building maintenance- management 29-Sep-2020 Mark Sherlock	Cause: The deterioration of physical assets due to the lack of adequate maintenance Event: Partial collapse or failure of structure. Effect: Serious harm to building occupiers and members of the public by exposure to various physical hazards Loss of use of physical assets through accident investigations and enforcement authority prohibitions, etc Financial losses through potential Health and Safety Executive (HSE) fees for intervention, prosecution, civil claims and reputational damage to the City.	Likelihood	8	The survey reports have been received from City Surveyor's Department (CSD) and further site visits have taken place with consultants who are advising the City of London on the practical solutions to the initial recommendations made by the contractors that produced the survey reports. Meetings have taken place with CSD to agree works and funding priorities, CSD are now drafting initial Project Initiation Documents for review and submission for funding approvals. 23 Aug 2021	Impact Impact		31-Dec- 2021	Constant

Action no	Action description		Latest Note Date	Due Date
	City Surveyor's Department (CSD). CSD to raise PIDs to continue with further surveys and pricing exercises.		U	31-Oct- 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 & So	core	Target Date/Risk Approach	Current Risk score change indicator
MCP-BG 002 Building maintenance- management 29-Sep-2020 Daniel Ritchie	Cause: The deterioration of physical assets due to the lack of adequate maintenance Event: Partial collapse or failure of structure. Effect: Serious harm to building occupiers and members of the public by exposure to various physical hazards Loss of use of physical assets through accident investigations and enforcement authority prohibitions, etc Financial losses through potential Health and Safety Executive (HSE) fees for intervention, prosecution, civil claims and reputational damage to the City.	Likelihood	4	A full condition survey has been completed by the appointed contractor and the results shared with the City Surveyor's Department. The Superintendent is working with CSD to consider and address the recommendations made by the contractor. A strategy is being developed to ensure the market remains statutorily compliant and risks are suitably mitigated. The risk has been reassessed and, although the impact remains 'major', the likelihood of the adverse event occurring has been reduced to 'rare'. 27 Aug 2021	Impact	1	30-Nov- 2021	Decreasing

Action no	Action description			Latest Note Date	Due Date
	the recommendations made in the Conditions Survey and implement them as appropriate.	The Superintendent has met with City Surveyor's Department on several occasions to consider the recommendations made in the report. A strategy is being developed to ensure that the market continues to be statutorily compliant, recommendations are addressed, and risks suitably mitigated.	Daniel Ritchie	27-Aug- 2021	30-Nov-2021

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Sc	core	Risk Update and date of update	Target Risk Rating & So	core	Target Date/Risk Approach	Current Risk score change indicator
MCP-NS 003 Building maintenance- management	Cause: The deterioration of physical assets due to the lack of adequate maintenance Event: Partial collapse or failure of structure. Effect: Serious harm to building occupiers and members of the public by exposure to various physical hazards Loss of use of physical assets through accident investigations and enforcement authority prohibitions, etc Financial losses through potential Health and Safety Executive (HSE) fees for intervention, prosecution, civil claims and reputational damage to the City.	Impact		Consultation has taken place regarding the content of the Condition Survey. The 20 year plan has been updated to include items from the survey and these are now being examined in greater detail. Some items are to be deferred until further in-depth surveys have been completed. The risk has been reassessed and, although the impact remains 'major', the likelihood of the adverse event occurring has been reduced to 'rare'. 27 Aug 2021	Impact	1	01-Nov- 2021	Decreasing
Debbie Howard								

