## **City of London Corporation Committee Report**

Committee(s):	Dated:
Projects and Procurement Sub Committee	19/05/2025
Subject:	Public report:
Commercial, Change & Portfolio Delivery Risk Register	For Information
Update	1 of information
This proposal:	Enables All
delivers Corporate Plan 2024-29 outcomes	
provides statutory duties	
provides business enabling functions	
Does this proposal require extra revenue and/or	No
capital spending?	
If so, how much?	£
What is the source of Funding?	n/a
Has this Funding Source been agreed with the	n/a
Chamberlain's Department?	
Report of:	Caroline Al-Beyerty,
	Chamberlain
Report author:	Leah Woodlock,
	Chamberlain's Department

# **Summary**

This report provides an update on the risk management activities within the Commercial, Change & Portfolio Delivery (CCPD) Division of the Chamberlain's Department. The report notes that the CCPD Division has one AMBER Corporate Risk related to Major Capital Schemes and five service-level risks, all of which are regularly reviewed and managed. This report is presented quarterly to keep the Project and Procurement Sub-Committee informed of current and emerging risks.

# Recommendation(s)

Members are asked to:

Note the report.

# **Main Report**

# Background

The Risk Management Framework of the City of London Corporation mandates that each Chief Officer regularly reports to Committee on the key risks faced in their department. The Projects and Procurement Sub-Committee will receive quarterly updates on the Commercial, Change & Portfolio Delivery Division's Risk Register.

#### **Current Position**

The Commercial, Change and Portfolio Delivery (CCPD) Division currently has **one** AMBER Corporate Risk (CR33 – Major Capital Schemes) and **five** service level risks. All of the risks are regularly reviewed, and mitigating actions are in place to prevent the realisation of these risks. A high-level summary of each of the risks are listed below:

**Corporate Risk** - CR33 Major Capital Schemes (AMBER 12), monthly monitoring of cashflow forecasting continues and is reported monthly the Chamberlain's Assurance board for scrutiny. The new Cora Project Management system went live on April 22nd, which is the first step to improved reporting and project monitoring.

**Departmental Risk** - CHB003 Inconsistent application of the internal control environment (AMBER 8), procurement governance issues are being addressed through a review of procurement regulations, development on a training programme for the team and stakeholders.

In the April Management Team meeting, emerging risks related to staff vetting delays and transformation change fatigue were identified. These risks will be monitored and added to the risk register once they are finalised.

Detail of the CCPD managed risks are included in appendix 1 of this report.

**Strategic implications** – Alignment with the Risk Management Framework, to prevent realisation of risks that would prevent the City of London Corporation delivering the Corporate Plan.

**Financial implications** – Failure to mitigate risks would increase the risk of financial losses.

**Resource implications** – None

**Legal implications** – Failure to mitigate risks would increase the risk of legal action/challenge.

**Risk implications** – as per the report.

**Equalities implications –** None.

Climate implications – None.

**Security implications** – None.

#### Conclusion

In conclusion, the CCPD Division remains committed to proactive risk management, ensuring that all identified risks are regularly reviewed and mitigated.

#### **Appendices**

Appendix 1 – CCPD Risk Register

### **Leah Woodlock**

Chamberlain's Project Manager Chamberlain's Department

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## Appendix 1 - CCPD Risk Register

# **Risk Level Description Corporate**

CR33	Т	Title	Major Capital Schemes
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#### Description

Cause: The City Corporation has set itself the ambition to deliver a portfolio of major capital schemes in a fiscally constrained environment.

Event: There is insufficient resourcing and controls in place to effectively oversee and administer the portfolio according to strategic priorities.

#### Effects:

- · Failure to deliver on corporate outcomes and strategic priorities.
- Schemes not delivered on time and therefore a delay to the realisation of benefits.
- Potential for increased capital costs as a result of delayed decision making, and ineffective oversight and controls across the portfolio.
- Inability of the organisation to move at the required pace to secure decisions.
- Reputational impact on the Corporation vis-a- vis key stakeholders across London, UK Government, and investors.
- Revenue impact of delayed delivery to services affected (e.g. Markets, Museum of London Grant, City of London Police).

