
















West Oxfordshire District Council Strategic Risk Register
Nov-24

ID	Risk Title	Description of risk / opportunity / Impact	Corporate Objective	Date raised	Risk Owner	Initial Risk			Existing Control, Mitigation or Contingency	Previous		Current		Change in residual risk since previous review	Follow on Action (if required)	Target delivery date	Risk Acceptance Level	Update comments	Status: Open, Hold, or Closed	Direction of Travel since previous review)	
						Impact category	Likelihood category			Impact category	Likelihood category	Score	Impact category								Likelihood category
Internal Risks																					
IR 1	Financial Stability of WODC	There is a risk that the Council's finances become unsustainable. The future funding available to the Council remains extremely uncertain and the Council is particularly exposed to pending changes to retained business rate growth and new homes bonus income. Commercial income streams are also subject to some volatility. There are also significant cost pressures as a result of inflation. The Council's General Fund Balance is currently healthy but will fall below minimum levels without further action, as set out in the Medium Term Financial Strategy (MTFS).	Working Together for West Oxfordshire	1/5/2023	Finance Director S151	Extreme	Probable	20	General Fund Reserves are currently healthy. 23/24 Budget updated to include known cost pressures. Budget monitoring in place throughout the year. Budget setting for 24/25 to identify additional opportunities and pressures. A Transformation Group has been established to drive further efficiencies forward.	Major	Probable	16	Major	Probable	16	0	Continued in year budget monitoring and reporting. The 24/25 Budget approved with an updated MTFS reviewed by Executive and Council. Review of earmarked reserves. Further consideration of options - particularly in areas of Waste, Leisure, Homelessness and Asset Management with a view to bridging the financial gap identifies within the MTFS. In addition, more member training to be considered to increase profile of budgetary challenges.	Ongoing	Risk Reduction	Open	
IR 2	GDPR / Information Management	If the council is not compliant with the General Data Protection and does not have robust processes in place for Information Management then there is a risk of financial penalties, reputational damage and impact on resources	Working Together for West Oxfordshire	1/5/2013	AD Business Services (PM)	Major	Probable	16	Policies and procedures in place for Data Protection Compliance Data Protection Officer and team in place. ICT systems compliant with Data Protection with PSN accreditation / cyber essentials Mandatory training for all staff Data Protection Privacy notices in place. Data sharing agreements in place Data breach processes in place	Major	Possible	12	Major	Possible	12	0	All emails received from at risk location are quarantined and inspected by ICT staff before being released. New cyber security software installed. See also risk P5 on cyber security. 98% of staff now trained in cyber awareness and final 2% being reviewed. PSN renewal underway, and paperwork to be submitted this month. New data protection training is currently being rolled out to all staff. This is a mandatory course and it is also intended to roll it out to Members We are in the process of interviewing for a new Governance Officer to support data protection.	Ongoing	Risk Reduction	Open	
IR 3	Health & Safety	If the council and its contractors / partners are not compliant with the Health & Safety at Work Act, it is at risk of a serious Health & Safety incident / accident leading to financial penalties, reputational damage and risk to services.	Working Together for West Oxfordshire	30/8/2023	AD Business Services (PM)	Major	Possible	12	Health & Safety business partner in place to monitor compliance for Publica, with H&S Board and audit / inspection process. New H&S policy in place for Publica. Ubico have specialist H&S Officers and hold ISO45001, the highest level of H&S compliance. Services delivered by Council and Publica are low risk, highest risk is services contracted to Ubico where H&S is paramount.	Major	Remote	8	Major	Remote	8	0	Health & Safety Board in place to monitor compliance and report back to the Shareholder. Accidents and incidents remain low. Ongoing service area H&S internal audits being undertaken to ensure compliance	Ongoing	Risk Sharing	Open	
IR 4	Legislative Compliance	If the Council and its contractors / partners is not compliant with relevant legislation, it is at risk of not meeting its statutory duty, reputational damage and financial impact	Working Together for West Oxfordshire	30/8/2023	Monitoring Officer	Moderate	Possible	9	Individual ADs and BMs responsible for Legal compliance within their respective areas with an annual declaration in place to monitor compliance. Audit process in place to check compliance. Service areas receive updates on legislation for their service areas. Review of legal services being completed.	Minor	Possible	6	Minor	Possible	6	0	Work ongoing to ensure we remain compliant with current legislation and future legislation. Annual Manager declaration completed with no concerns raised. Legislation which is changing this year, such as the procurement regs are captured in the AGS Action Plan.	Ongoing	Risk Reduction	Open	