Action no	Action description		Action owner	Latest Note Date	Due Date
	the recommendations made in the Conditions Survey and	has been updated to include items from the survey and these are now being examined in greater detail. Some items are to be deferred until further in-depth surveys have been		27-Aug- 2021	01-Nov-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 & S	Score	Target Date/Risk Approach	Current Risk score change indicator
MCP-SM 001 HGV Unloading Operations 24-Feb-2015 Mark Sherlock	Cause: A lack of suitable and sufficient training and adequate management controls in relation to Heavy Goods Vehicle banksman activities undertaken by staff employed by Smithfield Market tenants. Event: Serious or life changing injury to members of the public, market staff and other service users caused by uncontrolled or unguided reversing vehicles. Effect: Realisation of this risk could result in a prosecution, fine and reputational damage for the City.	Impact		The risk score has been increased to 12 due to the 22% non-compliance outcome of the most recent banksman attendance audit. The Superintendent has written to the Tenants' Association and all carcass traders, all of whom met on 18 August to discuss the audit statistics and address the concerns raised. This risk will be reviewed again pending improvement actions and a re-audit on 5 September 2021. 20 Aug 2021	Impact	8	31-Dec- 2021	Increasing

Action no	Action description			Latest Note Date	Due Date
MCP-SM 001k		The risk score has been increased to 12 due to the 22% non-compliance outcome of the most recent banksman attendance audit. The Superintendent has written to the Tenants' Association and all carcass traders, all of whom met on 18 August to discuss the audit statistics and address the concerns raised. This risk will be reviewed again pending improvement actions and a re-audit on 5 September 2021.	Sherlock	0	31-Dec-2021

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating	& Score	Risk Update and date of update	Target Risk Rating &	Score	Target Date/Risk Approach	Current Risk score change indicator
MCP-BG 001 Workplace Transport 26-Apr-2017 Daniel Ritchie	Cause: A lack of suitable and sufficient training and adequate management controls in relation vehicle movements at Billingsgate Market. Event: There is a risk of a life changing injury to a pedestrian if vehicle movements including forklift trucks are not appropriately managed and controlled. Effect: An accident involving a pedestrian and a vehicle which resulted in a serious or life changing injury could result in prosecution, a fine, reputational damage for the City.	Impact	12	This risk has been reviewed and is being held at Amber until we have total compliance with our traffic management policies. 26 Aug 2021	Impact	8	30-Nov- 2021 Reduce	Constant

Action no	Action description		Latest Note Date	Due Date
MCP-BG 001e	Respond to recommendations and agree an action plan.	An action plan has been put in place to deal with the highest risk factors. This action will be completed by 30 September 2021.	26-Aug- 2021	30-Sep- 2021
	Complete actions and record evidence with a view to reducing the risk rating (if appropriate).	Actions are currently being addressed in order of priority. This action will be completed by 30 September 2021.	26-Aug- 2021	30-Sep- 2021
	Re-engage consultant to provide assurance that essential recommendations have been actioned and that the risk has reduced.	\mathcal{E}	- 0	30-Nov- 2021

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Sc	core Risk Update and date of u	pdate Target Risk Rating	& Score	Target Date/Risk Approach	Current Risk score change indicator
MCP-NS 001 Workplace Traffic Management 24-Feb-2015 Emma Beard; Sean Benton; Debbie Howard	Cause: Over 200 forklift trucks operate on the New Spitalfields Market site. Event: There is a serious risk of life changing injury to a pedestrian if vehicle movements in this constrained space are not appropriately managed and controlled. Effect: An accident involving a pedestrian and a vehicle which resulted in a serious or life changing injury could result in prosecution, a fine, reputational damage for the City and have an adverse impact on the operation and sustainability of the service.	Likelihood	Zero tolerance to produce placed in the Market Hall now being enforced and the roadways are kept clear of during trading hours. All actions from the Traff Management Plan are now The risk has, therefore, be to target and will be kept review. 27 Aug 2021	roadways is he main f all produce mpact ic w complete. een reduced	8	31-Dec- 2021	Decreasing

Action no	Action description			Latest Note Date	Due Date
MCP NS-001m	j	of trading hours.	Emma Beard; Debbie Howard	27-Aug- 2021	31-Dec-2021