Current Risk Assessment, Score & Trend Comparison	Impact	12	Constant	Target Risk Assessment & Score			8
Likelihood	Possible	Impact	Major	Likelihood	Unlikely	Impact	Major
Risk Score	12	Review Date	07-Apr-2025	Risk Score	8	Target Date	31-Mar-2029

## Latest Note

The project governance review has recommended a move to a portfolio management model which will more effectively manage the prioritisation of projects aligned to strategic objectives and the allocation of resources to enable successful delivery.

Monthly monitoring of cashflow forecasting continues and is reported to relevant committees and the Chamberlain's Assurance Board.

The new project procedure is currently being drafted and proposals tested. The final draft is due to be approved by Summer 25/26.

A change in approach to the future of the markets has resulted in the cancellation of the Markets Co-location Programme. The landlord works at the Museum of London are nearing completion and work on Salisbury Square and the Future Police Estate Programme continues to plan.

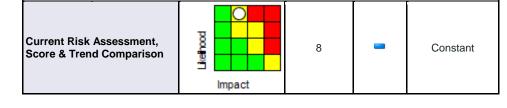
Risk Level	Corporate	Department	Chamberlain's
Creation Date	14-Feb-2020	Risk Owner	Caroline Al-Beyerty
Approach	Reduce	Risk Administrator	Leah Woodlock
Head of Profession 1	Financial Services	Risk assigned to	Genine Whitehorne
Head of Profession 2	Commercial	Committee	Finance Committee
Head of Profession 3	Programme Management	Parent Risk	CR Corporate Risk Register

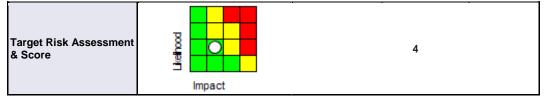
Ref No:	Action Description	Latest Note	Latest Note Date	Action Owner	Due Date
CR33h New Project Governance Approach	Implement a new project governance approach	The Town Clerk's portfolio board commenced in November 2023.  A portfolio overview report approved by Projects and Procurement sub-committee, with one-off funding approved by CoCo on 7 March, further work underway to identify permanent funding source.  A drafted project procedure and guidance is currently being reviewed by the project governance working group.  Work ongoing with project procedure, construction of gateways and scenarios. Significant level of change for departments which suggests a phased approach.  • Phase 1 – Provision of PM Toolkit and enabling portfolio reporting to Portfolio Board and Members – reporting to commence from Summer 2025  • Phase 2 – Roll out of new Gateways in the Project Procedure from September 2025  Plan to be presented and approved at Portfolio Board, PPsC (June 25), Finance Committee (July 25), and CoCo (July 25).	07-Apr-2025	Matthew Miles	31-Jul-2025
CR33j Project Management Academy	Refresh the Project Management Academy	Exploratory discussions as part of soft market testing ongoing with prospective supplier to ascertain appetite and costings for an outline training proposal in line with new project procedure and framework/ PM Academy seeking for partners to undertake Green Book training.  A vacancy in the Projects Skills and Capability Manager role is contributing pressures. However, an apprentice is being recruited to provide administrative support.	07-Apr-2025	Nadhim Ahmed	30-Sep-2025

