Chamberlain's Corporate Risks

Code CR35		Title	Unsustainable Medium Term Finances - City Fund
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Description Causes:

Persistent high inflation, as reported and forecast by the Office for Budget Responsibility.

Aging estate crystallising high levels of expenditure over short time period, putting pressure on Reserves. Reduction in rental income from the property investment portfolio to support Major Projects programmes. Anticipated reductions in public sector funding (local government and Police), escalating demands (both revenue and capital), and an ambitious programme for major project delivery pose a threat to sustaining the Square Mile's vibrancy and growth. The Police Transform program fails to achieve anticipated budget mitigations outlined in the MTFP.

Event: The failure to manage financial pressures within the fiscal year and achieve a sustainable savings programme, or to boost income generation to address the Corporation's projected medium-term financial deficit.

Effect: Inability to establish a balanced budget, which is a statutory requirement for the City Fund. The City of London Corporation's reputation could suffer due to failure to meet financial objectives or the necessity to curtail services provided to businesses and the community.

Challenges in executing the capital program and major projects within affordable limits.

Current Risk Assessment, Score & Trend Comparison	px p	16	a	Increasing
Likelihood	Likely	Impact		Major
Risk Score	16	Review Date	е	12-May-2025

Target Risk Assessment & Score	Impact	8	
Likelihood	Unlikely	Impact	Major
Risk Score	8	Target Date	31-Mar-2026

Latest Note

The 2025/26 budget and medium term financial plan has been updated. The Final Local Government Settlement has confirmed the business rates reset, which moves the risk rating from Amber to Red. Inflation rates to be monitored quarterly and an inflation contingency to be maintained in 2025/26 through carried forward from 2024/25 underspends. Pressures on adult social care, children services, security and policing continue and are addressed through increase in taxes and business rates premium.

Other on-going pressures totalling £0.4m, plus net 2% inflation uplift approved in 2025/26 local risk budgets. The medium-term financial plan includes:

- Reprofiling of cyclical works programme to cover bow-wave of outstanding works and provision for works going forward.
- Funding strategy identifies where best to bring third party capital into surplus operational property opportunities, reducing demand on own Reserves.
- Quarterly monitoring of capital programme against budgets.
- Securing income generation opportunities.
- Developing a savings programme aligned with the Town Clerk's Fantastic Five Years, supporting organisational excellence, focusing on efficiencies and transformation across services.

Risk Level	Corporate	Department	Chamberlain's
Creation Date	19-Jun-2020	Risk Owner	Caroline Al-Beyerty
Approach	Reduce	Risk Administrator	Leah Woodlock
Head of Profession 1	Financial Services	Risk assigned to	Sonia Virdee
Head of Profession 2		Committee	Finance Committee
Head of Profession 3		Parent Risk	CR Corporate Risk Register

Ref No:	Action Description	II atast nata	Latest Note Date	Action Owner	Due Date
CR35a Impact of inflation		Regular monitoring the office of budget responsibility's inflation forecasts, The Consumer Prices Index (CPI) rose by 3.5% in the 12 months to April 2025, up from 2.6% in the 12 months to March. Identify areas that are forecasting to exceed budget envelope due to inflation increases.	09-Jun-2025	lain Jenkins	31-Mar- 2026
CR35c Major Projects	Remain within the financial envelopes approved for major projects.	Monthly update on major projects forecasts and issues arising. Major projects are presented monthly to the Chamberlain's Assurance Board with an update to the Portfolio Board chaired by the Town Clerk/Chief Executive. Regular reporting to Capital Buildings Board, Finance Committee, and Policy and Resources Committee. All projects are currently forecast to be completed within budget, although there are quite significant risks to funding and costs, which will continue to be reviewed, particularly relating to SSD/FPEP.	09-Jun-2025	David Abbott	31-Mar- 2029
CR35f Achievement of current Savings Programme	Delivering the current savings programme and securing permanent year-on-year savings (including Police Authority) • Develop income generation opportunities	Court of Common Council, in March 2025 reaffirmed the profiling of remaining fundamental review savings. Ensure income generation schemes are sustainable and on-going opportunities are explored, these include but not limited to events across the Corporation, Advertising and sponsorship, Filming inside and outside the square mile, Retail opportunities and Fees and Charges. An Income Generation Working Party has been established to recommend direction, momentum and prioritisation on income	10-Jun-2025	Mark Paddon; Daniel Peattie; Ellie Robles	31-Mar- 2026

