

City of London Corporation Committee Report

Committee(s): Audit and Risk Management Committee – For Information	Dated: 12/01/2026
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

Since the last report to Committee in November 2025, the City Corporation has continued to advance its risk management framework through the implementation of a new risk appetite approach, with most corporate risks now assigned appetite levels. Delivery of the Risk Management Strategy progressed during this time through enhancing organisational understanding via extended leadership engagement, aligning risk with enabling activities across the organisation, development of a 'risk universe' for the next financial year and expanding resources, such as Gartner licences and intranet tutorials. The detailed corporate and summary top red departmental risk registers summaries are attached at Appendices 1 and 2 respectively. Risk appetite for corporate risks is outlined in Appendix 3.

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. Risk appetite for corporate risks is outlined in Appendix 3.
- That since the previous update:
 - The number of corporate risks has remained at 12 with no score changes.
 - The number of departmental red risks has remained at 15 with no score changes.
 - Only one corporate risk remains to have risk appetite set.

Main Report

Risk Activity – Process and Culture

1. Progress is ongoing to implement the new risk appetite approach. Each corporate risk has been assigned an appetite level by the relevant service committee, with one remaining to be completed by the end of January 2026. An overview of the current risk appetite landscape is provided in Appendix 3 (non-public).
2. We continue to strengthen risk management knowledge across the City Corporation. The latest Chief Officer Risk Management Group (CORMG) meeting was extended to the Executive Leadership Board to focus on risk appetite analysis and reporting, the understanding of which is critical to achieving corporate outcomes. Chief Officers also discussed updates to the corporate risk register (see para 13) and Audit and Risk Management Committee feedback.
3. Bespoke training is being developed for Chief Officers and Heads of Profession. Risk management resources have been expanded for colleagues through provision of Gartner General News and Insight Licenses to strengthen cross-functional understanding and capabilities. Combined with CoLC intranet video tutorials and guides, this reflects our commitment to building a comprehensive and accessible risk management knowledge hub.
4. Work is ongoing to address issues vs risks, with development and delivery (next financial year) of the new 'risk universe' approach. The current focus ensures corporate risks meet organisation needs, including highlighting and developing new risks as required continues (see para 13).
5. To ensure consistent implementation and alignment of risk management with other functions, we have reviewed draft business plans, sharing risk guidance and monitoring Ideagen. We are also engaging with the Portfolio/Project Management Team to ensure CORA software aligns with the City Corporation's corporate risk framework.

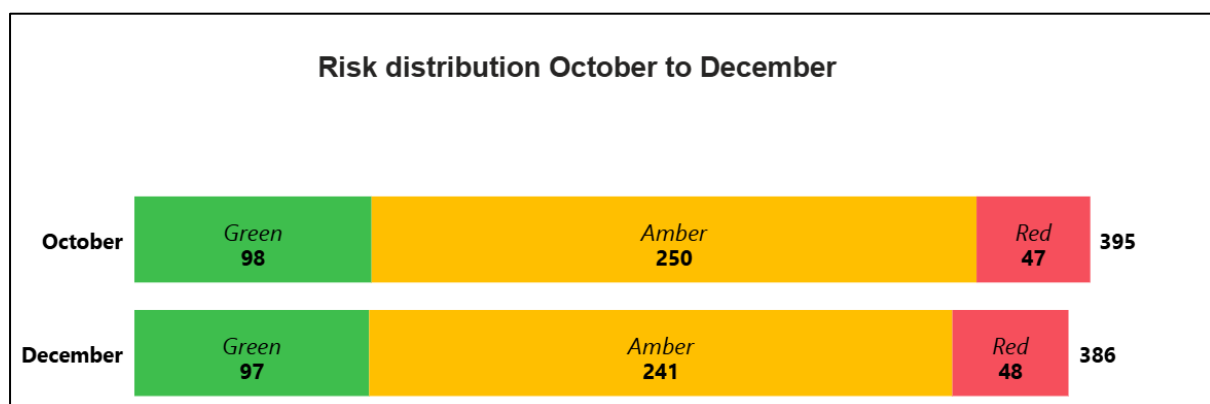
Current Position

6. 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).
7. The corporate and red departmental risk registers were reviewed by the CORMG and the Executive Leadership Board on 24 November 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).
8. 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,