CR33k New Project Management System	Procure and implement a new project management system	A broad programme of requirements workshops for the new Cora Project Management system completed in January 2025. Moreover, User Acceptance Testing (UAT) completed in March 2025. Identified issues are being resolved as part of system configuration.  The approach to user engagement and training is currently being implemented, with the system expected to be in use for the first Portfolio reports at end May 2025.	07-Apr-2025	Matthew Miles	31-Jul-2025
CR33I Cashflow and Forecast Monitoring	Monitor the high-level cashflow/forecast monthly	The Investment Management Monthly Meeting has been established.  The Chamberlain's Assurance Board has also been established to review the financial dashboards and forecasts for the Major Programmes, with updates provided to the Portfolio Board.  The cashflow and capital realisation strategy was presented to Finance and Investment Committees in February. Quarterly monitoring/reporting will continue going forwards,	07-Apr-2025	David Abbott	31-Mar-2029
CR33m Secure Third-Party Funding	Secure Third-Party Funding	A project update report has been prepared Finance Committee, City Bridge Foundation Board and Policy & Resources Committee on a regular basis. This will continue throughout the lifespan of the Major Programmes.	03-Dec-2024	Sonia Virdee; Paul Wilkinson	31-Mar-2029
CR33n Provide regular Member updates	Provide regular Member updates	A project update report has been prepared Projects and Procurement Sub Committee, Finance Committee, City Bridge Foundation Board and Policy & Resources Committee on a regular basis. This will continue throughout the lifespan of the Major Programmes.	03-Feb-2025	Sonia Virdee; Genine Whitehorne	31-Mar-2029

# **Risk Level Description Departmental**

Code CHB 003 Title Inconsistent application of the internal control environment Description Cause: Inconsistent application of internal controls across the City of London Corporation, including but not limited to: • Failure of staff management to adhere to financial and procurement regulations, leading to: • Poor Purchase Order Compliance · Inefficient budget management • Delays in setting up Project Codes due to governance • Ineffective contract and supplier management • Lack of management oversight of purchasing activities • Misinterpretation and inconsistent understanding of financial and procurement regulations • Inconsistent guidance from subject matter experts • Complex procedures driving officers towards using workarounds Event: Increase in transactional errors Decrease in payment performance • Impact on cashflow management and accuracy of forecasting • Heightened demand for customised approvals and urgent decisions • Diminished strategic challenge capacity • Disrupted delivery of Business as Usual (BAU) operations Effect: • Failure to achieve value for money Negative internal and external audit opinions • Detrimental effects on supplier partnerships and commercial appeal to the market





Likelihood	Likely	Impact	Serious
Risk Score	8	Review Date	26-Feb-2025

Likelihood	Unlikely	Impact	Serious
Risk Score	4	Target Date	31-Jul-2025

#### **Latest Note**

Materialising in various ways, indications are emerging of the inconsistent implementation of internal controls throughout the Corporation.

The financial leadership group, consisting of finance representatives from across the corporation and its institutions, has been appointed to mitigate the risk of inconsistent application of the internal control environment by working with business customers.

A number of mitigations have been identified to improve compliance and overall benefits of controls. FLG have been instructed to provide a list and evidence of further in-place actions to be added to the action list below.

A significant emphasis is placed on user training and understanding to ensure effective adherence to internal spending and purchasing controls.

This risk takes precedence as additional occurrences will adversely affect the ability to achieve a balanced medium-term financial plan.

Risk Level	Departmental	Department	Chamberlain's
Creation Date	28-Feb-2024	Risk Owner	Caroline Al-Beyerty
Approach	Reduce	Risk Administrator	Hayley Hajduczek; Leah Woodlock
Head of Profession 1	Commercial	Risk assigned to	Caroline Al-Beyerty
Head of Profession 2	Financial Services	Committee	Finance Committee
Head of Profession 3	Internal Audit	Parent Risk	

Ref No:	Action Description	Latest Note	Linked Actions Progress	Latest Note Date	Action Owner	Due Date
Training	courses for all users.	New starters onboarded will include system training before login is authorised.  Non-compliant users, are to repeat the training course.  Budget Manager Training has commenced since December running on a monthly basis. There will be a pause in the delivery of the training between March and April to allow all staff to focus on year end closing. We intend to ramp up the number of training sessions available by having multiple sessions per month during the summer period.		12-Feb-2025	Daniel Peattie	31-Mar-2025

