

# CORPORATE RISK REGISTER

Gravesham Borough Council’s Corporate Risk Register is the result of a strategic risk management exercise conducted annually to identify, analyse and prioritise those risks that may affect the ability of the council to achieve its corporate objectives. Key risks facing the council are identified through discussion with Cabinet Members, Finance and Audit Committee Members, Members, Directors, Assistant Directors, Heads of Service and other senior managers

The risk management exercise establishes the severity of risks through the utilisation of the risk matrix below. The risk matrix is used to establish the inherent risk score, the residual risk score and the target risk score.

The Inherent Risk – The severity of the risk is determined before any controls have been introduced to reduce or mitigate the risk.

The Residual Risk – The severity of the risk is determined after implementation of controls that reduce or mitigate the risk. The “residual” risk position is effectively the “tolerable” risk position which the Council is willing to operate given current constraints. It balances the funding position with objectives outlined in the council’s Corporate Plan.

The Target Risk – This is the “Optimal” risk position which the Council aims to reach through a combination of both improvements in existing controls and the introduction of new ones. This is informed by the Councils objectives detailed in the Corporate Plan.

## The Risk Matrix

<b>LIKELIHOOD</b>	Very High	5	5	10	15	20	
	High	4	4	8	12	16	
	Medium	3	3	6	9	12	
	Low	2	2	4	6	8	
	Very Low	1	1	2	3	4	
	<b>High Risk</b>		1	2	3	4	
	<b>Medium Risk</b>		Negligible	Significant	Serious	Critical	
	<b>Low Risk</b>						
	<b>IMPACT</b>						

## Guidance used for assessing Likelihood and Impact

### Likelihood:

Rating	Score	
Very High	5	On the evidence and knowledge of officers and members it is almost certain that this issue will occur sometime within the next year. The issue may have already occurred in previous years either at the council or elsewhere.
High	4	On the evidence and knowledge of officers and members it is very likely that this issue or event will occur in the coming year.
Medium	3	On the evidence and knowledge of officers and members, the issue is more likely to occur than not in the coming year.
Low	2	On the evidence and knowledge of officers and members it is unlikely that this event will occur in the coming year. Occurrences of this risk have occurred in the past, but occurrences are very few and far between.
Very Low	1	On the evidence and knowledge that this event would occur in either the coming year or in future years.

### Impact:

Rating	Score	
Critical	4	The financial impact on the authority would threaten the council's financial stability. The delivery of service to the public could be affected either permanently or for a long duration and the council could not achieve its key objectives. There would be a seriously damaging impact on the council's reputation through poor media coverage.
Serious	3	The financial impact on the authority would be significant although would not threaten the stability of the council's financial position. Services would experience disruption with the delivery of services being affected for several days. Whilst the council's objectives would be met there would be significant delays in achieving them.  The council would endure poor media coverage for a period affecting the council's reputation, which would take some time to recover from.
Significant	2	There may be financial impact on the authority and/or the cost of mitigating the risk could exceed the financial implications of the risk there may be disruption to services and possibly delays in achieving the council's objectives. There may be poor media coverage, which could affect the council in the long term.
Negligible	1	There is little or no financial impact of the risk to the authority. There would be no disruption to the delivery of the council's key objectives or frontline services.  There is no risk of this risk impacting on the council's reputation

All risks identified for 2026-2027 and their assessments are summarised in the table below and plotted in the Heat Map:

Risk Ref	Risk Description	Inherent Risk	Residual Risk	Target Risk
1	Financial Sustainability and Resilience	14	12	9
2	Local Government Reorganisation (LGR)	20	15	15
3	Changes in national and regional priorities and legislative changes	20	15	12
4	Organisational capacity/resilience	20	12	9
5	Cyberattack security threats	16	12	8
6	Adoption and delivery of sound Local Plan	12	12	9

The risks that have generated a “High Residual Risk” score can be seen coloured in red, and these have therefore been included in the 2026-2027 Corporate Risk Register.

