ARMC - Corporate Risks - Detailed Report

28 August 2025



Rows are sorted by Risk Score

Risk Code CR16	Risk Title	Information Security (formerly CHB IT 030)
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Cause: Breach of City of London Corporation IT Systems resulting in unauthorised access to data by internal or external sources.

Event: The City Corporation does not adequately prepare, maintain robust (and where appropriate improve) effective IT security systems and procedures.

Description

Effect: a) Failure of all or part of the IT Infrastructure with associated business systems failures. b) Harm to individuals. c) A breach of legislation such as the Data Protection Act 2018 and UK-GDPR. d) Incurrence of a monetary penalty. e) Corruption of data. f) Reputational damage to City of London Corporation as an effective body.

Current Risk	Impact		
Risk Score	Likelihood	Impact	
24	Possible	Extreme	
Red	Trend	Constant	

Target Risk	Impact			
Risk Score	Likelihood	Impact		
16	Unlikely	Extreme		
Red	Target Date	31-Oct-2025		

Original Risk	Impact		
Risk Score	Likelihood	Impact	
6	Possible	Serious	
Amber	Creation Date		

F	Risk Level	Corporate	Risk Approach
	Department	Chamberlain's	Risk Owner

Risk Approach	Reduce
Risk Owner	Caroline Al-Beyerty

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
CR16q User behaviour monitoring	for any suspicious or unauthorised behaviour	Currently, our network activity monitoring is operational, and now flows into a single platform – giving as a full view of all of our security logs. We have 24/7 monitoring of these logs, and are looking to work with our colleagues in our Institutions to look at a single service and common tools to protect all parts of the organisation. Our new 24/7 Service provides better opportunities for Institutions to be part of a single platform.		Gary Brailsford- Hart	31-Oct-2025

CR16r Access control monitoring	Monitoring access control systems and processes to ensure that only authorised users have access to sensitive information	Controls are in place to manage the access control to the estate; improvements have been made in the application of multifactor authentication. However, the escalation and acceptance of privileged accounts remains within the IT department and is not subject to independent scrutiny. Steps for implementation: Assessment of Current Practices Development of an Independent Oversight Protocol Implementation of a Formal Privileged Access Policy Regular Audits and Reviews Segregation of Duties Training and Awareness Enhanced Authentication and Monitoring for Privileged Accounts Feedback and Continuous Improvement By implementing these steps, the City can strengthen its control over privileged accounts, ensuring they are granted appropriately and are subject to rigorous and independent scrutiny.	13-May-2025	CJ Chapman	31-Jul-2025
CR16s Incident response	Developing and implementing a plan to respond to any security incidents that occur.	Review Admin rights Controls are in place to manage the access control to the estate; improvements have been made in the application of multifactor authentication. However, the escalation and acceptance of privileged accounts remains within the IT department and is not subject to independent scrutiny. Steps for implementation Assessment of Current Practices Development of an Independent Oversight Protocol Implementation of a Formal Privileged Access Policy Regular Audits and Reviews Segregation of Duties Training and Awareness Enhanced Authentication and Monitoring	12-Aug-2025	Zakki Ghauri	31-Oct-2025

		for Privileged Accounts Feedback and Continuous Improvement By implementing these steps, the City can strengthen its control over privileged accounts, ensuring they are granted appropriately and are subject to rigorous and independent scrutiny. Review Admin rights			
CR16t Security information and event management (SIEM)	Using software tools to collect and analyse data from various security sources to detect and respond to security incidents.	Tooling is in place and operating. Microsoft Sentinel is in place and collecting activity from across CoL. This has been monitored by a 24/7 team and managed by the InfoSec team who have been detecting and investigating incidents highlighted by the SIEMOC. Tooling is in place but resources to review, analyse and action remain outstanding. Our SOC performs much of the remediation activity but some investigations are still with internal teams and require resourcing. When firewall logs are implemented, this need will increase further.	13-May-2025	CJ Chapman	30-Jun-2025
CR16v Security Baseline assessment – COL/COLP/Instit utions	Security Baseline assessment – COL/COLP/Institutions	Initial assessment complete, work is ongoing to identify trends and a developments plans and updates to the CAF will continue. Feedback from the institutions is positive and the NCSC CAF is accepted as a baseline standard. The appetite for review has been agreed as annual owing to resource constraints and the likely timeframes for improvements to be made. Funding received, requires Carry forward request	12-Aug-2025	CJ Chapman	30-Sep-2025
CR16w Cyber Security Improvement Programme	Cyber Security Improvement Programme	In ongoing action to mitigate this risk, agreement has been made to implement a Cyber Security Improvement Programme, consisting of:	12-Aug-2025	Zakki Ghauri	31-Oct-2025

The appointment of a cross-Corporation CISO who will be responsible for Cyber Security across the Corporation and our Institutions		
Investigating having a single Cyber Security team that works across the wider organisation. This work will be commencing in August.		

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 program

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 sustainable savings as planned, 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	Impa Impa	ct	
Risk Score	Likelihood	Impact	
16	Likely	Major	
Red	Trend	Constant	

Target Risk	Impa	olict
Risk Score	Likelihood	Impact
8	Unlikely	Major
Amber	Target Date	31-Mar-2026

Original Risk	Impac Impac	et et
Risk Score	Likelihood	Impact
24	Possible	Extreme
Red	Creation Date	19-Jun-2020

	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:	23-Jun-2025
	 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	Risk Approach	Reduce
Department	Chamberlain's	Risk Owner	Caroline Al-Beyerty

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
CR35a Impact of inflation	Monitoring the impact of inflationary pressures (including pressures on energy costs) and construction inflation impacts on capex programme • Use of inflation contingency	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.	23-Jun-2025	Sonia Virdee	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.	23-Jun-2025	Sonia Virdee	31-Mar-2029

Achievement of current Savings Programme Programme Authority) Develop income generation opportunities Programme The profiling of remaining fundamental review savings. 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	CR35f	Delivering the current savings	Court of Common Council, in March 2025 reaffirmed	23-Jun-2025	Alistair Cook:	31-Mar-2026
and prioritisation on income 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	current Savings	year-on-year savings (including Police Authority) • Develop income generation	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 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		Genine	31-Mar-2026

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 inyear 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.		Sonia Virdee; Genine Whitehorne	31-Mar-2026
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Risk Code CR36	Risk Title	Protective Security
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Description

Cause: Lack of appropriate governance, inadequate security risk assessments, prioritisation, and mitigation plans. Inadequate, poorly maintained or time expired security infrastructure and policies; lack of security culture and protective security mitigation; poor training, inadequate vetting, insufficient staff.

