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| Committee(s): Police: Resource Risk and Estates Committee Police Authority Board | Dated: 5 September 2022 27 September 2022 |
| Subject: City of London Police Risk Register Update | Public |
| Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly? | 1 |
| Does this proposal require extra revenue and/or capital spending? | N/A |
| 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: Commissioner of Police Pol 64-22 | For Information |
| Report author: Paul Adams, Strategic Development | |

Summary

This report provides members with the current position of the refreshed risk profile highlighting the risks against the achievement of the Policing Plan objectives.

The Force risk register is now managed using the Pentana risk system used by the City of London Corporation and the Force risks have been placed within this system so that they are presented in the same format as other areas within the Corporation. This report shows, for the first time, the Force risks reported within this format.

Recommendation(s)

Members are asked to note the report.

Main Report

Background

1. In accordance with the City of London Corporation's responsibilities as a Police Authority, it is appropriate that this Committee is made aware of critical risks, which may impact on service delivery or performance, together with any plans to eliminate or mitigate critical risks, and the changing risk profile of the Force.
2. The Force risk register continues to be monitored at Chief Officer level. Each month the Chief Officer Team meeting receives an update from the Audit & Assurance Board. This board is chaired by Assistant Commissioner Betts and reviews the Force risk profile monthly. A supporting cascade of risk registers at strategic board level and business area are being refreshed to align to the new risk profile and will be used to support the management of the Force strategic risk register.

3. At the Police Authority Board in February 2022, the Police Authority presented their risk register. It was noted that this should be aligned with the Force's albeit there needed to be separation as mitigations by the Authority may necessarily need to be different to those of the Force. It was also requested at the Resource Risk and Estates Committee in February 2022 for the Risk Register updates to be in the public section of the meeting in future. It was noted that this would require some elements previously presented to be redacted, as such there is limited detail on the mitigations and management of some of the operational risks within this update.

Current Position

4. As aforementioned, AC Betts chairs a monthly Audit & Assurance meeting which oversees the Force risk profile. This has met since March 2022. It has aligned the Force risks with the new Policing Plan structure with the input of senior managers.
5. The last Audit & Assurance meeting was held on the 16th August where the Force risk profile was reviewed and updated. The results of this meeting are presented for oversight to Members within this report.

Changes to Risk Scoring Matrix

6. As stated within the last update, Members will be aware that the Force previously operated its own risk scoring system based on a 4x4x4 matrix (Impact, likelihood & Control Scoring) used by other Police Forces. In order to align the Force risk register with the Police Authority Board risk profile the Force has adopted the matrix used by the City of London Corporation as Police Authority, this will score risks using Impact and Likelihood only.
7. Due to the nature of policing, there will be some risks where mitigations by the Force will not influence impact and likelihood assessments. Previously, the Force had been able to show how these were being managed by considering the maturity of controls. Now the assessment of risk has aligned with the City of London Corporation format, there may be a number of risks shown as amber or red that would have previously been shown as green due to Force control assessments being considered.

Force Risk Register Structure

8. The Force risk register is now split into two sections along Organisational and Operational areas in support of the 6 priorities within the new Policing Plan 2022-25.
 - Organisational Risk Areas
 - Our People
 - Our Resources
 - Efficiency & Effectiveness
 - Operational Risk Areas
 - Keep People who live, work and visit the City Safe and feeling safe
 - Protect the UK from the threat of Economic & Cyber Crime
 - Putting the victim at the heart of everything we do

9. The current risks within each area are detailed within the following tables for Members' reference.

| Ref | Organisational Risks | Associated Organisational Priority | Owner | Impact | Likelihood | Score | Traffic Light | Trend | Target Impact | Target Likelihood | Target Score | Target Traffic Light |
|--------------------|---|------------------------------------|--------------|---------|------------|-------|---------------|-------|---------------|-------------------|--------------|----------------------|
| CoLP ORG 01 | Failure to ensure we recruit & retain sufficient staff to meet uplift numbers both locally & fraud uplift with the right skills and to meet our diversity ambitions | Our People | AC OPS (COO) | Major | Possible | 12 | AMBER | ➔ | Major | Possible | 12 | AMBER |
| CoLP ORG 02 | Impact of maintaining Force vacancy factor on police staff workload and morale | Our People | AC OPS (COO) | Serious | Possible | 6 | AMBER | ➔ | Serious | Possible | 6 | AMBER |
| CoLP ORG 03 | Force lacks experienced officers due to uplift number and retirement of experienced officers due to changes in pay and conditions | Our People | AC Ops | Serious | Possible | 6 | AMBER | ➔ | Serious | Possible | 6 | AMBER |