		generation opportunities. This coupled with 2025 Star Chamber outputs will provide a cross-corporation programme to deliver. Pressures and mitigations are being recorded at a more granular level to improve the tracking and reporting on savings during the year, this information will be incorporated into the budget monitoring reports from 2025/26 quarter 1 onwards to help inform Members of key risks and progress. An update on the savings was reviewed by the Efficiency and Performance Working Party at its June meeting. One of the outcomes was to review how we inform Committee Chairs on City Funds' overall position. This will be addressed in an informal meeting before Policy and Resource Away Day. Savings programmes/initiatives will continue to be considered during the 2025/26 financial year in line with the Town Clerk's Fantastic Five Years with the aim to deliver by April 2026. Officer Star Chambers led by the Town Clerk have commenced and will continue into September 2025, with a progress update being presented to Policy and Resources away day in July 2025 on income generation and savings across the Corporation to inform the 2026/27 budget setting work.			
CR35p Plans in place to reduce future deficits	Plans in place to reduce future deficits.	The revised medium-term financial plan is only balanced over the next five years with the use of general fund reserves and further savings and/or revenue raising by increasing Council Tax and Business Rate Premium. City Fund moves into deficit position from 2026/27 onwards. The Final Local Government Settlement confirms plans to reset the business rates retention system and plans to engage with councils about reforms to the funding system. This consultation has begun in early 2025, with implementation of these reforms starting through the multi-year Settlement in 2026/27. Future deficits should not be ignored, previously the business rate growth had been kept separate to fund the major projects and not relied on to balance the in-year position, due to increases in inflation and reductions in property income forecasts this is no longer possible. Radical decisions are now needed on how best to bring down the annual operating deficit, over and above those already identified (income generation, operational property review, investment property review), including major changes or stoppages to existing services provision and/or reduction in grants. This will require a renewed approach to transformation underpin by a clear communication plan to all members, so they are aware of the challenges ahead. The focus of the May/June Star Chamber meetings is to increase the attention on efficiencies, preventative approaches, aligning to strategic priorities as well as the current income generation strategies. A second round is due to be scheduled for September to finalise and confirm the value of proposals identified by Chief Officers.	06-Jun-2025	Daniel Peattie	31-Mar- 2026

CR38		Title	Unsustainable Medium Term Finances - City's Estate
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Description

Causes: The embedded increased impact of inflation, following the peak of 10.7% in Autumn 2022 (as reported by the Office for Budget Responsibility). Aging estate crystallising high levels of expenditure over short time period, putting pressure on Reserves.

Reduction in rental income from the property investment portfolio following post pandemic changes in workplace attendance reducing demand for grade B office accommodation.

Event: Inability to manage financial pressures within the fiscal year, resulting in an inability to achieve anticipated savings and generate expected income, may necessitate additional reliance on investment drawdowns. Additionally, challenges in controlling construction inflation or the inability to readjust capital projects within budget parameters pose further risks.

Effects: The City of London Corporation's reputation could suffer from failure to achieve financial goals or from reduced services to businesses and the community. Experience challenges in delivering the capital program and major projects within budgetary limits. Inability of expenditure to align with the corporate plan, leading to inefficient resource utilisation and reduced corporate performance.

Current Risk Assessment, Score & Trend Comparison	po O D D D D D D D D D D D D D D D D D D	12	•	Decreasing
Likelihood	Possible	Impact		Major
Risk Score	12	Review Date	9	12-May-2025

Target Risk Assessment & Score	Impact		8
Likelihood	Unlikely	Impact	Major
Risk Score	8	Target Date	31-Mar-2026

Latest Note

The 2025/26 budget and 5 and 20 year financial model has been updated. The revised position shifts the risk rating from Red to Amber.