IR 5	Shareholder Review of Publica	The review of Publica by Human Engine commissioned by the four shareholder Councils has been published at Cabinet with a recommendation to in-source the majority of services. This is subject to a detailed transition plan and financial costings. Staff have been informed through a briefing prior to the recommendation being published. If the detailed transition plan is not published soon providing assurance to those impacted by the decision, there is a risk that service delivery could be impacted due to loss of staff, inability to recruit, and low staff morale. If detailed costings are not undertaken, there is a risk that in-sourcing the services could increase the cost of delivery and not achieve savings / efficiencies.	Working Together for West Oxfordshire	31/8/2023	CEO (GH)	Moderate	Possible	9	Report requires: A detailed transition plan to be developed for subsequent agreement by Cabinet and Council. Further due diligence to fully understand the financial implications of the recommendation in the short and long term.	Moderate	Probable	12	Moderate	Probable	12	0	The Detailed Transition Plan was approved by WoDC and other partner councils. Formal consultation with employees transferring was completed, with the transfer taking place on 1/11/24. Work currently ongoing on the payroll and business world setup ahead of payday on 20/11. Work now commencing on reviewing potential services for transfer under phase 2. This is more complex due to fragmentation of the service. Separate Strategic Risk Register in place for the Transition.	Ongoing	Risk Reduction	Open	

External Risks																			
ER 1	Cyber Attack	If the ICT network is not adequately protected then it is susceptible to a Cyber - Security Attack leading to loss of systems and data, significant downtime, reputational damage and impact on service delivery and resources	Working Together for West Oxfordshire	1/5/2013	AD Business Services (PM)	Extreme Probable	20	Blocking of USB and other devices. PSN compliance. Revised policies. Staff awareness training. Business Continuity Plan in place, reviewed and tested. Enhanced encryption software and other specialist cyber tools. Investment in cyber training for the ICT Team and specialist officer/s in post. Cyber Essentials re- accreditation submitted. Ongoing network Internal & External Penetration checks. Continual Password Audits across our network to evaluate weak password. Detailed review of Business Continuity & Disaster Recovery Plans in light of recent cyber attack on neighbouring council.	Major Probable	16	Major Possible	12	-4	98% of staff now trained in cyber awareness and final 2% being reviewed, this will be followed by Phishing emails to test understanding and awareness following the training. Ongoing investment in cyber team with dedicated team now in place. Regular review of User Privileges and Information Asset Register. Cyber updates being presented to Council Audit & Governance committees, Publica Audit & Risk Committee (ARAC) and Governance Meetings. Preparation underway to submit latest PSN submission. Risk was increased to reflect recent cyber attack at Tewkesbury Council. ICT team worked closely with Tewkesbury on the response and recovery and are taking any learning back to our systems. Now this has been mitigated, the risk has returned to previous levels.	Ongoing	Risk Reduction		Open	
ER 2	Global Pandemic	If there was another global pandemic, then there is a risk to the delivery of council services due to lack of resource availability, impacting on costs and reputation	Working Together for West Oxfordshire	1/7/2023	CEO (GH)	Moderate Possible	9	New risk to replace Covid specific risks, as Covid is now BAU. Lessons learnt from previous pandemic, Council and partners are now setup to work remotely and able to continue to deliver services in the midst of a pandemic. There is an effective framework in place with Oxfordshire partners.	Moderate Possible	9	Moderate Possible	9	0	Watching brief should a further pandemic be predicted	Hold	Risk Acceptance & Retention		Hold	
ER 3	Fraud & Corruption Risk	If the Council does not have controls, checks and measures in place when commissioning and procuring goods, works and services, there is a risk of fraud and / or corruption which may impact on cost, reputation, and services.	Working Together for West Oxfordshire	7/11/2023	CEO (GH)	Major Probable	16	Counter Fraud and Enforcement Unit (CFEU) in place to manage Fraud and Corruption and ensure that the Council and its employees understand the risks and have controls, checks and measures in place to mitigate this activity. CFEU report to the Council's Audit and Governance Committee. Employees receive regular training. CFEU test controls to ensure fit for purpose	Moderate Possible	9	Moderate Possible	9	0	CFEU currently developing service risk registers for fraud to further improve awareness and controls. Any changes to processes / controls will be monitored / managed for any services which may transition from Publica to direct Council delivery.	Ongoing	Risk Reduction		Open	