| Ref | Organisational Risks | Associated Organisational Priority | Owner | Impact | Likelihood | Score | Traffic Light | Trend | Target Impact | Target Likelihood | Target Score | Target Traffic light |
|--------------------|--|------------------------------------|---------------------------|---------|------------|-------|---------------|-------|---------------|-------------------|--------------|----------------------|
| CoLP ORG 04 | Failure to deliver the FCCRAS Programme. | Our Resources | Service Delivery Director | Extreme | Unlikely | 16 | RED | ➔ | Extreme | Unlikely | 16 | RED |
| CoLP ORG 05 | Police Funding: Failure to maintain a balanced budget | Our Resources | CFO | Major | Possible | 12 | AMBER | ➔ | Major | Unlikely | 8 | AMBER |
| CoLP ORG 06 | Estate does not meet operational requirements | Our Resources | Commissioner | Extreme | Unlikely | 16 | RED | ➔ | Major | Unlikely | 8 | AMBER |
| CoLP ORG 07 | Failure to deliver Force Fleet Strategy to replace and maintain vehicle fleet in support of operational activities | Our Resources | Commander Ops (COO) | Serious | Unlikely | 4 | GREEN | ➔ | Serious | Unlikely | 4 | GREEN |
| CoLP ORG 08 | Failure to deliver Force ICT Strategy to replace and maintain ICT in support of operational activities | Our Resources | AC NLF | Serious | Possible | 6 | AMBER | ➔ | Serious | Possible | 6 | AMBER |

| Ref | Organisational Risks | Associated Organisational Priority | Owner | Impact | Likelihood | Score | Traffic Light | Trend | Target Impact | Target Likelihood | Target Score | Target Traffic Light |
|----------------------------|---|------------------------------------|--------------|---------|------------|-----------|---------------|-------|---------------|-------------------|--------------|----------------------|
| CoLP ORG 09 | Failure to deliver on Change Portfolio Plan | Efficiency & Effectiveness | AC NLF | Extreme | Possible | 24 | RED | ➔ | Extreme | Unlikely | 16 | RED |
| CoLP ORG 10 | Failure to implement HMICFRS Inspection and CoL Internal Audit Recommendations | Efficiency & Effectiveness | AC Ops | Major | Unlikely | 8 | AMBER | ⬇ | Major | Unlikely | 8 | AMBER |
| CoLP ORG 11 | Vulnerability of Force IT network security being compromised. Including data exfiltration, denial of service, ransomware and other malicious activity across the force network and systems that would have a direct impact on operational effectiveness and capability. | Efficiency & Effectiveness | AC NLF | Extreme | Possible | 16 | RED | ➔ | Extreme | Unlikely | 16 | RED |
| CoLP ORG 12 | Failure to deliver Target Operating Model (TOM) | Efficiency & Effectiveness | Commissioner | Serious | Possible | 6 | AMBER | ➔ | Serious | Possible | 6 | AMBER |
| CoLP ORG 13 | Loss of public confidence in professionalism and trust with Force | Efficiency & Effectiveness | AC Ops | Major | Possible | 12 | AMBER | ➔ | Major | Unlikely | 8 | AMBER |