Event: Security of an operational property and event space is breached, be that internal threat, protest and/or terrorist attack. Publicly accessible areas for which the Corporation are responsible for are subject to an undisrupted Terrorist attack.

Effect: Injury or potential loss of life caused by an undisrupted attack, unauthorised access to our estate by criminals/protestors/terrorists; disruption of business/ high profile events; reputational damage.

Current Risk	Impa Impa	ct
Risk Score	Likelihood	Impact
16	Unlikely	Extreme
Red	Trend	Constant

Target Risk	Pool Impact			
Risk Score	Likelihood	Impact		
16	Unlikely	Extreme		
Red	Target Date	31-Jul-2026		

Original Risk	Impact	
Risk Score	Likelihood	Impact
16	Unlikely	Extreme
Red	Creation Date	10-Jan-2022

	All work streams continue to be active, with sub groups dealing and reporting back to SSB.	
Latest Note	With the new Director of HR, a meeting is being convened before next SSB to reimplement people security board, with an appropriate HR chair.	30-Jul-2025

Risk Level	Corporate
Department	Town Clerk's

Risk Approach	Accept
Risk Owner	Gregory Moore; Richard Woolford

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
CR36c Command and Control		Ongoing CPD planning for all Gold and Silver commanders continues. There are planned table tops	30-Jul-2025	Richard Woolford	31-Jul-2026

	·	-			
		in traction to maintain resilience around high profile events and resilience factors.			
CR36d Prevent	Prevent	Prevent continues to be monitored across COLC in support of COLP. This is addressed within the governance board and updates to SSB.	30-Jul-2025	Valeria Cadena	31-Jul-2026
CR36f City of London Corporation Buildings	Protect	PSAB continues to monitor threat and risk and mitigation. This board leads on the Terrorism (Protection of Premises) Bill requirements, in partnership with COLP. VSAT and Ongoing reviews are monitored in this meeting looking at various attack methodology. New future COLC builds the security planning has commenced with partners. CHoS has started to design a testing regime for security leads that will support implementation of Martyn's law and develop teams. Table tops are the start. GSMD will be having a TT 3rd July. This is acting as a pilot event.	30-Jul-2025	Neil Evans	31-Jul-2026
CR36g Protect Public Realm Board	Protect	Partnership working under the umbrella of the Public Realm Protect Board remains crucial, with the City Corporation working alongside colleagues at the City Police and TFL to identify risk and to consider proportionate mitigations. The board's ongoing focus remains new public spaces planning development and the likely implications from the upcoming legislation. Monitored at SSB. The applications and use of ATTRO by COLP and MPS is being continually reviewed and checked prior to authorisation.	30-Jul-2025	lan Hughes	31-Jul-2026

Risk Code	CR01	Risk Title	Resilience Risk
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Description

Cause - Lack of appropriate planning, leadership and coordination

Event - Emergency situation related to terrorism or other serious event/major incident is not managed effectively

Effect - Major disruption to City business, failure to support the community, assist in business recovery. Reputational damage to the City as a place to do business.

Current Risk	Impact	
Risk Score	Likelihood Impact	
12	Possible	Major
Amber	Trend	Constant

Target Risk	Impact	
Risk Score	Likelihood	Impact
8	Unlikely	Major
Amber	Target Date	31-Dec-2025

Original Risk	Impact	
Risk Score	Likelihood	Impact
8	Rare	Extreme
Amber	Creation Date	20-Mar-2015

Latest Note	Risk Connect business continuity software system has been through a successful roll out implementation period with departments across the Col completing Business Impact Analysis BIA – the system is currently at 95 % completion rate to be completed across the organisation by June 2025 followed by a periodic updates refresh and testing by departments supported by resilience team	26-Jun-2025
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Risk Level	Corporate
Department	Town Clerk's

Risk Approach	Reduce
Risk Owner	Gary Locker; Gregory Moore

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
CR01L Risk Connect – RC	on to the RC system	Risk Connect is the system now holding Department and organisation BC plans work is ongoing to ensure all depts and institutions across the Colc understand how to use the system and are implementing their plans with		Gary Locker	01-Nov-2025

		oversight from Directors and SLT for departments and revolving audit and refreshing of BIA throughout each year supported and driven by the resilience team . BIA and BC implementation will be a revolving piece of work – next step is to facilitate a masterclass high level BC session for SLT and to raise the profile of RC EARLY 2026- 95% of the BIA across the organisation are on the system with work ongoing to test and audit and implement BCM plans			
CR01M Risk Connect – RC LALO support role Local Authority Liaison Officer	Key role of a trained corporation member of staff to attend the scene of an incident deployed by resilience team and feedback reports and requests from emergency service as part of local authority response and support	LALO support role. This is a revolving process and further refresher and new staff development training and exercise in this role will be sought during 2025 Conversations ongoing with Environments team as to how Enforcement officers could possibly support this function and strengthen the current pool as well as opportunities to enhance a dedicated pool of on call LALO officers.	26-Jun-2025	Gary Locker	31-Oct-2025
CR01N Standardisation procedures including Gold leadership Training	To increase City capability and resilience in also supporting wider London boroughs during major incident response, covers the key support functions of emergency centres and Gold strategic leadership	MAGIC Multi Agency Gold Incident Command course delivered by National Police College hosted and funded by Col completed 27-30 January 2025 for Col SLT and external partners – HALO Humanitarian Lead Officer training now complete – Call/recruitment for further crisis support volunteers internally resilience team collaborating with DCCS – DROP in sessions start 29th May for staff to understand the role of crisis support and working in emergency centres - includes form to be completed showing expression of interest follow up training to be delivered funding secured to link with British Red X training November 2025 hosted at Walbrook wharf earlier 2025 date also being investigated for training with external facilitator to compliment British Red X session SLT to attend full day Public Inquiry session delivered with resilience team and external facilitator Barrister to develop knowledge of PI and giving evidence in courtroom scenario 18th November 2025 at GH Basinghall Suite venue.		Gary Locker	18-Nov-2025