CHB003b Comprehensive Chamberlain's Integrated Dashboard	Design and maintain a comprehensive Chamberlain's Integrated Financial Performance Dashboard, seamlessly linking procurement and financial data.	Continue to report to ELB and senior management teams on the payment and PO compliance by teams/departments.  Discussions are being held at the monthly finance leadership group on best practice and accountability.  Reviewing reports and adding trends to dashboard. These reports will encourage accountability at the right level.  Monthly reports are currently being shared with FLG and ELB by the Data Team	90%	03-Dec-2024	Leah Woodlock	30-Jun-2025
CHB003c Project Governance Process Review	Review gateway process and project budget code creation.	The review of the gateway process is underway as part of action CR33h  Considering the separation of capital accounting arrangements from project procured.  A draft revising is currently being socialised amongst the working group.	60%	12-Feb-2025	Matthew Miles	31-May-2025
CHB003e Review of procurement regulation	Review of procurement regulations and are explicit around requirements	First draft policy is under review by a limited group. Socialisation of the policy will be a larger working group and stakeholders in March 2025.  The Policy will be presented to Projects and Procurement Sub-Committee in May for approval.  Performance issues to be reported and dealt with by line manager, Financial Services Director and Commercial Director.  Further non-compliance to be escalated to the Chamberlain.  Monthly reviews are taking place at Financial Leadership Group to highlight any areas of concern.	50%	12-Feb-2025	Sue Smith; Genine Whitehorne	31-Jul-2025
CHB003h Escalation and enforcement of non-compliance activities	Escalation and enforcement of non- compliance activities	Performance issues to be reported and dealt with by line manager, Financial Services Director and Commercial Director.  Further non-compliance to be escalated to the Chamberlain.	40%	03-Dec-2024	Sonia Virdee; Genine Whitehorne	31-Mar-2025

		Monthly reviews are taking place at Financial Leadership Group to highlight any areas of concern.				
CHB003i Finance Leadership Group Interventions	responsible for partnering with departments and services to improve overall compliance. An	Current actions and mitigations are reviewed and discussed at the month Finance Leadership Group. The performance of departments and institutions are reviewed monthly, with finance reps sharing their best practice on reducing noncompliance.	20%	12-Feb-2025	Sonia Virdee	31-Mar-2025

# Risk Level Description Service

Code	CHB CCPD 005	Title	Portfolio Delivery Lack of Capacity					
Description Lack of capacity and resilience in team affects CoL's ability to effectively manage the volume of approved projects.								

Current Risk Assessment, Score & Trend Comparison	Impact	16	•	Constant
Likelihood	Unlikely	Impact		Extreme
Risk Score	16	Review Date		26-Jan-2024

Target Risk Assessment & Score	pooley[]		12
Likelihood	Possible	Impact	Major
Risk Score	12	Target Date	30-Jun-2025

The team are carrying out the Project Governance review to ensure the CoL has the capability and capacity to deliver projects. They have also secured the interim resource to support
implementing the new Project Governance approach across the corporation.

Risk Level	Service	Department	Chamberlain's
Creation Date	17-Apr-2023	Risk Owner	Genine Whitehorne
Approach	Reduce	Risk Administrator	Tom Gillings; Genine Whitehorne; Leah Woodlock
Head of Profession 1	Programme Management	Risk assigned to	Leah Woodlock
Head of Profession 2		Committee	Operational Property & Project Sub Committee
Head of Profession 3		Parent Risk	CHB PG Project Governance

Ref No:	Action Description	Latest Note	Linked Actions Progress	Latest Note Date	Action Owner	Due Date
		The team are working closely with the project team to deliver the new Project Governance approach.	10%		CHB Project Governance	31-May-2024
Project Governance Team	Resource the Project Governance Team to build team capacity and workload management	Interim resources have been appointed to support the delivery of key projects.	10%		CHB Project Governance	31-May-2024

	Code CHB CCPD 002			Title	Supplier Management			
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#### Description

Cause: The supplier management process is currently facing several challenges. Firstly, there is poor data and self-reporting on supplier performance, which makes it difficult to accurately assess and manage supplier capabilities. There is an increased legal and compliance risks due to reliance on supplier T&C's rather than city terms, which may not adequately protect the city's interests

Additionally, there is a lack of engagement with small and medium enterprises (SMEs), which means that a significant portion of the market is excluded from COL commercial activities and opportunities. Furthermore, departments are undertaking pre-market engagement without commercial support or guidance, which is essential for compliance purposes. This lack of oversight can lead to non-compliance with regulations and standards. There is also an omission of key performance indicator (KPI) reporting and contract management, which are critical for monitoring and ensuring supplier performance. Lastly, having incorrect contact details further complicates communication and coordination with suppliers, leading to potential misunderstandings and delays.