Inflation rates to be monitored quarterly and an inflation contingency to be maintained in 2025/26 through carried forward from 2024/25 underspends. On-going pressures totalling £2.0m, plus net 2% inflation uplift approved in 2025/26 budgets.

The five-year financial plan includes reprofiling of cyclical works programme to cover bow-wave of outstanding works, plus a further provision for works going forward.

Earning more income from property investment portfolio. To this end the Investment Property Strategy was approved by Investment Committee in July 2024, and the team is currently being shaped in order to be able to deliver the strategy's objectives.

The funding strategy identifies where best to bring third-party capital, reducing demand on own Reserves.

Key mitigations include quarterly monitoring of capital programme against budgets and developing comprehensive business cases and securing and implementation plans for income generation opportunities.

	Developing a savings programme aligned with the Town Clerk's Fantastic Five Years, supporting organisational excellence, focusing on efficiencies and
	transformation across services.

Risk Level	Corporate	Department	Chamberlain's
Creation Date	31-Oct-2022	Risk Owner	Caroline Al-Beyerty
Approach	Reduce	Risk Administrator	Leah Woodlock
Head of Profession 1	Financial Services	Risk assigned to	Sonia Virdee
Head of Profession 2	ead of Profession 2 Committee		Finance Committee
Head of Profession 3		Parent Risk	CR Corporate Risk Register

Ref No:	Action Description		Latest Note Date	Action Owner	Due Date
CR38a Impact of inflation	Monitoring the impact of revenue inflationary pressures (including pressures on energy costs, cost of London living wage) and construction inflation impacts on capex programme • Monitor the use of inflation contingency	Consumer Prices Index (CPI) rose by 3.5% in the 12 months to April 2025, up from 2.6% in the 12 months to March.	09-Jun-2025	Iain Jenkins	31-Mar- 2026
CR38e A reduction in key income streams and increase in bad Debt	Monitoring key income streams • i.e. rental income from the property investment portfolio.	This is being monitored monthly, with action being taken within the portfolio to maximise income generation opportunities. Ensure income generation schemes are sustainable and on-going opportunities are explored, these include but not limited to; Lord Mayor Show and events across the Corporation, Advertising and sponsorship, Filming inside and outside the square mile, Retail opportunities and Fees and Charges. Benchmarking exercises are currently being undertaken to provide a market comparison. Officer Star Chambers led by the Town Clerk have commenced and will continue into September 2025, with a progress update presented to Policy and Resources away day in July 2025 on income stream across the Corporation.		Ellie Robles / Daniel Peattie	31-Mar- 2026

CR38f Achievement of current Savings Programme	Delivering the current savings programme and securing permanent year-on-year savings.	Quarterly revenue monitoring undertaken to ensure departments have appropriate plans in place to meet in-year pressures. High risk departments are undertaking monthly revenue monitoring. Regular updates to Executive Leadership Board / Senior Leadership built into monitoring timetable. Pressures and mitigations are being recorded at a more granular level to improve the tracking and reporting on savings during the year, this information will be incorporated into the budget monitoring reports from 2025/26 quarter 1 onwards to help inform Members of key risks and progress. An update on the savings was reviewed by the Efficiency and Performance Working Party at its June meeting. One of the outcomes was to review how we inform Committee Chairs on City Funds' overall position. This will be addressed in an informal meeting before Policy and Resource Away Day. An update on the revised 5 and 20 year financial plans were presented to the Joint RASC and Service Committee Chairman in January 2025. Which then informed the proposals taken forward and approved at Court of Common Council in March 2025. The focus of the May/June Star Chamber meetings is to increase the attention on efficiencies, preventative approaches, aligning to strategic priorities as well as the current income generation strategies. A second round is due to be scheduled for September to finalise and confirm the value of proposals identified by Chief Officers.	06-Jun-2025	Daniel Peattie	31-Mar- 2026
CR38g Major Projects Financial Envelope	Remain within the financial envelopes approved for major projects.	Monthly updates and budget monitoring on major projects forecasts and issues arising. Projects are routinely reviewed by the Chamberlain's Assurance Board. The only major project remaining within City Estate is the MoL Landlord Works, which is nearing completion, as well as the funding contribution towards SSD. The achievement of property disposals on time as well as drawdown from financial investments, will be needed to fund cashflows, which is being monitored as part of the cashflow reporting to Investment Committee.	09-Jun-2025	David Abbott	31-Mar- 2029
CR38h Third Party Capital Funding	Bringing third party capital to surplus operational property opportunities.	Identified initial opportunities which have been supported by Resource Allocation Sub Committee. Now that decision on markets has been made, remaining proposals for each opportunity has been worked through by the Chamberlain's and City Surveyor's	16-Jun-2025	Sonia Virdee; Robert Murphy	31-Mar- 2025