Risk Heat Map (Residual Risk)

<b>LIKELIHOOD</b>	Very High	5			2,3	
	High	4			1,4,6	
	Medium	3				5
	Low	2				
	Very Low	1				
	High Risk		1	2	3	4
	Medium Risk		Negligible	Significant	Serious	Critical
	Low Risk		<b>IMPACT</b>			

Given that the council works in an ever-changing environment it will be necessary to conduct similar risk management exercises on a periodic basis. Progress against management actions recorded in the register will be reviewed on a six-monthly basis by the Finance and Audit Committee.

As a contribution to good corporate governance, risk management also forms a part of the annual business planning process – each departmental business plan has a specific service risk register to identify the key risks facing that service. This reinforces the corporate risk management approach through each Head of Service giving proper formal consideration to both corporate and operational risks. Appendix 2

The Risk					Financial Sustainability and Resilience										Risk No.		1							
Link to Corporate Objective					# one council a well-run and innovative authority, defined by its skilled and valued workforce, committed to developing its local social impact.																			
Assessment Date					January 2026																			
Cabinet Portfolio					Leader of the Executive (but affects all portfolios)																			
Risk Owner(s)					Director (Corporate Services); Assistant Director (Corporate Services)																			
INHERENT RISK SCORE					RESIDUAL RISK SCORE					TARGET RISK SCORE														
Likelihood		4	Impact		4	Score		Likelihood		4	Impact		3	Score		Likelihood		3	Impact		3	Score		9
Lead Officer (s)										Target Date														
Director (Corporate Services); Assistant Director (Corporate Services)										March 2027														
Trigger					Consequences					Mitigation / Control														
<p>Following the multi-year financial settlement and delivery of £10.1m of Balancing the budget activity, the council is in an improved financial position but in need of building back its financial resilience over the next few years. Potential triggers that could detrimentally impact the process to improve sustainability and resilience in the council's reserves position could include:</p> <ul style="list-style-type: none"> <li>Financial Challenges due to changes in government legislation and/or increased statutory and regulatory requirements, leading to increased pressure on finances.</li> <li>Decisions made by external bodies which have a direct financial impact on the council.</li> <li>Ineffective budget monitoring and budgetary control results in issues emerging that require an immediate rather than planned response.</li> <li>Incorrect assumptions made around key spend and income lines</li> <li>Adjustments to the multi-year settlement places additional financial pressure on the council and its ability to build back resilience into its financial position.</li> <li>The financial impacts on the council from changes to Business Rates from April 2026 are different to those anticipated.</li> <li>Demand for services exceed expectations, resulting in unbudgeted costs required to be met by the council.</li> <li>Delivery slippage in, or cost pressures on, significant capital projects being delivered by the council.</li> </ul>					<ul style="list-style-type: none"> <li>Difficult decisions required around funding of services and quality of services potentially compromised.</li> <li>Inability to plan effectively for future years.</li> <li>The council is unable to deliver as desired against its Corporate Plan commitments. At worst, the council unable to meet its statutory obligations due to lack of funding.</li> <li>Uncertainty of ability and financial capacity to deliver key strategic projects for the benefit of the borough.</li> <li>Working Balances are not restored in the short to medium term to the minimum recommended level.</li> <li>Ability to generate income from investment activity is reduced, further impacting on the resources available to the council to deliver services.</li> <li>Potential to limit investment options available to the council and require the council to disinvest from some of its investment activity</li> </ul>					<ul style="list-style-type: none"> <li>Written Constitution in place which is regularly reviewed and maintained and sets out how the Council operates, how decisions are made and procedures to be followed.</li> <li>Strategy financial policy documents such as the Treasury Management Strategy Statement and Capital Strategy in place which are regularly reviewed and maintained to ensure they remain fit for purpose.</li> <li>Medium-Term Financial Strategy (MTFS) in place which sets the financial governance framework within which the council will manage its financial position.</li> <li>10-year Medium Term Financial Plan (MTFP) and 30-year HRA Business Plan in place with both regularly reviewed to ensure the authority is aware of its financial position.</li> <li>Monthly budget monitoring routines in place with budget holders, and budget monitoring reports presented to F&amp;A Committee and Cabinet alongside treasury updates.</li> <li>Relationships with professional bodies, local government networks, external organisations and engagement with professional groups are maintained to support financial horizon scanning, identification of changes in statutory and regulatory requirements and test assumptions made in the MTFP and HRA Business Plan.</li> <li>Support secured from external technical experts, including treasury consultants, on areas of activity where the council does not hold this expertise in-house.</li> <li>Regular monitoring undertaken of key areas of financial risk and volatility.</li> <li>Reserves and Working Balances in place which are reviewed at least annually to confirm that they remain fit for purpose and reflective of risks and expected financial liabilities faced by the council.</li> </ul>														