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating	& Score	Risk Update and date of update	Target Risk Rating &	Score	Target Date/Risk Approach	Current Risk score change indicator
MCP-SM 011 Brexit - Impact of Brexit on traders and imports 06-Sep-2019 Mark Sherlock	Cause: The outcome of Brexit negotiations between the UK government and the EU fails to secure continuity of contracts and/or security of supply chains. Event: The market tenants fail to prepare appropriately for the end of the Brexit transition period on 31 December 2020. Uncertainty around the potential outcomes until it is too late to react. Effect: Delays and disruption in the food supply chain, and shortages of product over a prolonged period. There is also a risk, albeit unlikely, that this could impact the financial viability of some tenants' businesses. This in turn could lead to business failures and vacant premises at the markets but given the current position this seems highly unlikely.	Impact	6	Post-Brexit checks on some EU goods coming into Great Britain have been delayed by six months in order to give businesses more time to prepare. The government stated that the new timetable would help firms recovering in the wake of the Covid-19 pandemic. On 11 March 2021, the government announced a new timetable for border checks with full processes for some imports not required until January 2022. • Pre-notification requirements for Products of Animal Origin (POAO) and certain animal by-products (ABP) will be required from 1 October 2021. • Full checks and import declarations will now commence in January 2022. The current situation and circumstances are under regular and constant review and the risk will be reviewed and amended appropriately as time progresses. 26 Aug 2021	Impact	2	31-Jan- 2022	Constant

Action no	Action description			Latest Note Date	Due Date
MCP-SM 011a		A loading bay review meeting is planned for 2 September 2021 between the Superintendent, Tenants' Association and the local projects directorate, to discuss current loading bay suspensions around the Market. The utilisation of the bays will be discussed as well as any mitigation measures that can be put in place prior to the Christmas trading period and Brexit outcomes pending the introduction of further border checks in the new year. Any mitigation measures proposed will need consultation and potential approval from the CoL Highways Service (DBE).	Mark Sherlock	23-Aug- 2021	31-Jan- 2022
MCP-SM 011b	Reschedule working hours for market staff to cover possible extended trading hours.	Staffing levels and flexibility will be reviewed prior to the pending full import checks and resource plans amended depending upon advance impact information advised through CoL Brexit briefing groups or trader feedback. Partial import checks will come into effect on 1 October 2021, therefore this action will be maintained up to and just after this date dependent upon outcome. It may be necessary to invoke a leave moratorium in January 2022 dependent upon October outcomes and relevant information closer to the end of the year.	Mark Sherlock	U	31-Jan- 2022
MCP-SM 011c	Extend parking permissible on-street parking periods. Be prepared to be flexible in response to demand possibly up to 1pm each day.	8	Mark Sherlock	23-Aug- 2021	31-Jan- 2022

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/Risk Approach	Current Risk score change indicator
MCP-BG 003 Brexit – Impact of Brexit on tenants	Cause: The outcome of Brexit negotiations between UK Government and EU fails to secure continuity of contracts and/or security of supply chains. Event: Market tenants fail to prepare appropriately. Impact: Delays and disruption in the food supply chain create shortages of product over a sustained period placing businesses under threat of viability, with small risk of failure and vacant market premises.	Impact	4	Currently consulting with LFMA, tenants and industry bodies on impact of the new import and export rules to ensure business preparedness. • Pre-notification requirements for Products of Animal Origin (POAO) and certain animal by-products (ABP) will be required from 1 October 2021. • Full checks and import declarations will now commence in January 2022. The current situation and circumstances are under regular and constant review and the risk will be reviewed and amended appropriately as time progresses. 26 Aug 2021	Impact	1	31-Jan- 2022	Constant

Action no	Action description		Latest Note Date	Due Date
	impact of the new import and export rules to ensure		- 0	31-Jan- 2022

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/Risk Approach	Current Risk score change indicator
MCP-NS 004 Brexit - Impact of Brexit on tenants 23-Dec-2020 Emma Beard; Debbie Howard	Cause: The outcome of Brexit negotiations between the UK government and the EU fails to secure continuity of contracts and/or security of supply chains. Event: The market tenants fail to prepare appropriately for the end of the Brexit transition period on 31 December 2020. Uncertainty around the potential outcomes until it is too late to react. Effect: Delays and disruption in the food supply chain, and shortages of product over a prolonged period. There is also a risk, albeit unlikely, that this could impact the financial viability of some tenants' businesses. This in turn could lead to business failures and vacant premises at the markets but given the current position this seems highly unlikely.			The outcome of the trade agreement between the UK government and the EU had a minor adverse effect on the supply chain of goods into the market. However, normal deliveries have since resumed. Implementation of the new border checks has now been delayed. Currently there appears to have been no visible effect on trade. The availability of parking for delivery vehicles and waiting times for unloading may cause disruption to parking and unloading operations. These operations are being reviewed as part of the HGV management plan. 20 Aug 2021	Impact	2	01-Jan- 2022	Constant