ER 4	Refugees / Asylum Seekers	If there is an increase in refugees / asylum seekers into the District, the Council may need to find alternative accommodation which may impact on the Council in terms of an increased demand on housing support and services. There is a risk of disorder / disruption and increase in community tension around the placement of refugees / asylum seekers	Working Together for West Oxfordshire	28/10/2023	AD Business Services (PM)	Moderate Probable	12	Migrant hotels are currently in place, however, this may be changing which may have an impact on housing support and services.	Moderate Probable	12	Moderate Possible	9	3	WoDC is working with Cottsway Housing to provide additional properties using the LA Housing Fund from the Home Office. Numbers are decreasing as families move into private rented accommodation, social housing or return to their home country. No additional demand expected currently from ARAP/ACRS. New cohorts of refugees is BAU. Monitoring potential risk of increased homelessness if asylum seekers granted permission to remain. This risk was increased to reflect the recent unrest. During this time, TVP and MOD along with companies that run housing revived security arrangements. TCGs were stood up to monitor and manage current tensions being seen across the country. Risk has been reduced, to reflect that the unrest is now under control.	Ongoing	Risk Reduction	<i>Risk updated and increased to reflect current UK wide tensions.</i>	Open	

Strategic Risks																			
SR 1	Major Civil Emergency	District Councils are required to provide rest centres for the Public during a Civil Emergency. If staff are unwilling to come forward and volunteer with the running of a rest centre, there is a risk that the Council will be unable to fulfil its duty in providing a safe rest centre. If the Council is unable to provide a sustained response to a major civil emergency, the Council would be failing in fulfilling its statutory duty to assist and care for those affected.	Working Together for West Oxfordshire	1/1/2021	BM for Emergency Planning (CS)	Major Possible	12	Emergency planning team in place. Emergency Planning Process in place, with defined roles and responsibilities. Staff trained in their roles. 24/7 callout in place. Ongoing work with the Local Resilience Forum.	Major Probable	16	Moderate Probable	12	4	WoDC Coordination Team and Rest Centres teams now in place, which is then supported by wider shared resource across Publica. Refresh Training setup for Coordination Team, Rest Centre Team and Duty Officers and Managers. All documentation being updated and transferred to 365. Plans tested during recent floods when Tactical Coordinating Group (TCG) and Strategic Coordinating Group (SCG) stood up. The transition of services has impacted on the 365 emergency cover arrangements. A proposal has now been approved by the Senior Leadership Team which will move cover to a locality based arrangement, with remuneration. Work is now underway to recruit to a locality based team with a target date for implementation of 1/04/25. A s113 arrangement is in place across the three partner councils from 1/11/24. Risk reduced to reflect the agreement of a short and long term solution.	Ongoing	Risk Reduction	Difficult to reduce as likely to be caused by natural disaster e.g., flooding or major incident. Therefore, it is about our ability to respond and meet obligations under Civil Emergencies Act.	Open	
SR 2	Climate Emergency and Climate adaptation (reworded risk)	The Council has declared a climate and ecological emergency and pledged to become carbon neutral by 2030. Failure to achieve carbon neutrality by 2030 would result in the Council not meeting this commitment. Some carbon reduction may require significant investment, particularly if the UK Government does not provide sufficient funding to support project delivery. Increasing cost of investment and capital expenditure is likely to make business cases difficult.	Responding to the Climate and Ecological Emergency	1/6/2023	CEO (GH)	Moderate Probable	12	The Council has approved the Carbon Action Plan 2024-2030. External funding will be secured as far as possible to deliver carbon reduction projects.	moderate possible	9	moderate possible	9	0	Progress against carbon projects is reported through the Councils Project Governance Process	Mar-25	Risk Reduction		Open	
SR 3	Compliance and Regulations	If the council does not comply with legislation, regulations, laws and industry standards, there is a financial risk of penalties and a risk of reputational damage	Working Together for West Oxfordshire	8/8/2024	Director of Governance	Moderate Possible	9	The council understands what laws, regulations and standards it must comply with and has processes in place, such as internal and external audit, manager assurance, and governance arrangements to ensure it remains compliant. Processes, procedures and controls are in place to effectively comply and officers received updates and changes to relevant laws to ensure we remain compliant.	Moderate Possible	9	Moderate Possible	9	0	Ongoing checks are undertaken to ensure compliance through internal and external audit processes	Ongoing	Risk Acceptance & Retention		Open	