		teams and was submitted for member consideration to the Investment Committee in February. Progress will be updated to the Investment Committee on a quarterly basis.			
CR38i Charities Review (Natural Environment)	Undertake the Charities Review (Natural Environment)	The ability for charities to fundraise and generate more income to support ambitions for activities and operational property requirements. Finance Committee on 14 January, agreed to proceed with the implementation phase and move to a grant funding model for 2025/26. This was confirmed by RASC and P&R in February 2025. The two-year implementation phase commenced in April 2025 and will report progress to NE Committees in 2025 and interim outcomes to the Finance Committee in December 2025 with further reporting in 2026.	09-Jun-2025	Emily Brennan; Pauline Mouskis	31-Mar- 2025
CR38j Plans in place to reduce future deficits.	Reduce annual operating deficit, including major changes or stoppages to existing services provision and/or reduction in grants.	Despite the Court of Common Council decision on the markets, City's Estate continues to produce annual operating deficits over the 5-year financial plan. Over the planning period, the revised cumulative deficit is forecast to be £395m in additional to the financial gain already modelled. Balance sheet modelling indicates this is manageable in the medium term. Stopping the markets co-location programme has strengthened net assets, supporting the sustainability of the City's Estate fund and investment portfolio. This will in turn allow the Corporation to progress with implementing the investment strategy in diversifying its investment assets, which according to longer term modelling, suggests recovery and a transition into surplus in 15 years. Implementing these decisions shifts the risk dial from red to amber. However, Members should note failure to implement the investment strategy will compromise the recovery of City's Estate's I&E position. Therefore, it is not recommended to add any additional pressure on City's Estate investment assets to allow time for the strategy to be embedded. Additionally, continued emphasis on efficiencies and reducing deficit funding for charities will require support and progress to ensure the sustainability and future viability of both Charities and City's Estate. Star Chambers led by the Town Clerk have commenced and will continue into June 2025. The focus of the Star Chamber meetings is to increase the attention on efficiencies, preventative approaches, aligning to strategic priorities as well as the current income generation strategies. A second round is due to be scheduled for	06-Jun-2025	Daniel Peattie	31-Mar- 2025

September to finalise and confirm the value of proposals identified by Chief Officers.		
An update is being presented to Policy and Resources away day in July 2025 on income generation and savings across the Corporation to inform the 2026/27 budget setting work		

Code	CR33	Title	Major Capital Schemes	
Description	Cause: The City Corporation has set it	self the ambition to deliver a portfolio o	of major capital schemes in a fiscally constrained environment.	
	Event: There is insufficient resourcing	and controls in place to effectively over	rsee 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
Likelihood	Possible	Impact		Major
Risk Score	12	Review Date	е	10-Jun-2025

Target Risk Assessment & Score	Impact	8	
Likelihood	Unlikely	Impact	Major
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 (P3 Framework) is in draft form having been endorsed by the Town Clerk's Portfolio Board. The final draft is due to be approved by Members Summer 25/26.
	A change in approach to the future of the markets has resulted in the cancellation of the Markets Co-location Programme and the initiation of a new Markets Programme. The landlord works at the Museum of London are nearing completion, work on Salisbury Square and the Future Police Estate Programme continues to plan, and the Barbican Renewal Programme has been established with governance arrangements confirmed at P&R (May 2025).