| Ref | Operational Risks | Associated Policing Plan Priority | Owner | Impact | Likelihood | Score | Traffic Light | Trend | Target Impact | Target Likelihood | Target Score | Target Traffic Light |
|------------|--|--|---------------------|---------|------------|-------|---------------|-------|---------------|-------------------|--------------|----------------------|
| CoLP OP 01 | Realisation of a Terrorist Event with inadequate Force response | Keep people who live, work and visit the City Safe | Commander Ops | Major | Unlikely | 8 | AMBER | ↓ | Major | Unlikely | 8 | AMBER |
| CoLP OP 02 | Failure to respond to Organised Crime Group (OCG) activity | Keep people who live, work and visit the City Safe | Commander Ops & NLF | Serious | Unlikely | 4 | GREEN | → | Serious | Unlikely | 4 | GREEN |
| CoLP OP 03 | Failure to contain a public order event | Keep people who live, work and visit the City Safe | Commander Ops | Serious | Unlikely | 4 | GREEN | → | Serious | Unlikely | 4 | GREEN |
| CoLP OP 04 | Inadequate response to a Civil Emergency | Keep people who live, work and visit the City Safe | Commander Ops | Serious | Unlikely | 4 | GREEN | → | Serious | Unlikely | 4 | GREEN |
| CoLP OP 05 | Failure to respond to Child Sexual Exploitation (CSE) within City | Keep people who live, work and visit the City Safe | Commander Ops | Serious | Unlikely | 4 | GREEN | → | Serious | Unlikely | 4 | GREEN |
| CoLP OP 06 | Rise in Violent Crime | Keep people who live, work and visit the City Safe | Commander Ops | Major | Likely | 16 | RED | ↑ | Serious | Unlikely | 4 | GREEN |
| CoLP OP 07 | Rise in Acquisitive Crime | Keep people who live, work and visit the City Safe | Commander Ops | Major | Likely | 16 | RED | ↑ | Serious | Unlikely | 4 | GREEN |
| CoLP OP 08 | Lack of resilience in Force Control room hinders ability to respond | Keep people who live, work and visit the City Safe | Commander Ops | Serious | Unlikely | 4 | GREEN | → | Serious | Unlikely | 4 | GREEN |
| CoLP OP 09 | Lack of capacity and skills officers' hinders ability to investigate homicides | Keep people who live, work and visit the City Safe | Commander Ops | Serious | Possible | 6 | AMBER | → | Serious | Unlikely | 4 | GREEN |

| Ref | Operational Risks | Associated Policing Plan Priority | Owner | Impact | Likelihood | Score | Traffic Light | Trend | Target Impact | Target Likelihood | Target Score | Target Traffic Light |
|------------|--|--|---------------------------|---------|------------|-------|---------------|-------|---------------|-------------------|--------------|----------------------|
| CoLP OP 10 | Force Cyber Crime Unit ability to respond to a Cyber Threat impacting City businesses or residents | Protect the UK from the threat of Economic & Cyber Crime | Commander NLF | Serious | Possible | 6 | AMBER | ➔ | Serious | Possible | 6 | AMBER |
| CoLP OP 11 | Failure of performance as National Lead Force | Protect the UK from the threat of Economic & Cyber Crime | Commander NLF | Extreme | Unlikely | 16 | RED | ➔ | Extreme | Unlikely | 16 | RED |
| CoLP OP 12 | Failure to utilise Action Fraud reports and Intelligence | Protect the UK from the threat of Economic & Cyber Crime | Commander NLF | Major | Unlikely | 8 | AMBER | ➔ | Major | Unlikely | 8 | AMBER |
| CoLP OP 13 | Failure to maintain existing services within Action Fraud System | Protect the UK from the threat of Economic & Cyber Crime | Service Delivery Director | Major | Unlikely | 8 | AMBER | ➔ | Major | Unlikely | 8 | AMBER |
| CoLP OP 14 | Failure of High profile/risk Investigation | Protect the UK from the threat of Economic & Cyber Crime | Commander NLF | Serious | Unlikely | 4 | GREEN | ➔ | Serious | Unlikely | 4 | GREEN |
| CoLP OP 15 | Failure to tackle OCGs operating within the City/Nationally committing economic and/or cyber crime | Protect the UK from the threat of Economic & Cyber Crime | Commander NLF | Serious | Unlikely | 4 | GREEN | ➔ | Serious | Unlikely | 4 | GREEN |