Key corporate documents and processes in place	<ul style="list-style-type: none"> <li>• Corporate Plan 2023-2027</li> <li>• Medium Term Financial Strategy MTFS &amp; Medium-Term Financial Plan MTFP</li> <li>• Treasury Management Strategy (TMS)</li> <li>• Capital Strategy</li> <li>• Treasury monitoring arrangements with advisors and Fund Managers</li> <li>• Review of Reserves and Working Balances</li> <li>• Monitoring of key areas of financial risk and volatility</li> <li>• Budget Monitoring and reporting processes</li> <li>• Business Case Template</li> <li>• Circulation of monthly policy bulletins and briefings to Wider Management Team and key officers</li> <li>• Partnership Working &amp; Information Sharing with other local authorities through relevant networks and forums</li> <li>• Business Continuity Planning</li> <li>• Workforce Strategy</li> </ul>
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The Risk	Local Government Reorganisation (LGR)										Risk No.	2					
Link to Corporate Objective	<p><b>#oneborough:</b> a safe, clean, and attractive living environment, enhanced by a sustainable and increasingly energised local economy.</p> <p><b>#onecommunity:</b> an active, engaged, and culturally enriched population, built on the foundations of an affordable and quality local housing offer.</p> <p><b>#onecouncil:</b> a well-run and innovative authority, defined by its skilled and valued workforce, committed to developing its local social impact.</p>																
Assessment Date	January 2026																
Cabinet Portfolio	All portfolios																
Risk Owner(s)	Chief Executive and Management Team																
INHERENT RISK SCORE				RESIDUAL RISK SCORE					TARGET RISK SCORE								
Likelihood	5	Impact	4	Score	20	Likelihood	5	Impact	3	Score	15	Likelihood	5	Impact	3	Score	15

Lead Officer (s)	Target Date
Chief Executive/ Management Team/Wider Management Team	Through to Vesting Day