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	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 document is in the process of going through Member governance, having been endorsed by the Town Clerk's Portfolio Board. • 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 November 2025	10-Jun-2025	Matthew Miles	31-Dec- 2025

	I				
		Plan to be presented and approved at PPsC (June 25), Finance Committee (July 25), and CoCo (July 25).			
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. A transformation funding proposal was submitted to undertake this work in April 2025, with funding approval confirmed in May 2025. A vacancy in the Projects Skills and Capability Manager role is contributing pressures. However, an apprentice is being recruited to provide administrative support.	10-Jun-2025	Nadhim Ahmed	30-Nov- 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 pilot portfolio dashboard reporting to be trialled in early May, with the system expected to be in use for the first full Portfolio reports at end May 2025. During transition data quality assurance is underway, with assured dashboard reporting expected in September 2025. Phase 2 system implementation planning is underway. This will cover changes associated with the updated Project Procedure and implementation of a benefits module. Delivery of a finance module and integration with finance systems will form Phase 3.	10-Jun-2025	Matthew Miles	31-Dec- 2025
CR33I Cashflow and Forecast Monitoring	Monitor the high-level cashflow/forecast monthly	The Investment Management Monthly Meeting is ongoing. 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 with a quarterly updated in May. Quarterly monitoring/reporting will continue going forwards.	11-Jun-2025	David Abbott	31-Mar- 2029

		The achievement of property sales on time, as well as drawdown from financial investments, is necessary to fund cash outflows. This is a key risk that will continue to be monitored.			
CR33m Secure Third- Party Funding	Secure Third-Party Funding	A project update report is prepared for information to the Finance Committee, Capital Buildings Board and Policy & Resources Committee on a regular basis. This will continue throughout the lifespan of the Major Programmes.	03-Jun-2025	Sonia Virdee; Paul Wilkinson	31-Mar- 2029
CR33n Provide regular Member updates	Provide regular Member updates	A project update report is prepared for information to the Projects and Procurement Sub Committee, Finance Committee, Capital Buildings 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 002	Title	Housing Revenue Account Financials		
Description	originally foreseen. Potential issue around non-recoverability requiring funding source. Event : Inability to contain financial pressures on the Housing	of elements of service ch g Revenue Account, espe	nn 2022; capped rents and higher repairs and maintenance costs than harge costs and extensive planned 10 year programme of major works cially around repairs and maintenance costs, management costs and e inability to readjust capital projects within budget parameters pose further		
	risk. Effect: The City Corporation's reputation is damaged due to	Γhe City Corporation's reputation is damaged due to failure to deliver housing services.			

Current Risk Assessment, Score & Trend Comparison	px p	16	•	Constant
Likelihood	Likely	Impact		Major
Risk Score	16	Review Date	е	302-Sept-2025

Target Risk Assessment & Score	Impact	8	
Likelihood	Unlikely	Impact	Major
Risk Score	8	Target Date	30Sept-2025

The latest financial position on the overall HRA was agreed in the latest Estimates report in January 2025. An updated five year financial projection was previously presented to members in September 2024. Latest projections show the revenue funding position remains precarious and vulnerable to revenue overspends, further delays to new build projects or significantly rising capital costs (leading to higher loan repayments and interest charges).
On 7 March Court of Common Council approved rent increases of 7.7%. Work on a revised 10 year plan including the latest projections for works on GLE is expected to be ready for the P&R Away Day in July.