CR01Q Rolling	Plan an annual calendar of IT DR tests,	Work currently underway with Contingency Planning	15-Apr-2025	31-Dec-2025
DR tests	covering critical systems and services	Officer. Meetings have taken place with DITS SLT and		
		a Business Impact Analysis template will be completed		
		across all DITS functions		

Work is ongoing to review CR02 Loss of Business Support to ensure it remains aligned with current and emerging contexts.

Risk Code	CR02	Risk Title	Loss of Business Support for the City

Description

Cause: The City Corporation's assessment of the strategy and approach to promotion and support does provide the appropriate and targeted interventions at the right time, particularly following the Covid 19 pandemic.

Risk Event: The City Corporation's actions to promote and support the competitiveness of the business City are not fully effective (post Covid). **Effect**: The City loses its ability to attract and retain high value global business activity, both as a physical location and in mediating financial and trade flows; the City Corporation's business remit is damaged, and its perceived relevance is diminished. Reputational damage to the City as a place to do business and to Corporation ability to govern effectively

Current Risk	Impact		
Risk Score	Likelihood	Impact	
12	Possible	Major	
Amber	Trend Constant		

Target Risk	Impact			
Risk Score	Likelihood	Impact		
8	Unlikely	Major		
Amber	Target Date	31-Mar-2025		

Original Risk	Impact		
Risk Score	Likelihood	Impact	
8	Unlikely	Major	
Amber	Creation Date	17-Feb-2015	

Latest	Note

The risk score remains the same at an amber 12 although this is kept under regular review. Inflation is currently at 3.6% (June 25). This is above the Bank of England's (BoE) 2% target. The government continues to remain committed to growth. We continue to monitor policy announcements in relation to FPS and the government's mission to secure growth for the UK.

05-Aug-2025

Risk Level	Corporate
Department	Innovation and Growth

Risk Approach	Reduce
Risk Owner	Damian Nussbaum

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date

	Risk Code	CR09	Risk Title	Health, Safety and Fire Risk Management System
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CAUSE: Insufficient, inappropriate or ineffective management responsibility and accountability for the successful implementation of the health, safety and fire management system, also known as the health and safety management system.

Description

EVENT: The City Corporation does not fulfil legal and other requirements; does not identify or adequately address emerging or changing risks reducing health and safety levels; ineffective and disjointed health and safety management system across the City Corporation means assurance cannot be provided; poor or no integration of the health and safety management system with strategic and operational functions of the Corporation resulting in poor decision making and prioritisation.

EFFECT: Work or location-related death(s), injuries and ill health; unsafe workplaces or services; physically and mentally unhealthy workplaces and activities leading to increased absence or cost of harm. Enforcement agency action. Organisation fines up to £10 million; individual imprisonment up to 2 years' custody; Corporate Manslaughter unlimited fine and offence range up to £20 million. Adverse media attention and significant reputational damage. Significant negative impact on Corporate Plan deliverables, employee morale and service user trust. City of London Corporation not the employer of choice or regarded as a world class organisation. Suspension or removal of license to operate or deliver key functions.

Current Risk	Impa	ct
Risk Score	Likelihood	Impact
12	Possible	Major
Amber	Trend	Constant

Target Risk	Impa	ct
Risk Score	Likelihood	Impact
4	Rare	Major
Green	Target Date	29-Mar-2029

Original Risk	Impact		
Risk Score	Likelihood	Impact	
12	Possible	Major	
Amber	Creation Date	04-May-2017	

Latest Note	The Corporate Safety Mgt Framework is now complete and live. This will take time to embed across departments, and for mechanisms to align themselves to organisational mechanisms, our change plan is in place to support this. The development of local Safety capability is on track with departments implementing the competency requirements within their operations progress is variable and budget dependent.		
		Tools (Risk Assessment / Incident Reporting / Safe365 SMS improvement) to support departments have been deployed as planned. The ESM training is on track to be delivered from 1st June. The second line of defence function is now reset, departments are meeting and the HSPN (Professional Network) is back online and meeting monthly. Safety issues are being regularly triaged by the team and	

guidance being offered to departments with escalations taking place as necessary to SLT and Committee (CSC) made aware as necessary.

Safe365 has now been deployed and baseline assessments of departmental safety management processes produced. The improvement plans are being folded into this years Business Planning process. A target has been set, 65% which will ensure across all High Risk departments we attain a minimal compliance standard across the CoL for. Which to be able to provide assurance. The procedures, locally will allow us to provide assurance into the controls in place at a departmental level, giving rise to Corporate exposure from this risk.