Action no	Action description		Latest Note Date	Due Date
MCP-NS-004a		The HGV area at the rear of the market hall has been enlarged and further areas at the sides of the market hall are being considered. This remains under review as part of the Traffic Management Plan.	20-Aug- 2021	01-Jan- 2022
MCP-NS-004b	Consult with the New Spitalfields Market Tenants' Association (SpMTA) to agree parking charges.	Consultation with the SpMTA is ongoing.	20-Aug- 2021	01-Jan- 2022

	Consultation with the SpMTA will continue until the impact, if any, of the new import rules on		01-Jan- 2022
			01-Jan- 2022
	Costs have been obtained to remove concrete plinths at the ends of the market pavilion to provide additional parking. The estimated costs have shown to be prohibitive and alternative options will be discussed.		

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/Risk Approach	Current Risk score change indicator
MCP-SM 013 EPA Canopy Failure 17-Aug-2020 Mark Sherlock	Cause: Lack of condition survey and maintenance. Event: Sections of concrete canopy fail and collapse following extreme weather. Effect: Serious harm to building occupiers and members of the public by exposure to various physical hazards. Loss of use of physical assets through accident investigations and enforcement authority prohibitions, etc. Financial losses through potential Health and Safety Executive (HSE) fees for intervention, prosecution, civil claims and reputational damage to the City.	Tikelihood Impact	All safety and maintenance work has been completed in order to reopen East Poultry Ave and commence safe trading. Further rectification work will be identified by a wider condition survey. When we have sight of the initial findings of the wider condition surveys it is intended that any further work will be carried out as quickly as possible, noting the listed facade. 23 Aug 2021	Impact 2	31-Dec- 2021	Constant

Action no	Action description			Latest Note Date	Due Date
	and West Poultry Avenue. Erect crash mats and support props to secure remaining structure.	All safety and maintenance work has been completed in order to reopen East Poultry Ave and commence safe trading. Further rectification work will be identified by a wider condition survey. When we have sight of the initial findings of the wider condition surveys it is intended that any further work will be carried out as quickly as possible, noting the listed facade.	Sherlock	- 0	31-Dec- 2021

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Scor	e Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Current Risk score change indicator
MCP-SM 014 Glass Canopy Failure 07-Oct-2020 Mark Sherlock	Cause: Spontaneous failure of overhead glazing panel. Event: Failure of the toughened glass overhead canopy panel/s. Effect: Lacerations, fractures and/or impact injuries to pedestrians who may be showered with glass fragments.	Impact 4	Any further works to the remaining elevations are now under consideration by City Surveyor's Department (CSD) as part of the building condition audits and contractor recommendations. Funding sources and approval routes are now in progress. 23 Aug 2021	Impact 1	31-Dec- 2021	Constant

Action no	Action description		Latest Note Date	Due Date
	agreed for safe return of glass canopy to operational uses.	Any further works to the remaining elevations are now under consideration by CSD as part of the building condition audits and contractor recommendations. Funding sources and approval routes are now in progress.	 - 0	31-Dec- 2021