Risk Level	Departmental	Department	Chamberlain's
Creation Date	16-Oct-2023	Risk Owner	Sonia Virdee
Approach	Reduce	Risk Administrator	Leah Woodlock
Head of Profession 1	Financial Services	Risk assigned to	Mark Jarvis

Head of Profession 2	Estates & Facilities	Committee	Finance Committee
Head of Profession 3		Parent Risk	CHB Departmental Cross Cutting Risks

Ref No:	Action Description		Latest Note Date	Action Owner	Due Date
CHB002a Capital Schemes Monitoring	Close monitoring of capital schemes is required during 2025/26, update to be provided in regular reporting of capital forecasts next due in July. Continue to monitor the risk around non-recovery of leaseholder contributions to capital projects.	Close monitoring of capital schemes is required during 2025/26, update to be provided in regular reporting of capital forecasts due in the revised HRA 10 Year Plan to be completed by July 2025. Further risk of delays to new build projects will impact the 10 Year Plan revenue projections. Continue to monitor the risk around non-recovery of leaseholder contributions to capital projects. Many other London Boroughs also have very fragile HRAs and we are working with local government colleagues as well as MHCLG and Treasury on wider solutions to current challenges.	10-Jun-2025	Mark Jarvis	31-July- 2025
CHB002b Repairs & maintenance	Increased repairs and maintenance costs and energy costs.	The Savills report identified high repairs and maintenance costs, management costs and depreciation charges. The current repairs and maintenance contract is being re-procured in 2025/26. The calculation of the depreciation charge has been reviewed with external valuers and significantly reduced as a result – this has helped to offset past inflationary revenue pressures. The 2025/26 budgets show a very finely balanced position that will be updated in the review of the 10 Year Plan figures in July.	10-Jun-2024	Mark Jarvis	31-July- 2025

CHB 003	Title Inconsistent application of the internal control environment	
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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

Current Risk Assessment, Score & Trend Comparison	Impact	8	•	Constant
Likelihood	Likely	Impact		Serious
Risk Score	8	Review Date	9	26-Feb-2025

Target Risk Assessment & Score	Dog Impact	4	
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	Leah Woodlock
Head of Profession 1	Commercial	Risk assigned to	Sonia Virdee
Head of Profession 2	Financial Services	Committee	Finance Committee
Head of Profession 3	Internal Audit	Parent Risk	

Ref No:	Action Description	Latest Note	Latest Note Date	Action Owner	Due Date
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 revision is currently being socialised amongst the working group. Some interdependencies to the Programme Sapphire (ERP) implementation exist.	07-Jun-2025	Matthew Miles	31-Jul-2025
CHB003e Review of procurement regulation	Review of procurement regulations	Procurement Code is being updated however the first presentation of the revised policy format has not landed well so it is being revisited. Consequently, the timeline for ultimate approval by Court of Common Council is likely now to be October. The revised schedule will see the Code brought to Projects and Procurement sub-Committee and Finance Committee in September,2025 and the Court of Common Council in October 2025.	10-Jun-2025	Sue Smith;	31-Oct - 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.	16-Jun-2024	Sonia Virdee; Genine Whitehorne	31-Jul-2025

		Monthly reviews are taking place at Financial Leadership Group to highlight any areas of concern. A deep dive session focusing on issues is being planned for its June meeting			
Leadership Group Interventions	are responsible for partnering with departments and services	Current actions and mitigations are reviewed and discussed at the monthly Finance Leadership Group. The performance of departments and institutions are reviewed monthly, with finance reps sharing their best practice on reducing non-compliance.	12-Jun-2025	Sonia Virdee	31-Jul-2025

Code CHB 001	Title	Chamberlain's department transformation and knowledge transfer
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Description	Cause: Transferring knowledge can be challenging due to resistance to change, poor training, or lack of proper documentation.			
	Event: Culture change is insufficient. Corporate memory is lost. The Chamberlain's Department is not fit for the future.			
	Effect: Chamberlain's Department fails to deliver its objectives.			

Current Risk Assessment, Score & Trend Comparison	pouge?	4	•	Constant
Likelihood	Unlikely	Impact		Serious
Risk Score	4	Review Date	9	09-Apr-2025

Target Risk Assessment & Score	Dog Impact	4 Cariava	
Likelihood	Unlikely	Impact	Serious
Risk Score	4	Target Date	31-Dec-2025

Most of the vacancies within the commercial, change and portfolio delivery team have been successfully recruited into. The approach to the remaining vacancies will be to recruit and fill on the basis of upcoming priorities.
The Learning and Engagement Board continues to support and develop staff. A skills matrix assessment has been commissioned for Finance Staff, this is being piloted with the Financial Shared Services team, with the plan to extend to all finance teams within Chamberlain's department.
A strategic review of Commercial and Contract management has been completed in November 2024. The implementation was approved by PPSC in December.
The five improvement workstreams have been established with a core focus on readiness for the Procurement Act 2023.
A procedure note review is underway and pending the positive results of this review, this risk will be deactivated.