Risk Level	Corporate
Department	Town Clerk's

Risk Approach	Reduce
Risk Owner	Gregory Moore; Oliver Sanandres

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
Adequate	Implementation of the City Corporation H&S Business Plan. Regular monitoring of progress against the plan by the City Corporation H&S Committee.	their wellbeing plans.	•	Gregory Moore; Oliver Sanandres	30-Apr-2026

Risk Code CR30	Risk Title	Impact of Climate Change
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CAUSE: The Corporation is under pressure from both the physical impacts of climate change and the transition to a low-carbon economy. Climate change is leading to hotter, drier summers, warmer, wetter winters, rising sea levels, and more extreme weather events. To mitigate the worst potential impacts of climate change, the Paris Agreement (a legally binding international treaty) aims to limit the global average temperature increase to well below 2°C above pre-industrial levels, with efforts to cap the rise at 1.5°C. RISK EVENT: Changing weather patterns in the City of London may result in heat stress, flooding, water scarcity, biodiversity loss, increases in pests and diseases and disruption to food, trade and infrastructure. The Square Mile's dense urban environment and aging infrastructure could amplify these climate

diseases and disruption to food, trade and infrastructure. The Square Mile's dense urban environment and aging infrastructure could amplify these climate impacts. As the global drive to reduce emissions transforms the economic landscape, we are seeing tightening regulation, changing investor preferences, and technological disruption.

EFFECT: The combination of physical and transition risks could lead to significant financial impacts through increased operational costs, stranded assets, reduced investment returns, and reduced attractiveness of the City. The Corporation's reputation and influence could be damaged if it fails to demonstrate leadership in both climate resilience and low-carbon transition, potentially weakening London's position as a sustainable financial centre.

Current Risk	Impa Impa	ct	
Risk Score	Likelihood	Impact	
12	Possible	Major	
Amber	Trend	Constant	

Target Risk	Impa Impa	oct
Risk Score	Likelihood	Impact
6	Possible	Serious
Amber	Target Date	31-Mar-2027

Original Risk	Impact		
Risk Score	Likelihood	Impact	
24	Possible	Extreme	
Red	Creation Date	07-Oct-2019	

II STAST NATA	Progress continues on actions which mitigate climate change (working toward net zero emissions for the Corporation and City), and adapt to its impacts (building our climate resilience). Risk remains the same.	25-Jun-2025
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Risk Level	Corporate	
Department	Innovation and Growth	

Risk Approach	Reduce
Risk Owner	Damian Nussbaum

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
CR30a Decarbonising our operational and investment asset portfolios	As part of our Climate Action Strategy, we are aiming to achieve net zero for our own operations by 2027 and full value chain by 2040. Operational assets comprise over 95% of our operational footprint. Investment assets (both commercial and residential) comprise 25% of our total footprint. Decarbonising these portfolios is achieved through investment in energy efficiency measures, low carbon heat, and onsite renewable energy generation.	Investment in decarbonisation activities is accelerating as forecast. Emissions results for 2024/25 are currently being assessed and will be reported in autumn 2025.	25-Jun-2025	Kate Neale	31-Mar-2027
CR30b Decarbonising and reducing climate risk in financial investments	As part of our Climate Action Strategy, we are aiming to achieve net zero for our full value chain by 2040. Emissions from our financial investments (across all Funds) comprise over 40% of our total footprint. Emissions reductions are achieved through engagement with Fund managers and strategic alignment with lower carbon, lower risk investments.	Investment strategies are under reassessment currently, and identifying new opportunities to align with net zero. Emissions results for 2024/25 are currently being assessed and will be reported in autumn 2025.	25-Jun-2025	Kate Neale	31-Mar-2027
CR30c Decarbonising our supply chain	As part of our Climate Action Strategy, we are aiming to achieve net zero for our full value chain by 2040. Emissions from our supply chain comprise nearly 25% of our total footprint. Emissions reductions are achieved by setting requirements of suppliers to measure and reduce their own emissions. In addition, our Net Zero Design Standard tackles the embodied carbon in our construction, and our Circular Economy Strategy enables emission reduction from waste.	Work with suppliers continues, especially through programmes such as Heart of the City's climate course. Emissions results for 2024/25 are currently being assessed and will be reported in autumn 2025.	25-Jun-2025	Kate Neale	31-Mar-2027

CR30d Decarbonising the City	As part of our Climate Action Strategy, we are aiming to achieve net zero in the Square Mile by 2040. Over 70% of emissions from the City come from commercial buildings, with the remainder largely from transport. Emissions reductions from City buildings can be achieved through tighter planning controls, enabling a change to energy infrastructure (such as heat networks), enabling widespread asset investment in energy efficiency, and supporting the Circular Economy. Transport emissions are tackled through pedestrianisation programmes, anti-idling campaigns and working in partnership with TfL.	Focus continues on the biggest areas of opportunity: heat network expansion (with several papers coming to Committees through 2025), and planning policy interventions. Emissions results for 2022 are currently being assessed and will be reported in autumn 2025.	25-Jun-2025	Kate Neale	31-Mar-2027
CR30e Supporting nature recovery and carbon sequestration in open spaces	As part of our Climate Action Strategy, we are supporting nature and biodiversity recovery in the City and Corporation's open spaces. This focuses on protecting carbon sequestration from climate change, and increasing sequestration capacity of soils and plants. The sequestration capacity is fundamental to achieving net zero by 2027, balancing out the Corporation's emissions.	Open spaces sequester over 16ktCO2e a year. We continue to invest in biodiversity supporting activities, and will be reassessing sequestration rates in late 2025.	25-Jun-2025	Kate Neale	31-Mar-2027
	As part of our Climate Action Strategy, we are increasing resilience of the Corporation's buildings and open spaces. This includes protecting open spaces from climate risk including drought and forest-fire, and surveying Corporation assets to plan targeted interventions to mitigate impacts of flooding and overheating risk.	Resilience measures are being piloted, protecting high risk assets from extreme weather events. Resilience in open spaces is focussed on preventing forest-fire and mitigating drought, and so hundreds of leaky dams are being installed across Epping Forest and Hampstead Heath, and staff are provided with and trained with fire foggers. This is of particular importance in summer months with increased risk of wildfire.	25-Jun-2025	Kate Neale	31-Mar-2027