| Ref | Operational Risks | Associated Policing Plan Priority | Owner | Impact | Likelihood | Score | Traffic Light | Trend | Target Impact | Target Likelihood | Target Score | Target Traffic Light |
|-------------------|--|---|---------------------|---------|------------|-------|---------------|-------|---------------|-------------------|--------------|----------------------|
| CoLP OP 16 | Drop in victim satisfaction with services delivered by the Force | Putting the victim at the heart of everything we do | Commander Ops & NLF | Serious | Possible | 6 | AMBER | ➔ | Serious | Possible | 6 | AMBER |
| CoLP OP 17 | Force positive outcome rate for all crime decreases | Putting the victim at the heart of everything we do | Commander Ops | Serious | Possible | 6 | AMBER | ➔ | Serious | Possible | 6 | AMBER |
| CoLP OP 18 | Force is not able to provide the services required to look after vulnerable victims | Putting the victim at the heart of everything we do | Commander Ops & NLF | Major | Unlikely | 8 | AMBER | ➔ | Major | Unlikely | 8 | AMBER |
| CoLP OP 19 | Force unable to respond to victims within City within adequate timescale due to failure in process | Putting the victim at the heart of everything we do | Commander Ops | Serious | Possible | 6 | AMBER | ➔ | Serious | Possible | 6 | AMBER |
| CoLP OP 20 | ECVCU unable to deliver requisite services | Putting the victim at the heart of everything we do | Commander NLF | Serious | Possible | 6 | AMBER | ➔ | Serious | Possible | 6 | AMBER |

Changes to Risk Profile Since Last Update

10. Since the last update to Members the following amendments have been made to the risk scoring:
 - 1) **Failure to ensure we recruit & retain sufficient staff to meet uplift numbers both locally & fraud uplift with the right skills and to meet our diversity ambitions:** This risk was raised to red reflecting the payment being made to officers joining the MPS and the impact this might have on recruitment and retention within Force and the ability to meet uplift numbers through retaining existing staff. It has since been re-assessed as Amber as the Force met its August intake numbers for recruits.
 - 2) **Failure to implement to HMICFRS Inspection and CoL Internal Audit Recommendations:** The assessment of this risk has reduced to target score due to progress made by the Force to implement recommendations. This has reduced the score from 12 to 8.
 - 3) **Realisation of a Terrorist Event with inadequate Force response:** This risk was re-assessed internally by the Specialist Operations Business Area looking at the controls in place to mitigate against this risk. As a result, this has been re-assessed as Amber, or target score has also been re-assessed and set at this new level for the Force to maintain.
 - 4) **Rise in Violent Crime:** Following our July Performance Board and the review of the Crime statistics this risk was raised to Red to reflect the current rise in crime trends within the City. Actions are being put into place within Force tasking to address crime hotspots and action the factors contributing to the rise in the City as the City returns to pre-Covid levels of activity.
 - 5) **Rise in Acquisitive Crime:** As above.
11. The two crime risks are being monitored and may be actioned going forward as issues should the Force be unable to influence the crime trends in the short to medium term. Our Policing Plan performance update contains specific information on the rise in crime and trends that are being actioned in a bid to mitigate these risks.
12. Appendix 2 for this paper contains the risk reports for the Force risks listed on the Pentana system. ***A number of actions have been implemented and logged against each risk and closed. Only actions that remain open are shown as part of the update report.*** A complete log of actions is available within the Pentana system should members require oversight of this for future reference.

Risk Of Concern

13. Based on this profile there are two risks of concern that the Force is seeking to mitigate: these are:

- **Rise in Violent Crime**
- **Rise in Acquisitive Crime**

14. The Force is putting into place action plans to address the rise in criminality and is monitoring the impact these have on crime rates.

Conclusion

15. The risk profile of the Force is continually reviewed and updated within Force to ensure it remains relevant. The Police Authority is kept informed of the Force Risk Profile as part quarterly update schedule to ensure they are briefed of new and emerging risks and any significant change in existing risk scores as part of the Force's assessment of its own risk profile.

Appendices

- Appendix 1 – Risk Scoring Criteria
- Non Public Appendix 2 – Pentana Risk Reports for Operational and Organisational risks

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Appendix 1: Risk Scoring Criteria

(A) Likelihood criteria

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

(B) Impact criteria

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

(C) Risk scoring grid

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

(D) Risk score definitions

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

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

Contact the Corporate Risk Advisor for further information. Ext 1297

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