Risk Level	Departmental	Department	Chamberlain's
Creation Date	12-Nov-2021	Risk Owner	Caroline Al-Beyerty
Approach	Reduce	Risk Administrator	Leah Woodlock
Head of Profession 1	Financial Services	Risk assigned to	Chamberlain
Head of Profession 2		Committee	Finance Committee

Head of Profession 3		Parent Risk	CHB Departmental Cross Cutting Risks
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Ref No:	Action Description	Latest Note	Latest Note Date	Action Owner	Due Date
members	Colleagues are provided with the training they need to fulfil their role.	A CIPFA skills matrix to independently analyse strengths and areas for improvement for Chamberlain's staff. This has now been completed by FSS and Internal Audit. Results have been received for FSD, which are currently being reviewed. Treasury and Pensions are now in the process of undertaking the matrix. Key workstreams for the board have been identified and are currently being progressed. Lunchtime learning sessions are being delivered on a variety of topics in the coming months. Separate to the above, the Financial Services Division have carried out training sessions to support staffs continued professional development; these sessions have been mandated to support staff with upskilling through the year end closedown process. Training sessions will be programmed into annual forward plans to ensure continued development. In addition, succession planning is now being reviewed to support skill shortages within capital, supported by excellent interim support. Alongside the above the FSD are also launching their Financial Improvement and Transformation strategy (FIT) in June. This links to the Corporate Plan and People Strategy. One of the goals is to imbed best practice and transformation across the organisation.	10-Jun-2025	Phil Black	31-Dec- 2025
CHB001g Commercial and Contract Management Improvement Plan	A draft improvement plan is being formulated following the recommendations from the strategic review. Further details will be provided in Q4 of the progress of identified quick wins.	A workstream has been identified within the Commercial Transformation plan which is focussing on training and development. This has specific deliverables and initiatives that are planned to be rolled out over Q4 and Q1 (FY 25-26). All Commercial Services team members have completed PA23 eLearning and also have completed a self assessment to identify the depth of their knowledge in skills-based criteria related to their roles with targeted procurement and soft skills training to be delivered via personalised 2025/26 development plans.	10-Jun-2025	Nish Dubey	31-Dec- 2025
CHB001h Procedure Notes Review	Undertaking of an audit of all critical processes and ensuring	All process owners have been requested to provide evidence of procedure notes for critical processes for review by Chamberlain's SLT at the July meeting.	28-Jun-2025	Leah Woodlock	31-July- 2025

appropriate materials are in place		

Code	CHB 005	Title	Resistance to Transformation and Change (Change Fatigue)

Description Cause: Ineffecti Culture Resource Ineffecti Event:

- Ineffective change management and business transformation activities
- Culture of resisting change within the organisation
- Resource capacity staff are consumed by BAU tasks they have no further capacity to support change
- Ineffective prioritisation of programmes
- Low user acceptance rates and failure to integrate the necessary cultural changes.
- Low change readiness
- Un-utilised technologies or enhancements
- Additionally, the broader transformation programme (such as users not fully adopting the new ERP system), may face resistance. This can result in resistance to the business transformation that the transformation programme and other initiatives aim to achieve.

Effect:

Decreased productivity, increased operational costs, and failure to achieve the desired outcomes of the Transformation programme and
the broader transformation initiatives. The lack of business transformation may hinder the corporation's ability to modernise operations
and align with the current corporate plan and strategies. Furthermore, the failure to achieve the transformation goals, such as improved
efficiency, increased capacity, and better information management, may negatively impact the corporation's ability to deliver on its
strategic objectives and maintain a competitive edge.