CR30g Increasing climate resilience in the City	As part of our Climate Action Strategy, we are increasing resilience of the public spaces and infrastructure in the Square Mile. This includes doing extensive surveying of the above and below ground infrastructure to inform opportunities for intervention, and deploying street-level interventions to mitigate flood and overheating risks.	Emergency resilience planning is progressing for heatwaves and supporting vulnerable residents, promoting the network of Cool Spaces in the City. Work continues to plant trees and introduce flood-mitigating planting.	25-Jun-2025	Kate Neale	31-Mar-2027
CR30h Supporting skills for low carbon economy	The Policy and Innovation team within Innovation & Growth lead a 'Skills for a sustainable skyline taskforce', which aims to drive change in the green skills space by encouraging and upskilling workers and attracting diverse talent.	The Skyline Taskforce launched its main output, the Skyline Skills Hub, in December 2024. The Hub comes from the collaborative inputs of 350+ built environment leaders, and it is a 'one stop shop' resource for green skills best practice. The Hub has had strong engagement with its target audiences (employers, supply chain, new entrants and policymakers) since its launch. The next step will be the launch of the 'Future Skyline Skills Commitment' that will launch in October 2025 and will be hosted on the Hub - it is a new employer pledge to boost the number of diverse new entrants.	25-Jun-2025	Chris Oldham	31-Mar-2026
CR30i Supporting London become a centre for transition finance	Finance Council (which was colaunched by Government and the City of London). The Council's aim is to make the UK the best place in the world		25-Jun-2025	Kate Neale	31-Mar-2026

Work is ongoing to review CR33 Major Capital Schemes to ensure it remains aligned with current and emerging contexts.

Risk Code CR33 Risk Title Major Capital Schemes	
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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:**

Description

- 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	Impact		
Risk Score	Likelihood	Impact	
12	Possible	Major	
Amber	Trend	Constant	

Target Risk	Impact		
Risk Score	Likelihood	Impact	
8	Unlikely	Major	
Amber	Target Date	31-Mar-2029	

Original Risk	Impact	
Risk Score	Likelihood	Impact
16	Likely	Major
Red	Creation Date	14-Feb-2020

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.	23-Jun-2025
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A change in approach to the future of the markets has resulted in the cancellation of the Markets Co-location Programme and the	l
initiation of a new Markets Programme. The landlord works at the Museum of London are nearing completion, work on Salisbury Square	l
and the Future Police Estate Programme continues to plan, and the Barbican Renewal Programme has been established with	l
governance arrangements confirmed at P&R (May 2025).	

Risk Level	Corporate
Department	Chamberlain's

Risk Approach	Reduce
Risk Owner	Caroline Al-Beyerty

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
CR33h New Project Governance	Implement a new project governance approach	The Town Clerk's portfolio board commenced in November 2023.	23-Jun-2025	Genine Whitehorne	31-Jul-2025
Approach		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 			
		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	23-Jun-2025	Matthew Miles	30-Sep-2025

		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.			
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.	23-Jun-2025	Matthew Miles	31-Jul-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	23-Jun-2025	Sonia Virdee	31-Mar-2029

		February with a quarterly updated in May. Quarterly monitoring/reporting will continue going forwards. 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.	23-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.	23-Jun-2025	Sonia Virdee; Genine Whitehorne	31-Mar-2029

Risk Code	CR37	Risk Title	Maintenance and Renewal of Corporate Physical Operational Assets (excluding
			housing assets)

Description

Cause: Significant on-going and previously unmet property and renewal maintenance costs across the City's Corporate property portfolio (excluding housing).

Event: Misalignment between funding available and that required by the asset (as defined by the relevant Asset Management Strategy). **Impact**: Built estate becomes not fit for purpose / functions / occupancy. Cost of maintenance and utility costs increases, placing further pressure on City resources. In extreme circumstances there will be H&S implications, leading to potential enforcement action, legal action by tenants or asset failure in whole or part with detrimental effects leading to impact on occupiers.

Current Risk	Impact	
Risk Score	Likelihood Impact	
12	Possible	Major
Amber	Trend	Constant

Target Risk	Inpa Impa	oct
Risk Score	Likelihood	Impact
8	Unlikely	Major
Amber	Target Date	31-Mar-2029

Original Risk	Impact	
Risk Score	Likelihood Impact	
12	Possible	Major
Amber	Creation Date	10-Oct-2019

Latest Note	This risk captures systemic property related risks across the corporate property estate (excluding housing). Under the organisation's property model, accountability for the delivery of mitigating activities lies with the relevant Chief Officer. The City Surveyor, as Head of Profession for Estates and Facilities Management, advises the relevant Chief Officer of their accountabilities with respect to property assets they occupy beyond those assets under the City Surveyor's accountability. The delivery of the Cyclical Works Programme (CWP) is a key mitigation of this risk under the City Surveyor's control. The target date of this risk aligns with the five-year CWP delivery timeframe. It should be highlighted that CWP funding is not attributable to ringfenced property assets (Police estate, New Spitalfields, Billingsgate and the three private schools). The scoring on the impact of this risk has reduced from initial scoring to reflect the agreement of funding of CWP.	19-Aug-2025
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Risk Level	Corporate
Department	City Surveyor's

Risk Approach	Reduce
Risk Owner	Paul Wilkinson

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
CR37a Cyclical Works Programme (CWP)	Cyclical Works Programme (CWP) The Cyclical Works Programme (CWP) is the principal way that the backlog of asset maintenance is delivered to Corporate properties (excluding ringfenced assets).	In March 2024 the Court of Common Council agreed £133m funding to be delivered over five years to support the Cyclical Works Programme (CWP). The focus of this action will be to track the delivery of the CWP in line with programme. The delivery team was established in late 2024 and works have commenced. A progress update was is presented to June 2025 RASC in line with the 6-monthly update programme.	23-May-2025	Peter Collinson; Paul Wilkinson	31-Mar-2029
CR37b Ring fenced budgets	Ring fenced properties and budgets "Ring fenced" properties include the City of London Police estate, New Spitalfields, Billingsgate and the three private schools. These departmental occupiers allocate their own funds for the maintenance of the built assets. Whilst the City Surveyor's Department recommends work to be undertaken, it is the occupying department who holds the budget responsibility and thus decides with final control over maintenance activity.	Ring-fenced property occupiers are accountable for the identification of maintenance and renewal actions. The City Surveyor, as Head of Profession, is able to advise on required works and / or is responsible for delivering agreed maintenance services. Specific property related risks are noted on the relevant departmental/ Institution risk register. The target date for this action is considered as a 'major review' date.		Ben Milligan; Paul Wilkinson	31-Mar-2026
CR37f Annual Major Capital Bids	Annual Major Capital Bids The annual capital bids programme and recommendations (October) are built	There is no funding available for Capital Bids in 2025/26 in all instances apart from emergency circumstances.	04-Apr-2025		31-Mar-2026