Trigger	Consequences	Mitigation / Control
<p>Kent as an area is currently subject to a statutory government-led public consultation on options for LGR. A government decision on the preferred option is expected in Summer 2026, with associated draft legislation expected to be laid before Parliament by the end of 2026, shadow unitary elections in May 2027 and new unitary Vesting Day taking place on 1 April 2028. The council will need to apply resources to the activity to support planning and delivery of LGR.</p> <p>Potential triggers that could detrimentally impact the LGR process and the council could include:</p> <ul style="list-style-type: none"> <li>• Compressed timelines and unclear scope/legislation until late in the process</li> <li>• Insufficient capacity/skills within the organisation, particularly in programme management, legal, HR, ICT architecture, data migration, and finance</li> <li>• Complex TUPE and pension disaggregation and aggregation issues; industrial relations challenges</li> <li>• Deterioration of relationships with other individuals and organisations (e.g., county/district partners, PCC/ICS, Unions, contractors and suppliers)</li> <li>• Incomplete or poor-quality data for systems convergence and financial consolidation</li> <li>• Delayed decisions on governance model, constitution, and scheme of delegation</li> <li>• Procurement and contract novation risks; contingent liabilities surfacing late</li> </ul>	<ul style="list-style-type: none"> <li>• Council may not have the necessary resources or capacity to deliver on key projects and meet the requirements of LGR pre-vesting day.</li> <li>• Deterioration in staff engagement and retention; increased sickness/agency costs</li> <li>• Potential service disruption and statutory breaches.</li> <li>• Reputational damage</li> <li>• Delivery of key projects put at risk.</li> <li>• Delayed or poor-quality decision-making.</li> </ul>	<ul style="list-style-type: none"> <li>• Existing formal and informal structures and relationships in place at Member and Officers level to aid and assist cross-county working.</li> <li>• Kent work programme being developed to co-ordinate cross county activity to support the implementation of LGR.</li> <li>• Internal work programme in place to ensure consideration of activity required in key areas to vesting day.</li> <li>• Work commenced to consider the effective use of external professional experts, redeployment solutions and other tools to support activity required.</li> <li>• Decision making in line with the constitution and scheme of delegation</li> <li>• Reserve set in place to enable the council to meet the costs that will be incurred or will be likely to fall on it in preparing for LGR in Kent.</li> <li>• Rigorous financial oversight to ensure that LGR costs are financially proportionate and not cross subsidising.</li> <li>• Contracts Register established to enable clear view of the council's contractual liabilities to be obtained, and considerations commenced around contract alignment and novation requirements and supplier engagement.</li> </ul>

Key corporate documents and processes in place	<ul style="list-style-type: none"> <li>• Constitution</li> <li>• Corporate Plan 2023-2027</li> <li>• Medium Term Financial Strategy MTFS &amp; Medium-Term Financial Plan MTFP</li> <li>• Continued proactive engagement in established formal and informal forums and professional groups such as Kent Leaders, Kent Chief Executives etc.</li> <li>• Partnership Working &amp; Information Sharing with other local authorities through relevant networks and forums</li> <li>• Business Continuity Planning</li> <li>• Workforce Strategy</li> </ul>
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The Risk	Changes in national and regional priorities and legislative change										Risk No.	3					
Link to Corporate Objective	<p><b>#oneborough:</b> a safe, clean, and attractive living environment, enhanced by a sustainable and increasingly energised local economy. <b>#onecommunity:</b> an active, engaged, and culturally enriched population, built on the foundations of an affordable and quality local housing offer.</p> <p><b>#onecouncil:</b> a well-run and innovative authority, defined by its skilled and valued workforce, committed to developing its local social impact.</p>																
Assessment Date	January 2026																
Cabinet Portfolio	All portfolios																
Risk Owner(s)	Chief Executive and Management Team																
INHERENT RISK SCORE				RESIDUAL RISK SCORE					TARGET RISK SCORE								
Likelihood	5	Impact	4	Score	20	Likelihood	5	Impact	3	Score	15	Likelihood	4	Impact	3	Score	12

Lead Officer (s)	Target Date
Chief Executive/ Management Team/Wider Management Team	March 2027