**Event:** is unable to effectively manage its suppliers due to several underlying issues.

Effect: The effect of this supplier management risk is multifaceted and can have significant consequences for the Corporation. Increased legal and compliance risks arise from relying on supplier terms and conditions (T&C's) rather than city terms, which may not adequately protect the city's interests. Not adhering to the Procurement Code can lead to market manipulation, resulting in unfair competition and ineffective market engagement, causing missed opportunities or incorrect supplier selection. Additionally, there is a heightened risk of supplier failure, which can disrupt service or product delivery. Financial losses are also a concern due to poor contract management and inappropriate awarding. Furthermore, the Corporation's reputation may suffer due to perceived or actual mismanagement, leading to reputational damage and heightened risk. Overall, these effects can undermine the Corporation's ability to effectively manage its suppliers and achieve its strategic objectives.

Current Risk Assessment, Score & Trend Comparison	pool	12	•	Increasing
Likelihood	Possible	Impact		Major
Risk Score	12	Review Date		31-Dec-2024

Target Risk Assessment & Score	Impact		4
Likelihood	Unlikely	Impact	Serious
Risk Score	4	Target Date	31-Mar-2025

#### Latest Note

Risk Level	Service	Department	Chamberlain's
Creation Date	09-Jan-2025	Risk Owner	COO Commercial Operations
Approach	Reduce	Risk Administrator	Tom Gillings; Leah Woodlock
Head of Profession 1	Commercial	Risk assigned to	Chamberlain
Head of Profession 2	Financial Services	Committee	Operational Property & Project Sub Committee
Head of Profession 3	Legal	Parent Risk	

F	Ref No:	Action Description	Latest Note	Linked Actions Progress	Latest Note Date Action Owner	Due Date	ı
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	Establish a comprehensive system for collecting and analysing supplier performance data	Establish a comprehensive system for collecting and analysing supplier performance data. This system should include regular self-reporting by suppliers, as well as independent audits and assessments. By having accurate and up-to-date performance data, the organization can make informed decisions and address any issues promptly.	0%	Aga Watt	30-Sep-2025
CHB CCPD 002b Enhance SME Engagement	Engage actively with SMEs	Actively involve small and medium enterprises (SMEs) in the supplier management process. This can be achieved by creating forums for SMEs to share their insights and expertise, as well as providing training and support to help them meet the Corporation's standards. Engaging SMEs will ensure that their valuable contributions are utilised, leading to better supplier management outcomes.	0%	Nish Dubey	30-Sep-2025
CHB CCPD 002c Improve Contract Management	Review the Contract Management Framework	Establish a centralized system for maintaining accurate contact details and managing contracts. This system should include regular updates and checks to ensure that contact information is correct and that key performance indicators (KPIs) are being monitored. By improving communication and contract management, the organization can enhance coordination with suppliers and ensure that performance is appropriately evaluated.	0%	Aga Watt	31-Dec-2025
CHB CCPD 002d Standardise Procedures	Standardise procedures	Develop and enforce standardized procurement procedures that align with the procurement code. These procedures should include clear guidelines for pre-market engagement, supplier selection, contract management, and performance monitoring. Ensure that all departments follow these standardized procedures to maintain consistency and compliance.	0%	Sue Smith	31-May-2025