	into the subsequent year's organisational budget which is presented to Court Capital bids are only considered where funding is not possible through other funding routes (such as CWP).	Where bids are approved works will need to progress before a material change in the risk scoring will result. The accountability for the development of capital bids lies with the relevant Chief Officer. Support is also provided to occupying departments where they are required to collate their own bids (in-line with the City Surveyor's role as Head of Profession). The City Surveyor's Department presents bids in relation to works at the Guildhall, Walbrook Wharf 3 wholesale markets and the Central Criminal Court. The target date on this risk reflects the annual nature of bidding process.			
CR37g Operational Property Review	an Operational Property Review (OPR) programme to consider the future property requirements to deliver the organisation's services. This will align with the Resource Priority Refresh programme. Where properties are identified as no longer required to deliver City services, alternative uses (or disposal) can be progressed. This will both lower the	The Environment, and Community & Children Services reviews have been completed and the results presented to Members. These initial reviews identified baseline operational requirements, financial position, and state of repair which has enabled the consideration of detailed costed options. This was presented for information to RASC Members in June. Guidance for 2025/26 business planning was issued by the City Surveyor to all Chief Officers to assist in identifying underutilised or surplus assets no longer in use or required for the purpose they were allocated. Through this process there were no surplus assets identified. The department continues to work with Corporate colleagues to address this item, and provided background information to assist with the development of papers for the Policy & Resources Away Day in July.	19-Aug-2025	Judith Finlay; Katie Stewart; Sonia Virdee; Peter Young	31-Mar-2026
CR37h Renewal Programmes	Renewal Programmes	The Barbican Centre renewal project has recently been approved following extensive public workshops and	23-May-2025	David Farnsworth;	31-Mar-2026

	Where appropriate it may be more efficient to wrap up a number of maintenance requirement (both forward and backlog) into a major renewal programme. By their nature these will be far wider in scope and therefore substantial funding is required. Whilst these actions are more uncertain it is useful to track progress as, should they progress, they will make a significant impact on the overall risk.	surveys. Whilst the delivery programme will be over a long time period, interim works (to the value of £25m) have been progressed. The wider transformation programme includes £191m in investment to support the first phase of the Barbican Renewal Programme. This spans five years (2027-2032) and addresses repair and modernisation activity. The Guildhall School of Music and Drama (GSMD) are working closely with corporate colleagues to develop and further the Barbican Renew project. GSMD have also engaged space consultants who are undertaking a wide-ranging review of the site to ensure future needs are captured and future funding bids are aligned. Guildhall renewal has been paused and appropriate sequencing needs to be considered to enable adequate funding to be released. In the interim CWP works (CR37a) are being progressed.		Jonathan Vaughan	
CR37i Maintenance and Renewal	Maintenance and Renewal The regular maintenance and renewal of assets mitigates the risk on an on- going basis. The identification and mitigation of these items is under the accountability of the Chief Officer in occupation.	Under the City of London's operating model, it is the Chief Officer in occupation who is accountable for the identification and mitigation of property related risks within their area of control. This is done with the advice of the City Surveyor as Head of Profession for Estates and Facilities Management. This mitigating action is therefore devolved to all Chief Officers across the organisation, and actions will vary in line with the needs of that individual department. Local risks are captured on individual risk registers and are considered by the organisation's Chief Officer Risk Management Group (CORMG) as appropriate. The target date for this risk action is considered a major review date.	04-Apr-2025		31-Mar-2026
CR37j Head of Profession	The City Surveyor's Department is Head of Profession (HOP) for Estates and Facilities Management. However,	The department engaged with colleagues in HR to better determine the roles and responsibilities under the Head of Profession (HOP). This was with the view that	19-Aug-2025	Cliff Morton; Paul Wilkinson	30-Jun-2026

with organisational HOP have not been defined. Greater definition around this item will provide clarity as to the City	a consistent approach would be delivered across the organisation. It was determined, due to the range of functions under HOP, that such an approach was not appropriate – with further definition around HOP devolved to the HOP themselves.	
	The HOP reflects the organisation's operating model, where the Chief Officer in occupation is accountable for the identification and mitigation for property related risks within their area of control. The City Surveyor, as HOP for Estates and Facilities Management, feeds into this process by providing advice to the relevant Chief Officer.	

Risk Code	CR38	Risk Title	Unsustainable Medium-Term Finances - City's Estate
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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.

Description

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 Reserves. 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	Impact	
Risk Score	Likelihood	Impact
12	Possible	Major
Amber	Trend	Constant

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

Original Risk	Impact	
Risk Score	Likelihood	Impact
24	Possible	Extreme
Red	Creation Date	31-Oct-2022

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	Risk Approach
Department	Chamberlain's	Risk Owner

Risk Approach	Reduce
Risk Owner	Caroline Al-Beyerty

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
	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	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.	23-Jun-2025	Sonia Virdee	31-Mar-2026
	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,	23-Jun-2025	Sonia Virdee; Genine Whitehorne	31-Mar-2026

		Resources away day in July 2025 on income stream across the Corporation.			
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.	23-Jun-2025	Sonia Virdee	31-Mar-2026
CR38g Major Projects	Remain within the financial envelopes approved for major projects.	Monthly updates and budget monitoring on major projects forecasts and issues arising. Projects are	23-Jun-2025	Sonia Virdee	31-Mar-2029

Financial Envelope		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.			
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.	23-Jun-2025	Emily Brennan; Sonia Virdee	31-Mar-2026
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	23-Jun-2025	Sonia Virdee; Genine Whitehorne	31-Mar-2026

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 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.	