Trigger	Consequences	Mitigation / Control
<p>The council operates within a political and legal landscape. Potential triggers that could impact on the use and allocation of the council's finite resources could include:</p> <ul style="list-style-type: none"> <li>• Changes in national priorities including National Significant Infrastructure Projects (NSIP).</li> <li>• Current proposals affecting the Borough:- <ul style="list-style-type: none"> <li>➢ Lower Thames Crossing (Gravesham)</li> <li>➢ Thurrock Flexible Generation Plant (Tilbury)</li> </ul> </li> <li>• Potential changes in legislation/statutory duties imposed by Central Government in areas such as: - <ul style="list-style-type: none"> <li>➢ Local Government Reorganisation &amp; Devolution</li> <li>➢ Local Government Finance Settlement – Funding Reform</li> <li>➢ Housing &amp; Renting Reform</li> <li>➢ Democratic Renewal and Voting Reform</li> <li>➢ Procurement Reform</li> <li>➢ Planning – updating National Planning Policy Framework</li> </ul> </li> <li>• Decisions made by local authorities, local organisations or other local external bodies which have a direct material negative impact on the Council.</li> </ul>	<ul style="list-style-type: none"> <li>• Council may not have the necessary resources to deliver on key projects.</li> <li>• Projects may adversely affect residents.</li> <li>• Introduction of new statutory duties could: - <ul style="list-style-type: none"> <li>➢ Change the strategic direction of the Council</li> <li>➢ Result in new statutory duties not being enacted leading to legal challenge</li> <li>➢ Entail additional workloads for officers</li> <li>➢ Move to an agile way, directing resources as required</li> <li>➢ Increase scrutiny by members and the public</li> <li>➢ Change the way existing services are delivered</li> <li>➢ Increased financial pressures</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Monthly policy bulletins are circulated by the Strategic Policy Manager to Wider Management Team (WMT) and key officers.</li> <li>• Working with formal and informal stakeholders and partner organisations to keep informed of developments such as: - <ul style="list-style-type: none"> <li>➢ Local Government Association</li> <li>➢ District Councils Network</li> <li>➢ Kent Finance Officers Group</li> <li>➢ Kent Resilience Forum</li> </ul> </li> <li>• Information sharing and gathering across all Council services</li> <li>• Circulation of monthly briefings to key officers on proposed/new legislation.</li> <li>• Effective business continuity planning.</li> <li>• Regular updates to members on development and potential changes in legislation.</li> <li>• Preparation of Workforce Strategy.</li> <li>• Co-ordination and sharing of information with other local authorities through various networks and forums.</li> </ul>
<p>Key corporate documents and processes in place</p>	<ul style="list-style-type: none"> <li>• Corporate Plan 2023-2027</li> <li>• Medium Term Financial Strategy MTFS &amp; Medium-Term Financial Plan MTFP</li> <li>• Circulation of monthly policy bulletins and briefings to Wider Management Team and key officers</li> <li>• Partnership Working &amp; Information Sharing with other local authorities through relevant networks and forums</li> <li>• Business Continuity Planning</li> <li>• Workforce Strategy</li> </ul>	

The Risk					Organisational capacity/resilience					Risk No.		4					
Link to Corporate Objective					#oneborough: a safe, clean, and attractive living environment, enhanced by a sustainable and increasingly energised local economy												
Assessment Date					January 2026												
Cabinet Portfolio					Leader of the Executive (but affects all portfolios)												
Risk Owner(s)					Chief Executive and Management Team												
INHERENT RISK SCORE					RESIDUAL RISK SCORE					TARGET RISK SCORE							
Likelihood	5	Impact	4	Score	20	Likelihood	4	Impact	3	Score	12	Likelihood	3	Impact	3	Score	9

