

City of London Corporation Committee Report

Committee(s): Audit and Risk Management Committee – For Information	Dated: 17/11/2025
Subject: Risk Management Update	Public report: For Information
This report supports the successful delivery of all six Corporate Plan outcomes and our statutory obligations through identifying and managing risks in line with our business objectives.	Corporate Risk Management
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	Dionne Corradine, Chief Strategy Officer
Report author:	Olivia Plunkett, Corporate Strategy Officer

Summary

This report provides the Committee with an update on City of London Corporation's risk management, including the corporate and top red departmental risk registers, since last reported to the Committee in September 2025. Further details can be found in the appendices listed at the end of this report.

Recommendation(s)

Members are asked to note:

- This report and the corporate and top red departmental risk registers summaries contained within this report and attached at Appendices 1 and 2 respectively.
- That since the previous update:
 - The number of corporate risks has decreased from 13 to 12 with two risks de-escalated to departmental level and one risk escalated from departmental level.¹
 - The number of departmental red risks has decreased from 16 to 15, with one risk escalated to corporate level.²

¹ **Risks de-escalated:** CR39 Recruitment and Retention and CR29 Information Management. **Risk escalated:** CR42 Housing Revenue Account Financials (formerly CHB002).

² **Risk escalated to corporate level:** see above.

Main Report

Risk Activity – Process and Culture

1. Progress continues on implementing the updated risk appetite approach, with relevant service committees now beginning to define appetite levels for their respective corporate risks. As these are set, they will be included in the risk appetite annex. From January 2025 these assessments will be collated and analysed collectively in our risk management reporting to provide this Committee with a clear overview of our risk appetite landscape. Additional detail is provided in non-public Appendix 3.
2. Work to mature our corporate risk register and ensure it is aligned with our current context and objectives has been prioritised during this period. As part of this a number of corporate risks have been revised, de-escalated or created (see para 9 to 12). These changes seek to ensure we have more relevant mitigations and consider any cross-cutting themes (e.g. legal) and have greater strategic applications.
3. We continue to explore opportunities to strengthen and expand our risk management processes to enable more holistic discussions, taking into account range of risks and medium/long-term outcomes. This work is being advanced through engagement with colleagues, including the Risk Management Forum Working Group, to explore the potential application of a risk universe model.³ In addition, we are supporting risk thinking connected to key enabling processes, such as business planning and the transition to multi-year plans. Our evolving reporting approach is designed to both drive and be shaped by this engagement.
4. City Corporation is committed to sharing best practice and fostering a learning mindset in risk management. As an outcome of previous work with Bayes Business School, the Chief Strategy Officer will attend the launch of the Chief Risk Officer Network, an invitation-only gathering from across the City of London's financial services sector. Hosted by the Rt Hon the Lord Mayor of London, Alderman Alastair King, the CRO Network will be formally launched on Tuesday, 4 November 2025.

Current Position

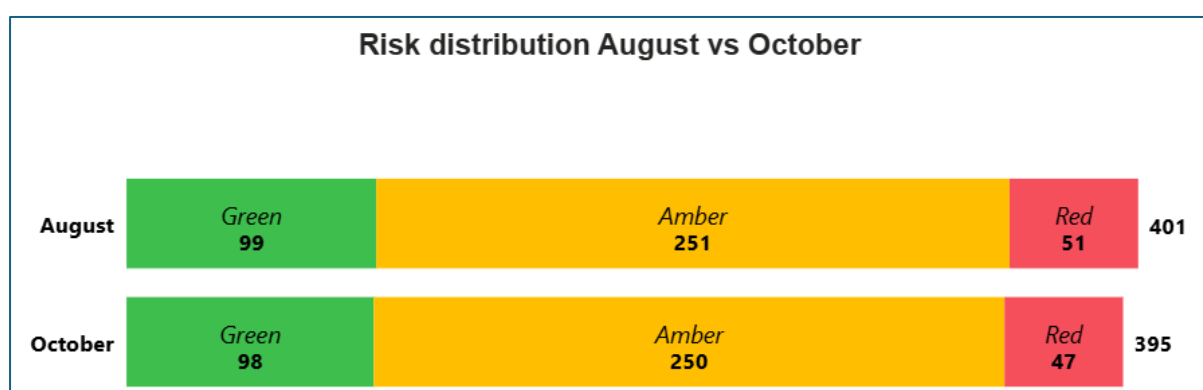
5. The corporate and red departmental risks are reported to this Committee as a minimum on a quarterly basis to enable the Committee to exercise its role in the monitoring and oversight of risk management within the City of London Corporation (CoLC). The Committee received a full corporate risk register at their September meeting. A summary table of the Corporate Risks can be found at para 15, a detailed report of corporate risks that have been updated during this period is available in appendix 1 and a summary report of the red departmental risks is at Appendix 2.