Work is ongoing to review CR39 Recruitment and Retention to ensure it remains aligned with current and emerging contexts.

Risk Code CR39 Risk Title Recruitment and Retention	Risk Code	CB30	Risk Title	Recruitment and Retention
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Description

Cause: The Corporation had an employee turnover rate of 18.69% for the period 1 January to 31 December 2022. This is a high and is affected by a wide range of factors including labour market shortages and high levels of employment in the wider economy. Like many employers, the Corporation is competing for scarce talent, particularly in highly skilled areas such professional services.

Event: Unable to attract and retain the best talent due to factors such as remuneration, working conditions and benefits becoming out of line with competitor organisations.

Effect: The corporation is at risk of failing to deliver its corporate objectives. Costs of delivering services increase due to high turnover, and increased reliance on agency workers and interims, particularly in shortage areas. This means our ability to deliver objectives is at risk. This affects both outcomes for policy objectives and statutory functions, as well as the brand and reputation of the organisation.

Current Risk	Impa	ct	
Risk Score	Likelihood Impact		
12	Possible	Major	
Amber	Trend	Constant	

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

Original Risk	Impact		
Risk Score	Likelihood	Impact	
16	Likely	Major	
Red	Creation Date	21-Feb-2023	

		As of 28/08/2025 this risk is being reviewed and monitored. There is need for improved tracking and reporting of data which the ERP	
		system (SAP) will enable us to do. We are working further to review and refine this risk.	28-Aug-202

Risk Level	Corporate	
Department	People and Human Resources	

Risk Approach	Reduce
Risk Owner	Cliff Morton

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
CR39b Ambition 25 Reward Review	Full review of pay, terms and conditions to update working patterns and reward to improve recruitment and retention. Phase 1 completed by April 2023 with options for change. Phase 2 implementation of agreed options for change by Autumn 2025	Good progress is being made across all areas of the project. The Town Clerk & Chief Executive is now the Senior Responsible Officer (SRO) for this Programme. A focused period of engagement with Members, the Executive Leadership Board, SLT, Future Ambition 18, Unions and Staff is planned for the next period.	28-Aug-2025	Cliff Morton	30-Apr-2026
CR39c Alternative Service Delivery models and the Contingent Labour review project		Commencing June 2025, Reed became the provider for the City contingent labour force.	28-Aug-2025	Cliff Morton; Dionne Williams- Dodoo	31-Dec-2025
CR39j Vision and Values	We recognise that having a positive employment brand helps to attract potential candidates.	We have progressed procurement to the next stage. However, the overall project timing remains the same. The programme percentage remains at 35%. This work is to create over-arching values and a culture map to enable City Corporation to undertake related People Strategy work including the prioritisation of supporting initiatives to ultimately embed these values across the full employee lifecycle.	28-Aug-2025		31-Dec-2025
CR39k Staff engagement survey	Our next Our People Survey which will measure staff engagement and provide feedback on working experiences at the City of London will launch on the 15th April 2024. Through the survey we will do the follow: 1, Understand the drivers that are contributing to any potential negative experiences at working at the City.	No further update - nothing else to add at this time.	28-Aug-2025		31-Dec-2025

3, Understand themes and develop action plans that will enable us to position ourselves as the employer of choice. With a view that the summary of	
findings will feed into keeping the People Strategy as a living breathing document.	

Diala Carla	CB40	1 Г.	Dial. Title	Advance Belifical Boundaments
Risk Code	CR10		Risk Title	Adverse Political Developments

Description

Cause: Policy issues that may compromise the City's operation as an international financial marketplace to which the City Corporation's functions are aligned; other financial and professional services issues that make the City Corporation vulnerable to political criticism; local government proposals that (either directly or indirectly) call into question the democratic legitimacy of the City of London Corporation; overarching political hostility.

Event: Changes in international relationships particularly those with the EU or the US; reputational questions related to financial institutions; local government changes in London; low turnout for Common Council elections; increase in political hostility to the Corporation.

Impact: Damage to the Corporation's ability to put its case nationally and internationally and to the City's standing as a dedicated international financial marketplace. Loss of investor confidence in, or attractiveness of, the Square Mile. The City of London Corporation would be compromised if the City's position as a world-leading financial and professional services centre were undermined. Loss of credibility for the Corporation.

Current Risk	Impact		
Risk Score	Likelihood Impac		
8	Unlikely	Major	
Amber	Trend	Constant	

Target Risk	Impact		
Risk Score	Likelihood	Impact	
4	Unlikely	Serious	
Green	Target Date	09-Jul-2029	

Original Risk	Impact	
Risk Score	Likelihood	Impact
8	Rare	Extreme
Amber	Creation Date	

	The risk appetite is assessed on the basis of an assumption as to the Corporation's ultimate constitutional existence in its current form beyond the risk register timeline.	
Latest Note	No change to the risk rating is suggested at this time. The City of London (Markets) Bill continues its progress through Parliament and is currently awaiting its Committee stage.	18-Jul-2025
	Government plans for police reform are being monitored ahead of an expected White Paper later in the year, as are the proposals arising out of the English Devolution White Paper.	