Lead Officer (s)										Target Date							
HR Business Partner										March 2027							
Trigger					Consequences					Mitigation / Control							
<p>Like other local authorities across England, this council is under intense and increasing strain, driven by structural reforms, financial pressures, workforce shortages, and escalating service demand.</p> <p>Potential triggers that could impact on the use and allocation of the council's finite resources could include:</p> <ul style="list-style-type: none"> <li>External opportunities of agile and home working making it more difficult to recruit and retain staff, especially those in specialist roles.</li> <li>Overstretched resources resulting with reduced staff motivation, low morale and increased sickness and stress levels.</li> <li>Staff uncertainty around devolution and/or local government reorganisation</li> </ul>					<ul style="list-style-type: none"> <li>Increase in turnover resulting in a reduction in staff numbers and loss of corporate knowledge.</li> <li>Specialist roles remain vacant for prolonged periods of time, placing additional pressures on staff in service areas which may already have stretched resources.</li> <li>Potential need to make use of agency and interim staff, increasing cost to the council.</li> <li>Impact of service delivery standards, potentially leading to increased levels of service complaints and intervention.</li> <li>Increase in organisational stress negatively impacting productivity and mental health and wellbeing.</li> <li>Additional welfare and assistance needed to support the workforce.</li> </ul>					<ul style="list-style-type: none"> <li>Improved linkages made between workforce planning and financial and service planning.</li> <li>Hybrid Working Policy provides office-based staff with the opportunity to work from home, depending on the needs of the service.</li> <li>Initiatives introduced to ensure the Council remains competitive in retaining existing staff and attracting potential employees e.g. investment in increased training and continuous learning, improved recruitment advertising strategy, clear career progression routes, introduction of Management Development Programme, enhanced staffing benefits including Vivup: Employee Benefits scheme and electric vehicle salary sacrifice.</li> <li>Initiatives introduced to manage stress and sickness levels e.g. monitoring stress and sickness absence, conducting periodic wellbeing surveys, promotion of Mental Health Champion role, continuation of Investors in People.</li> <li>Initiatives introduced to improve and maintain staff motivation e.g. delivery of management to line managers on leadership behaviours for managing and motivating hybrid teams, the Hybrid Working Policy.</li> <li>Effective use of apprenticeships and career-graded roles to create internal promotion routes in hard to recruit areas and develop in-house talent.</li> </ul>							

Key corporate documents and processes in place

- Corporate Business Plan 2023-2027
- Workforce Development Plan
- Hybrid Working Policy
- Initiatives to retain existing staff and attract new talent
- Stress and Sickness absence monitoring
- Referrals to Occupational Health and Employee Assistance Programme when necessary
- Introduction of Management Development Programme
- Maintaining Investors in People (IIP) reviews

The Risk					Cyberattack security threats resulting in loss of system access, data breach or corruption of data					Risk No.		5					
Link to Corporate Objective					# <b>onecouncil</b> : a well-run and innovative authority, defined by its skilled and valued workforce, committed to developing its local social impact.												
Assessment Date					January 2026												
Cabinet Portfolio					Leader of the Executive												
Risk Owner(s)					Director (Corporate Services)												
INHERENT RISK SCORE					RESIDUAL RISK SCORE					TARGET RISK SCORE							
Likelihood	4	Impact	4	Score	16	Likelihood	3	Impact	4	Score	12	Likelihood	2	Impact	4	Score	8

Lead Officer (s)					Target Date							
Head of Digital & IT					March 2027							
	Trigger		Consequences					Mitigation/Control				
4.1	Member of staff falls victim to phishing attack		The login credentials used by a member of staff is stolen enabling an unauthorised user to access and modify data and systems used by that person. In the case of a user with access to privileged systems this may also enable administrative access and the ability to move laterally between systems. The ultimate consequence could be a cyber-attack resulting in a loss of access to Council systems and data.					<ul style="list-style-type: none"> <li>Trained and qualified staff</li> <li>IT Security Technologies – devices to filter traffic and protect the network, virus control software and domain access rules e.g. Conditional Access and Encryption</li> <li>Proactive threat hunting, monitoring and alerting</li> <li>Regular backup of data to systems that have ransomware protection and immutable storage</li> <li>Operational policies, processes, procedures and guidance notes</li> <li>Annual mandatory cyber security and Information Governance staff training</li> <li>Investigation into incidents and breaches</li> </ul>				
4.2	Member of staff falls victim to “drive by download”		A member of staff visits a website which has been poisoned with malware which automatically runs when the web page is viewed. The malware can access resources on the computer with the same level of access as the logged in user, or with elevated privileges if combined with additional vulnerabilities (such as unpatched software). The ultimate consequence could be a cyber-attack resulting in a loss of access to Council systems and data.									
4.3	Misconfiguration of IT Infrastructure results in a breach		An item of IT infrastructure is accidentally configured in such a way that it allows exploitation by an external actor to carry out a cyber-attack resulting in a loss of access to Council systems and data									