Current Risk Assessment, Score & Trend Comparison	Impact	12	•	Constant
Likelihood	Possible	Impact		Major
Risk Score	12	Review Da	te	12-May-2025

Target Risk Assessment & Score	Impact	2		
Likelihood	Unlikely	Impact	Minor	
Risk Score	2	Target Date	30-Jun-2026	

Latest N	Currently, numerous transformation/improvement programs and new strategies are being implemented across the Chamberlain department and the wider City of London Corporation.

Risk Level	Departmental	Department	Chamberlain's
Creation Date	12-May-2025	Risk Owner	Genine Whitehorne
Approach	Reduce	Risk Administrator	Leah Woodlock
Head of Profession 1	Financial Services	Risk assigned to	Chamberlain
Head of Profession 2	Commercial	Committee	Finance Committee
Head of Profession 3	Strategy & Plans	Parent Risk	

Ref No:	Action Description	ILATEST NOTE	Linked Actions Progress	_	Action Owner	Due Date
CHB 004c Change Champions Network	Launch an officer change champion network	On the 2 nd May, the Change champion network was launched. Programme Sapphire (ERP Programme) is being used as a launch pad for the network. A new lead for the Change Network has been appointed and will start in June.	60%	06-Jun-2025	Change Leads	31-May- 2025
	Identifying and engaging with key stakeholders to enable success of the transformation	Introducing change leadership role to Future Ambition 18, utilising the bi-monthly meetings to present the change and transformation programmes.	20%	12-Jun-2025	Programme Leads	30-Apr- 2026
CHB 005b Change Management Strategy	Develop a change management strategy	A need for a change management strategy has been identified and will form a requirement for the new transformation strategic partner.	0%		Genine Whitehorne	30-Nov- 2025

CHB 005d Strategic	Procure a transformation	The specification for the strategic partner is	0%	06-Jun-2025	Genine	31-Jul-
Transformation Partner	partner to deliver the	being finalised, Project and Procurement Sub			Whitehorne	2025
	transformation agenda.	committee will be presented with the				
		Procurement strategy in July.				

Code	CHB 004	Title	Vetting Delays				
Description	 Cause: Due to the high demand for vetting services, CHB staff applications for security vetting are experiencing significant delays, potentially taking over 12 months from the point of application. 						
		strain on the services prov	OLP projects would cause significant delays in service delivery. This vided to COLP, leading to a lack of resilience and impacting the timely				
	The shortage of eligible staff is creations.		the resilience of services provided to COLP. This lack of resources is provide necessary support, leading to delays and inefficiencies.				

Current Risk Assessment, Score & Trend Comparison	Impact	6	ı	Constant	
Likelihood	Possible	Impact		Serious	
Risk Score	6	Review Date		12-May-2025	

Target Risk Assessment & Score	Impact	2	
Likelihood	Unlikely	Impact	Minor
Risk Score	2	Target Date	12-May-2025

Latest Note	This risk has been identified due to the high demand for vetting services Chamberlain's staff applications (especially those in IT, Procurement and
	Projects) for security vetting are experiencing significant delays (both new applications and renewals). The timeframes for vetting, have identified weakened resource for the increasing demand of COLP projects.
	weakened resource for the increasing demand of COLF projects.

Risk Level	Departmental	Department Chamberlain's	
Creation Date	12-May-2025	Risk Owner Chamberlain	
Approach	Reduce	Risk Administrator Leah Woodlock	
Head of Profession 1	Financial Services	Risk assigned to Chamberlain; Zakki Ghauri; Genine Whitehorne	
Head of Profession 2	Commercial	Committee Finance Committee	
Head of Profession 3	IT	Parent Risk	

Ref No:	Action Description	II atest Note			Action Owner	Due Date
	Hold regular Vetting Review Meetings	Monthly meetings have now been scheduled to review current vetting status and prioritise	20%	12-Jun-2025	DITS	31-Dec- 2025
,	Utilisation of the Police National Vetting Service (provided by Warwickshire Police	Using the national vetting service, applications can be made to reduce the demand on the COLP service.	20%	12-Jun-2025	ЕРМО	31-Dec- 2025