Risk Level	Corporate
Department	Remembrancer's

Risk Approach	Reduce
Risk Owner	Paul Wright

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
CR10a monitoring legislation	Monitoring of Government legislation and proposed regulatory changes.	Constant attention is given to the form of legislation affecting the City Corporation and the broader City, and any remedial action pursued. City Corporation departments will be alerted to issues of potential significance as the measures are introduced.	18-Jul-2025	Paul Wright	09-Jul-2029
		Targeted engagement across the political spectrum will continue on matters that directly impact the City of London, particularly around the City of London (Markets) Bill.			
		Currently among the Bills being considered by Parliament are the English Devolution Bill and the Planning and Infrastructure Bill. Plans to lower the voting age are also being monitored.			
CR10b Provision of information	,	Making known the broad range of work of the City Corporation among opinion formers, particularly in Parliament and central Government, is part of the apparatus by which the City's voice is heard and by which the Corporation is seen to be "doing a good job" for a crucial sector of the economy, and for London (and the nation), across a wide spectrum of activity.	18-Jul-2025	Paul Wright	09-Jul-2029

		The Remembrancer's Parliamentary Team and the Corporate Affairs Team continue to provide updates to the relevant departments and Members following major political developments and set piece Parliamentary events. The most recent event of this nature was the Spring Statement on 26 March. Written submissions have been made to a number of select committee inquiries, notably soft power, built heritage, export-led growth, plant and animal heath, and post-16 education. The Remembrancer's Parliamentary Team also contributes to the tracking of Government consultations and co-ordinating relevant teams to provide responses to relevant consultations.			
CR10c Stakeholder engagement	Engagement with key opinion informers in Parliament and elsewhere. Programme of work to monitor and respond to issues affecting the reputation of the City Corporation.	The Policy Chairman has regular meetings with the MP for the Cities of London and Westminster and liaison with her and other MPs, Peers and Select Committee of both Houses on matters of importance to the City will continue. A parliamentary drop in session focused on the City of London (Markets) Bill took place on 26 February and discussions continue with those petitioning against the Bill. Working with other organisations, including TheCityUK, International Law Committee, LawUK and the Financial Markets Law Committee, to analyse the legal and regulatory framework impacting on the FPS sector. A parliamentary drop in session organised in conjunction with financial services trade associations took place on 25 March.	18-Jul-2025	Paul Wright	09-Jul-2029

The City's Annual Parliamentary Terrace Reception is being scheduled for the new year, and a parliamentary researchers' reception is being planned for the autumn.	
The All Party Parliamentary Group for Financial Markets and Services has been reconstituted and a programme of meetings is underway. The programme for 25/26 will be developed during recess.	
The Remembrancer's Parliamentary Team works closely with Corporate Affairs and the Office of the Policy Chairman over the Policy Chairman's parliamentary engagement programme, including providing content and briefing for bilateral meetings. An engagement plan for the Policy Chairman has been developed in close collaboration with the Corporate Affairs team.	

Description

Risk Code CR29	Risk Title	Information Management
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Cause: Lack of officer commitment and investment of the right resources into organisational information management systems data and a data driven culture.

Event: The City Corporation's Digital, Data and Technology Strategy (2024-2029), IM Strategy (2018-2023[SK1] [CS2] [SK3]) is not fully and effectively implemented

Effect: a) Not being able to use relevant information to draw insights and intelligence and support good decision-making. b) Vulnerability to personal data and other information rights breaches and non-compliance with possible significant ICO fines or other legal action. c) Waste of resources storing information data beyond usefulness.

Current Risk	Impact		
Risk Score	Likelihood	Impact	
8	Unlikely	Major	
Amber	Trend	Constant	

Target Risk	Impa	ct		
Risk Score	Likelihood	Impact		
6	Possible	Serious		
Amber	Target Date	31-Mar-2025		

Original Risk	Impac	Impact		
Risk Score	Likelihood	Impact		
24	Possible	Extreme		
Red	Creation Date	08-Apr-2019		

Latest Note

CR29 (Information Management) was first raised in April 2019, and since that time significant progress has been made in the management of both Information and Data. When the Risk was first raised there was a lot of focus on Information Management, which resulted in the creation of an Information Management Strategy, Local Information Manager Network and the implementation of sensitivity labelling and retention labels for files across the COL Estate. Since that time, the focus has moved onto Data and this work has been progressed through the Data Maturity Review, facilitated by Hitachi Solutions. There has been good progress against the main recommendations of the review, principally the implementation of the Corporate Data Platform, the implementation of a Corporate CRM Solution and a review of Data Governance. These workstreams will continue to be delivered with oversights from the Director of DITS and the Assistant Director for Digital and Data. As such, it is recommended that this Risk can be downgraded to a Departmental Risk. Awaiting outcome of CORAG

14-Aug-2025

Risk Level	Corporate
Department	Chamberlain's

Risk Approach	Reduce
Risk Owner	Caroline Al-Beyerty

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
CR29o Review Data Governance	Review Data Governance	Working with colleagues in the Corporate Strategy and Data Team to review Data Governance and work with departments to implement effective data governance and data quality management. An initial report has been conducted against the Corporation's most significant datasets received and is under review. A Purview Workshop was also recently held with Phoenix which emphasised an initial focus on Data Loss Prevention, Retention and Sensitivity Labelling. The latter two have been configured for use but with limited adoption to date. The purview workshop has clarified the need to focus on retention policies and sensitivity labelling which will be the basis of a campaign to be run in 2025, subject to capacity.	14-Aug-2025	Sam Collins	30-Sep-2025
CR29p Deliver Data Lighthouse Project (Corporate CRM)	Deliver Data Lighthouse Project (Corporate CRM)	Following the POC, detailed requirements have been documented, are being gathered and a sandbox environment has been created to allow key stakeholders access to Customer Insights. A Customer Insights specialist has been appointed and is making progress in the iterative development of the new platform, which will go live with two key departments, before being rolled out further. Conservative estimates are for a Go Live of December, although this may be able to be brought forward. Once requirements are fully documented and approved, implementation on the live environment will commence.	14-Aug-2025	Sam Collins	31-Dec-2025
CR29q Data	Data	Data quality is poor across the organisation, leading to delays in key projects and programmes, as well as not allowing the organisation to make strategic data-driven decisions. In addition, data is fragmented across the organisation, and there isn't a central repository.	08-Jul-2025	Zakki Ghauri	31-Dec-2025