Code	CHB CCPD 004	]	Title	Procurement Governance
Description	Cause: The Governance framework is currently being reviewed following poorly documented and understood which creates confusion and inconsist and the governance framework.  Event: The delivery of the Corporations essential services are interrupted governance to expediate purchases that undermine the Procurement Act effectiveness of the procurement governance framework and leading to defect the composition of the procurement governance framework and leading to defect the composition of the procurement governance framework and leading to defect the composition of the procurement governance framework and leading to defect the composition of the procurement governance framework and leading to defect the composition of the procurement governance framework and leading to defect the composition of the procurement governance framework and leading to defect the composition of the procurement governance framework and leading to defect the composition of the composition of the procurement governance framework and leading to defect the composition of the procurement governance framework and leading to defect the composition of the composition of the procurement governance framework and leading to defect the composition of the composition of the procurement governance framework and leading to defect the composition of the composition o		nsistencies. The current thre oted due to the inefficient gov Act leading increased legal a to decreased stakeholder sat It in legal and financial reperd	led in the Commercial review. The current governance process is confusing and scholds for procurement activities are set low which increases the burden on officers wernance processes. Customers utilise exception codes or undertake non-compliant and financial risks, procurement errors, and delays, ultimately undermining the tisfaction and potential reputational damage. cussions. Inconsistent and inefficient procurement activities can lead to delays, ir productivity and effectiveness, leading to potential burnout and decreased morale.

Current Risk Assessment, Score & Trend Comparison	Impact	12	<b>a</b>	Increasing	
Likelihood	Possible	Impact		Major	
Risk Score	12	Review Date		31-Dec-2024	

Target Risk Assessment & Score	poo <sub>gen</sub> Impact	4	
Likelihood	Unlikely	Impact	Serious
Risk Score	4	Target Date	31-Mar-2025

#### Latest Note

Risk Level	Service	Department	Chamberlain's
Creation Date	09-Jan-2025	Risk Owner	СНВ
Approach	Reduce	Risk Administrator	Tom Gillings; Leah Woodlock
Head of Profession 1	Commercial	Risk assigned to	Chamberlain
Head of Profession 2	Financial Services	Committee	Operational Property & Project Sub Committee
Head of Profession 3	Legal	Parent Risk	

Ref No:	Action Description	Latest Note	Linked Actions Progress	Latest Note Date	Action Owner	Due Date
CHB CCPD 004a		Develop and document clear governance processes and approval procedures.	0%			31-May-2025
CHB CCPD 004b	Thresholds	Conduct a review of the current procurement thresholds and consider raising them to reduce the burden on officers for governance. However, this should be accompanied by improved compliance measures to ensure that procurement activities remain within regulatory and ethical standards. Implementing automated compliance checks can help maintain adherence to the procurement code while allowing for higher thresholds.				31-May-2025
CHB CCPD 004c		Provide comprehensive training and support for internal customers to ensure they understand the procurement process and the procurement code. This can include workshops, online resources, and one-on-one support. Improving access to intranet resources and providing clear, user-friendly guidance will help internal customers adhere to the procurement code and reduce the additional efforts required to ensure compliance.	0%			31-May-2025

Code CHB CCPD 006 Title PM Lack of Knowledge

 Description
 Project managers across CoL lack of requisite knowledge and skills to effectively manage projects.

Current Risk Assessment, Score & Trend Comparison	po O Impact	12	•	Constant	
Likelihood	Possible	Impact		Major	
Risk Score	12	Review Date		17-Apr-2023	

Target Risk Assessment & Score	Score Impact		8
Likelihood	Unlikely	Impact	Major
Risk Score	8	Target Date	17-Mar-2024

Latest Note	Assessing Project Manager capability across the CoL is part of the Project Governance Review.
	The team are reviewing the Project Management Academy to re-launch it in the 23/34 financial year.
	There is SRO training to support effective project management.

Risk Level	Service	Department	Chamberlain's
Creation Date	17-Apr-2023	Risk Owner	Genine Whitehorne
Approach	Reduce	Risk Administrator	Leah Woodlock
Head of Profession 1	Financial Services	Risk assigned to	Genine Whitehorne
Head of Profession 2		Committee	Operational Property & Project Sub Committee
Head of Profession 3		Parent Risk	CHB PG Project Governance

Ref No:	Action Description	Latest Note	Linked Actions Progress	Latest Note Date	Action Owner	Due Date