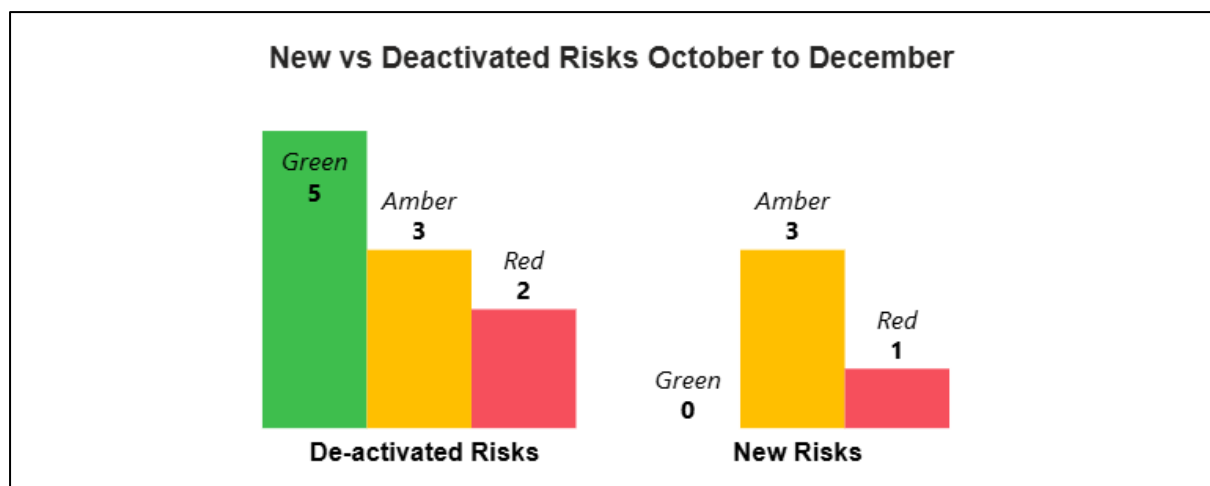
the register continues to be refined, with duplicate or legacy incomplete entries being cleared - these removals are not reflected in the deactivation table below (Table 1) but are captured within the overall risk distribution (Graphic 1).¹

		Deactivated risks	New risks
By RAG rating	Red	2	1
	Amber	3	3
	Green	5	0
Total		10	4
By Risk Level	Departmental	4	1
	Service	6	3
	Programme	0	0
	N/A	0	0

Table 1: October – December 2025: New vs Deactivated risks by RAG rating and Risk level



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

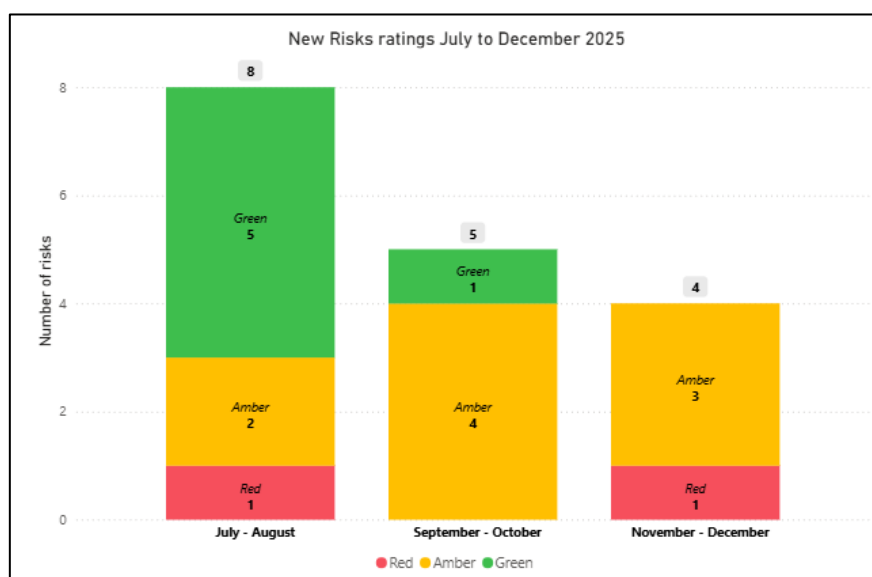


Graphic 2: October – December 2025: New vs Deactivated Risks by RAG Rating on Ideagen

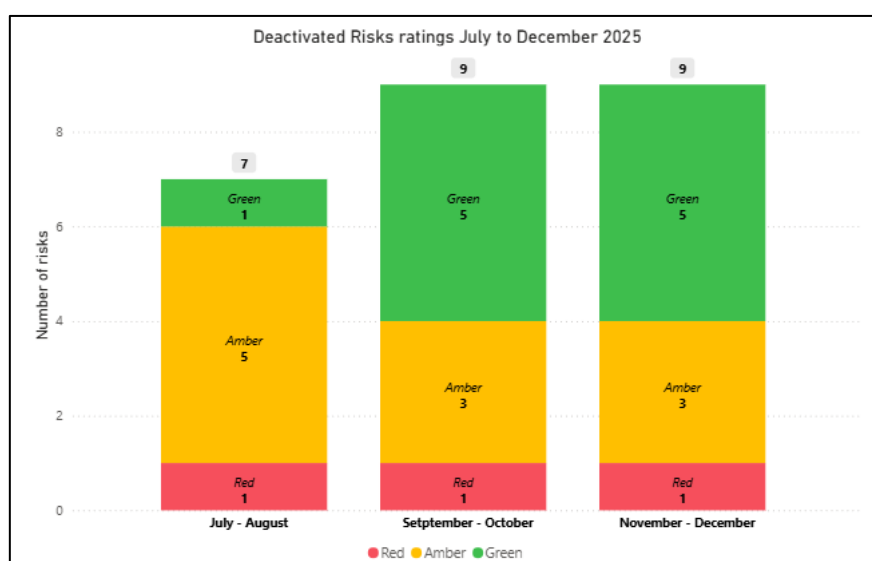
9. Graphic 3 and 4 below, demonstrates tracking of new vs deactivated risks from July to December 2025. The risk register is typically seeing a roughly equivalent number of amber and red risks moved on and off the register, with green risks