³ A **risk universe** sits above the risk register, **creating space to identify and record all risks** regardless of their management status.

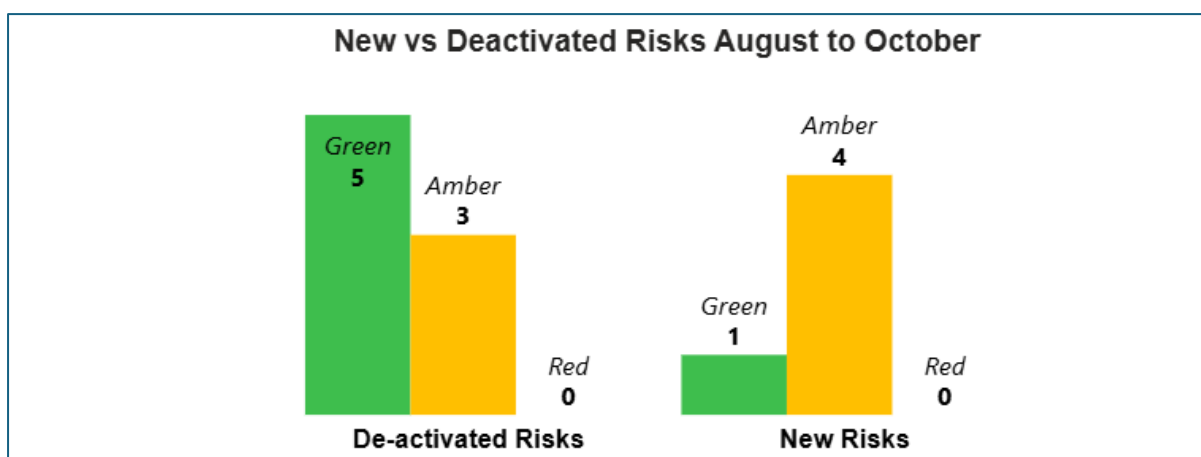
6. The corporate and red departmental risk registers were reviewed by the Chief Officer Risk Management Group (CORMG) on 16 October 2025 as Senior Officers responsible for overseeing CoLC risk management actions, decisions and outcomes (including consideration of developing risk areas and cross-corporation risk management themes) on behalf of the Executive Leadership Board. This meeting CORMG had a strong focus ensuring the corporate risk register is reflective of current internal and external context, and aligned to our strategic outcomes. This focus in conjunction with the activities outlined in paragraph 2 led to some movement within the corporate risk register during this period.
7. We remain committed to maintaining a dynamic and regularly updated risk register. During this reporting period, risks that have been managed or finalised have been removed, and newly identified risks have been added. Additionally, the register continues to be refined, with duplicate or legacy incomplete entries being cleared - these removals are not reflected in the deactivation table below (Table 1) but are captured within the overall risk distribution (Graphic 1).

		Deactivated risks	New risks
By RAG rating	Red	0	0
	Amber	3	4
	Green	5	1
	Total	8	5
By Risk Level	Departmental	3	2
	Service	5	3
	Programme	0	0
	N/A	0	0

Table 1: August – October: New vs Deactivated risks by RAG rating and Risk level



Graphic 1: August vs October 2025: Overall Risk Numbers by RAG Rating on Ideagen



Graphic 2: August - October 2025: New vs Deactivated Risks by RAG Rating on Ideagen

Corporate risks

8. There are currently 12 corporate risks on the corporate risk register (4 Red and 8 Amber). Since the last report to the Committee two risks de-escalated to departmental level and one risk escalated from departmental level. Risk appetite for corporate risks is outlined in appendix 3.
9. *CR39 Recruitment and Retention* has been de-escalated from a corporate to a departmental level risk following CORMG approval in October 2025. The Chief People Officer advised that this is no longer a risk at a corporate level for the City Corporation and should be managed as part of routine HR and departmental oversight (localised retention issues will be managed in this way). A new corporate risk related to people is being developed to reflect the current context and the Chief People Officer is attending A&RMC to provide an update.
10. CORMG additionally approved the de-escalation of *CR29 Information Management* at their October meeting following the completion of mitigating actions addressing the original risk. The creation of a new risk that reflects current challenges in this space/in the data/information is also being explored with the aim to present to CORMG in quarter 4.
11. *CHB 002 Housing Revenue Account Financials Red 16* (3 likely x 4 major) has been escalated from departmental level and is now on the corporate risk register as CR42 following CORMG approval in October. This reflects the pivotal nature of the risk and the need for decisive changes to ensure its sustainability and effective delivery. Additional mitigations are being implemented aiming to strengthening its financial position and operational effectiveness.
12. Work has been ongoing to ensure that corporate risks remain aligned with current and emerging contexts. As such:
 - a. *CR02 Loss of Business Support* has been revised to *CR02 City Corporation's role in promoting UK FPS* to realign the risk with the Corporation's objective to drive economic growth and to champion UK FPS. The risk score has been decreased from **Amber 12** (4 major x 3

possible) to **Amber 6** (4 major x 3 possible) and the target score decreased to **Green 4** (2 serious x 2 unlikely). New mitigations are being implemented to support the new direction.