SR 4	5 Year land supply	WODC being unable to demonstrate that it has an adequate 5-year supply of deliverable housing land in accordance with national policy. The effect of this is the engagement of the 'tilted balance' set out in paragraph 11 of the NPPF whereby there is a presumption in favour of planning permission being granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The result is increased pressure from speculative development and a greater likelihood of 'planning by appeal'.	Working Together for West Oxfordshire	12/9/2024	Director of Governance	Major Probable	16	Member Briefings / training to raise awareness. Proactive engagement with site promoters to obtain evidence of anticipated delivery. Local plan review to identify new site allocations Preparation of upated Housing and Economic Land Availability Assessment (HELAA).	Moderate Possible	9	Moderate Possible	9	0	New Risk	Ongoing	Risk Reduction		Open	New Risk

Partnership Risks																			
PR 1	Partnership deliverables (Ubico waste provider)	<p>If the 'Waste' contractor does not meet their obligations under key contracts then it could lead to a fall in service standards, reduced customer service, a failure to meet legal requirements or an increase in costs to the Council and reputational impact</p> <p>Waste and Recycling - shortage of qualified HGV drivers, lack of loaders, along with the impact of future Covid variants could result in the Waste Contractor being unable to meet its obligations for waste and recycling collections.</p>	Responding to the Climate and Ecological Emergency	15/6/2023	AD Commercial Services (B.O)	Major	Possible	12	<p>WODC is a shareholder of Ubico, with significant control and influence over the company ensuring ongoing financial viability and affordability for the Council.</p> <p>Contract Management in place to ensure Ubico deliver the service in-line with agreed specification and standards.</p> <p>Performance reports presented to Council.</p>	Major	possible	12	Major	possible	12	0	<p>Ongoing</p> <p>Risk Reduction</p>	Open	
PR 2	Failure of Leisure provider and partnership deliverables (GLL)	<p>If the current leisure provider continues to face national financial difficulties, there is a risk to the council in the delivery of leisure services, resulting in increased costs, and reputational damage. Whilst mitigations can be put in place to increase leisure provision locally, WODC cannot influence the overall GLL financial difficulties / pressures.</p>	Working Together for West Oxfordshire	15/6/2923	AD Communitie s (AB)	Major	Probable	16	<p>Work continues with GLL to make the service sustainable and affordable in the medium term.</p>	Major	possible	12	Major	possible	12	0	<p>Working collaboratively to market services.</p> <p>Funding secured through Sport England Swimming Pool Support Fund.</p>	Open	
PR 3	Partnership Deliverables (Publica)	<p>If Publica do not deliver the Future Publica Savings, this will add additional financial pressure on the Council, also if delivered as a cutting exercise, it could impact on service delivery.</p> <p>If Publica are unable to recruit/retain suitably qualified staff - impact on quality of services delivered, financial impact</p> <p>Services are not able to adequately discharge their (legal) obligations leading to failure - this may not be reported through the quarterly performance reports</p>	Working Together for West Oxfordshire	15/6/2023	CEO (GH)	Major	Possible	12	<p>Financial incentives (market force supplement scheme)</p> <p>Review of pay and benefits package.</p> <p>Introduction of career grade structures in Planning and Project Management</p> <p>Recruitment improvement plan in place</p> <p>Investors in People</p> <p>HR programme in place</p> <p>Shareholder Forum in place to hold Publica to account.</p>	Moderate	Probable	12	Moderate	Probable	12	0	<p>The recommendation to in-source the majority of services from Publica back into the Council has been approved by Executive. All partner Councils have also had the recommendation approved. The Detailed Transition Plan was approved by WoDC and all partner councils and following formal consultation, those in scope for phase 1 have transferred back to WODC employment on 1/11/24. A revised Publica structure has now been approved and communicated to Publica and Council employees. A review of Governance arrangements is currently being undertaken by Local Partnerships.</p> <p>See R5 for more detail.</p>	Open	
M R1	Failure to deliver WODC programme of major projects	<p>If the Council does deliver on it's major projects, this could result in non delivery of Council priorities , cost increases, financial pressures and reputational damage</p>	Working Together for West Oxfordshire		CEO (GH)	Major	Possible	12	<p>All projects require a detailed business case and sign off before proceeding.</p> <p>Project Manager appointed to manage all major projects</p> <p>Project reporting in place, including risk reporting on a monthly basis.</p>	Moderate	Possible	9	Moderate	Possible	9	0	<p>Due to inflation, project costs are increasing for major projects and the cost of borrowing is impacting, in some cases on the viability of businesses cases.</p> <p>This is being monitored on a case by case basis</p>	Open	