¹ While most risks are deactivated (remaining in the background of the system) for audit purposes, some risks are deleted and completely removed from the system including risks that were incorrectly uploaded or uploaded in duplicates. The difference between the deactivated and deleted risks creates the slight misalignment between table 1 and graphic 1.

often deactivated at a higher frequency than they are added. As our risk reporting continues to iterate, further methods of measuring and demonstrating risk activity will continue to be added, including the development of risk score change tracking across all levels.



Graphic 3: New risks July to December by RAG Rating on Ideagen



Graphic 4: Deactivated risks July to December by RAG Rating on Ideagen

Corporate risks

10. There are currently 12 corporate risks on the corporate risk register (4 Red and 8 Amber). There have been no score changes to any corporate risks since the last report to the Committee. A detailed report of all corporate risks can be found in appendix 1 and risk appetite for corporate risks is outlined in appendix 3.
11. The RAG matrices below show the distribution of corporate risks as of 29 December 2025 (Table 3) and 27 October 2025 (Table 4):

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

Table 3: December 2025 Corporate Risk Heatmap

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

Table 4: October 2025 Corporate Risk heatmap

12. The highest scoring corporate risk is *CR16 Information Security* at **Red 24** (Impact 8 Extreme x Likelihood 3 Possible). Alongside ongoing mitigation efforts, this risk and others related to our data landscape are being reviewed more broadly (see para 13 for details).
13. Work has been ongoing to ensure that corporate risks remain aligned with current and emerging contexts. Priority areas for review and revision to the corporate risk register in Q4 are:
 As reported verbally to the Committee at the November meeting:
 - a) *CR16 Information Security* is being clarified to ensure the risk is appropriately framed for cyber security and the mitigations captured.
 - b) Work continues to update HR risks, including drafting a new Corporate Risk relating to change management.
 Separately, following the CORMG meeting in November:
 - c) Further work is being carried out on a wider data corporate risk to ensure that risks to this area are identified and managed at the right level.
 - d) *CR37 Physical Assets* is being reframed to focus on operating model, funding, and prioritisation.
 - e) A risk to explore a potential cross-cutting gap for organisational effectiveness is being drawn up for discussion and review by CORMG.
14. CORMG reviewed whether a corporate-level EEDI risk was required. The group was assured that the Corporate EEDI function is stable with the Head of Profession having oversight across the City Corporation and Institutions. Robust mitigations are in place with local and functional EEDI risks managed at departmental level. There was agreement that EEDI should continue to be used as a lens to consider all risks.
15. *CR42 Housing Revenue Account Financials* was discussed at the December Finance Committee and work is ongoing to ensure that the risk and associated mitigations effectively address the key challenges and threats including commissioning an efficiency review and exploring other funding options.

16. Table 5 below shows a summary of all CoLC corporate risks as of 29 December 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	11-Dec-2025	16	31-Oct-2026	Constant	Reduce
CR35	Unsustainable Medium-Term Finances - City Fund	Likely	Major	16	Red	19-Dec-2025	8	31-Mar-2026	Constant	Reduce
CR36	Protective Security	Unlikely	Extreme	16	Red	11-Dec-2025	16	31-Jul-2026	Constant	Accept
CR42	Housing Revenue Account Financials (formerly CHB 002)	Likely	Major	16	Red	19-Dec-2025	8	30-Mar-2026	Constant	Reduce
CR01	Resilience Risk	Possible	Major	12	Amber	12-Dec-2025	8	31-Jan-2026	Constant	Reduce
CR09	Health, Safety and Fire Risk Management System	Possible	Major	12	Amber	12-Dec-2025	4	29-Mar-2029	Constant	Reduce
CR30	Impact of Climate Change	Possible	Major	12	Amber	13-Nov-2025	6	31-Mar-2027	Constant	Reduce
CR33	Project portfolio strategic impact and/or financial value	Possible	Major	12	Amber	19-Dec-2025	8	31-Mar-2029	Constant	Reduce
CR37	Maintenance and Renewal of Corporate Physical Operational Assets (excluding housing assets)	Possible	Major	12	Amber	12-Dec-2025	8	31-Mar-2029	Constant	Reduce
CR38	Unsustainable Medium-Term Finances - City's Estate	Possible	Major	12	Amber	19-Dec-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: December 2025: List of Current Corporate Risks by Current Risk Score

Red Departmental Risks

17. There are currently 15 departmental red risks. Since the last report to the Committee there have been no changes (additions, escalations or de-escalations) to the red risks on the register, nor any score change to the risks. A summary of red departmental risks can be found in appendix 2.

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

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

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