- b. *CR33 Major Capital Schemes* has been updated to *CR33 Project portfolio strategic impact and/or financial value*. All projects are now subject the new corporate portfolio management approach, and the scope of CR33 has been widened to reflect this. Current scoring of **Amber 12** (3 possible x 4 major) and target of **Amber 8** (2 unlikely x 4 major) unchanged from the previous iteration.

13. The RAG matrices below show the distribution of corporate risks as of 27 October 2025 (Table 3) and 28 August 2025 (Table 4):

	Minor	Serious	Major	Extreme
Likely			2	
Possible		1	6	1
Unlikely			1	1
Rare				

Table 3: October 2025 Corporate Risk Heatmap

	Minor	Serious	Major	Extreme
Likely			1	
Possible			8	1
Unlikely			2	1
Rare				

Table 4: August 2025 Corporate Risk heatmap

14. The highest scoring corporate risk is *CR16 Information Security* at **Red 24** (Impact 8 Extreme x Likelihood 3 Possible). Actions to mitigate this risk are ongoing, with recent activity including the implementation of a 24/7 Security Operations Centre, bringing security services in-house, giving greater control over, and visibility of, security controls. An external partner with Cyber Security expertise has been appointed to advise on the optimal setup of an internal Cyber Team which will work across the wider organisation including Institutions to ensure the continued safety of City Corporation. Additional training needs are being reviewed and implemented. The risk appetite level was set at the September Digital Services Committee (see Appendix 3 for more details).

15. Table 5 below shows a summary of all CoLC corporate risks as of 27 October 2025:

Code	Title	Likelihood	Impact	Current Score	Rating	Date Reviewed	Target Score	Target Date	Trend since last review	Risk Approach
CR16	Information Security (formerly CHB IT 030)	Possible	Extreme	24	Red	13-Oct-2025	16	31-Oct-2025	Constant	Reduce
CR35	Unsustainable Medium-Term Finances - City Fund	Likely	Major	16	Red	20-Oct-2025	8	31-Mar-2026	Constant	Reduce
CR36	Protective Security	Unlikely	Extreme	16	Red	30-Jul-2025	16	31-Jul-2026	Constant	Accept
CR42	Housing Revenue Account Financials (formerly CHB 002)	Likely	Major	16	Red	17-Oct-2025	8	30-Mar-2026	Constant	Reduce
CR01	Resilience Risk	Possible	Major	12	Amber	03-Oct-2025	8	31-Jan-2026	Constant	Reduce
CR09	Health, Safety and Fire Risk Management System	Possible	Major	12	Amber	14-Oct-2025	4	29-Mar-2029	Constant	Reduce
CR30	Impact of Climate Change	Possible	Major	12	Amber	29-Aug-2025	6	31-Mar-2027	Constant	Reduce
CR33	Project portfolio strategic impact and/or financial value	Possible	Major	12	Amber	17-Oct-2025	8	31-Mar-2029	Constant	Reduce
CR37	Maintenance and Renewal of Corporate Physical Operational Assets (excluding housing assets)	Possible	Major	12	Amber	19-Aug-2025	8	31-Mar-2029	Constant	Reduce
CR38	Unsustainable Medium-Term Finances - City's Estate	Possible	Major	12	Amber	30-Sep-2025	8	31-Mar-2026	Constant	Reduce
CR10	Adverse Political Developments	Unlikely	Major	8	Amber	18-Oct-2025	4	09-Jul-2029	Constant	Reduce
CR02	City Corporation's role in promoting UK FPS	Possible	Serious	6	Amber	17-Oct-2025	4	31-Mar-2027	Decreasing	Reduce

Table 5: October 2025: List of Current Corporate Risks by Current Risk Score

Red Departmental Risks

16. There are currently 15 departmental red risks. Since the last report to the Committee one risk escalated to corporate level (see paragraph 11). There are no further changes to report.

Corporate & Strategic Implications

Strategic implications – Reporting in line with CoLC Corporate Risk Management Strategy.

Financial implications – Transformation fund investment received to engage Gartner over two years to support advancement of our work on Risk Culture.

Resource implications – None applicable

Legal implications – None applicable

Risk implications – None applicable

Equalities implications – None applicable

Climate implications – None applicable

Security implications – None applicable

Conclusion

17. This risk update and accompanying document (see appendices) are aimed at providing assurance to the Audit and Risk Management Committee that risks within the City of London Corporation are being effectively handled.

Appendices

- Appendix 1: Updated Corporate Risks detailed report
- Appendix 2: Red departmental risks summary report
- Appendix 3: Risk Appetite Update – Non-public

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Corporate Strategy Officer