Risk no, title, creation date, owner	tisk Description (Cause, Event, Impact)	Current Risk Rating & Sc	core	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Current Risk score change indicator
Wholesale Markets Consolidation Project to win He un de ma efi 17-Mar-2020 Ben Milligan Th Sr Ba ini an Ef Th ex ma pu in' Re to wo cla ea Sh or to	Cause: The Markets Co-location Project (MCP) team are leading a roject to move the City's Wholesale Markets to a single inte in Barking & Dagenham. This proposed move may influence decisions on maintenance at the existing markets of ensure resources are not invested in works whose life will exceed the anticipated occupation of the respective market site. However, should the City of London Corporation be mable to, or decide not to, complete the MCP or etermines an alternative use for the Barking site, the markets may not move and this could have an injurious effect on the continued operation of the markets on their existing sites. Event: The City's three wholesale food markets, New Spitalfields, whithfield and Billingsgate are unable relocate to the Barking site and find themselves with seriously dilapidated infrastructure due to the investment decisions taken in inticipation of the proposed move to the Barking site. Effect: This could result in a major programme of works at the existing markets sites to catch up with the deferred maintenance in order to ensure the markets are fit for surpose. This could require significant additional capital exestment. The leationships with tenants may be adversely affected due to the impact on normal operation of the refurbishment works, which could result in adverse publicity, possibly eading to reputational damage to the City and tenant claims against City of London Corporation for loss of arnings and other incurred costs should the capital investment required be cost prohibitive, or the impact of the refurbishment cause severe disruption to tenants' businesses, this could trigger a decline in the markets, possibly to the point where they are irrecoverable.	Impact		Survey reports have been received from the City Surveyor's Department (CSD and further site visits have taken place with the consultants who are advising CoL on the practical solutions to the initial recommendations made on the survey reports. Meetings have taken place with CSD to agree works and funding priorities, CSD are now drafting initial Project Initiation Documents for review and submission for funding approvals. 24 Aug 2021	Impact 4	Reduce	Constant

Action no	Action description	Latest Note		Latest Note Date	Due Date
MCP-WM 001a	Keep risk under regular review	j		24-Aug- 2021	31-Dec- 2026
	Agree and implement a maintenance strategy to ensure there are appropriate levels of maintenance such that the markets will not be forced to close due to failing infrastructure.	The interim maintenance strategy will ensure that appropriate levels of maintenance continue to be carried out until there is more certainty about the markets' move. This will address the risk that the markets cannot operate due to failing infrastructure in the short to medium term. Survey reports have been received and action taken to agree priorities and obtain funding. The City will continue to ensure it meets its lease commitments with regard to maintenance through a combination of local maintenance teams and the City Surveyor's Facilities Management Team. The Cyclical Works Programme and major project works will also continue as normal at the markets, subject to the terms of the interim maintenance strategy.	Ben Milligan	24-Aug- 2021	31-Dec- 2026

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating &	& Score	Risk Update and date of update	Target Risk Rating & S	Score	Target Date/Risk Approach	Current Risk score change indicator
CVD19 SGPS 03 Wholesale Markets (M&CP)	Cause: The spread of COVID-19 continues to escalate affecting staff, businesses and stakeholders. Event: Trading at the markets reduces to a point where businesses will begin to close, either temporarily or cease trading permanently. Absence levels of CoL staff increase to a point where we are unable to provide critical services. This includes maintaining regulatory compliance Effect: The spread of COVID-19 impacts on the City's ability to safely operate the three wholesale food markets leading to partial or full closure which may lead to permanent business closures and affect the future viability of the markets. Reputational damage to the City and public health risks may be realised due to overcrowding and failure of market users to follow COVID-Secure guidance. The City may also be unable to recover debts if businesses are not sufficiently able to mitigate the threat of coronavirus to enable them to reopen post lockdown.	Impact	4	Trading is currently at a steady state. We are working with relevant local authorities to ensure COVID-Secure guidelines are followed. We are continuously monitoring staff availability particularly in light of the most recent government advice and guidance. The current risk score has been reduced to target but we will continue to monitor the ongoing situation. 26 Aug 2021	Impact	4	01-Jan-2022	Decreasing

Action no, Title,	Action description		Action owner	Latest Note Date	Due Date
		Standard Operating Procedures at all three markets will continue to be updated to reflect government advice and guidance.	Ben Milligan	26-Aug- 2021	01-Jan-2022
03c Market	1 1 2	relevant local authorities to ensure market users follow recommended guidelines.	Ben Milligan	26-Aug- 2021	01-Jan-2022