4.4	Brute force attack against IT infrastructure results in breach	An attacker constantly attempts to gain access to Council systems via external infrastructure (web sites, email systems, VPN) in a systematic way with the hope of finding a vulnerability which will provide access to Council systems and data. Once access has been gained, the ultimate consequence could be a cyberattack resulting in a loss of access to Council systems and data.	<ul style="list-style-type: none"> <li>• Proactive patch management</li> <li>• System Change Management process via Change Advisory Board</li> <li>• Web filtering software to control access to high-risk websites</li> <li>• Regular review of IT defences (such as firewall rules and network configurations) to ensure they are operating effectively</li> <li>• IT Services Senior Management Team (SMT) undertake regular infrastructure reviews</li> <li>• An information Governance Group has been formed.</li> </ul>
4.5	Unpatched software vulnerability results in breach	All software has the potential to have bugs and programming errors. Unpatched software means there are vulnerabilities in a program or code that the Council is aware of and will not or cannot fix. Bugs in software can be exploited to carry out tasks for which the software was not originally designed to perform, such as carrying out a cyber-attack.	
4.6	Denial of service attack prevents IT systems from being used	The Council's Internet connection is flooded with a high volume of meaningless data which prevent legitimate data from getting through. Access to Council services for staff and members of the public is prevented and the systems appear to be down.	
4.7	Ransomware attack steals and then deletes Council data	A malicious actor who has gained a foothold within the Council IT infrastructure is able steal large volumes of data before destroying access to that data for the Council. Staff cannot access their systems or data and provide their services.	
4.8	Member of staff falls victim to a phishing attack because of using a Generative Artificial Intelligence (AI) tool.	<p>Use of Artificial Intelligence (AI) tools can be used to automate, accelerate and magnify the impact of highly targeted cyber-attacks, increasing the severity of the threat from malicious actors.</p> <p>The login credentials used by a member of staff is stolen enabling an unauthorised user to access and modify data and systems used by that person. In the case of a user with access to privileged systems this may also enable administrative access and the ability to move laterally between systems. The ultimate consequence could be a cyber-attack resulting in a loss of access to Council systems and data.</p>	

Key corporate documents and processes in place

Governance

- Management Team
- Council Committees
- IT Services Senior Management Team (SMT) undertake regular infrastructure reviews
- Information Governance Group
- IT Services System Risk Assessments
- Data Privacy Impact Assessments conducted across the authority
- Vendor Management
- Policy documentation including, Information Technology (IT) Acceptable Use Policy, IT Access Control Policy etc.
- Disaster Recovery and Business Continuity Plans

Assurance

- External IT Health Checks for PSN Accreditation by Surecloud. Surecloud are National Cyber Security Centre and Check approved.
- External Penetration testing on internet facing services by Surecloud. Surecloud are National Cyber Security Centre and Check approved.
- Public Services Network (PSN) assurance review annually
- Regular Internal Audit reviews across the IT service.

The Risk					Adoption and delivery of sound Local Plan					Risk No.		6					
Link to Corporate Objective					#oneborough: a safe, clean, and attractive living environment, enhanced by a sustainable and increasingly energised local economy												
Assessment Date					January 2026												
Cabinet Portfolio					Planning and Business Development												
Risk Owner(s)					Director (Environment)												
INHERENT RISK SCORE					RESIDUAL RISK SCORE					TARGET RISK SCORE							
Likelihood	4	Impact	4	Score	16	Likelihood	4	Impact	3	Score	12	Likelihood	3	Impact	3	Score	9

Lead Officer (s)										Target Date								
Head of Planning										December 2026								
Trigger					Consequences							Mitigation / Control						
<ul style="list-style-type: none"> <li>Local Plan is not up-to-date and not underpinned by a robust evidence base. Currently completed Regulation 18 Stage</li> <li>The National Planning Policy Framework was updated in December 2024. This introduced a range of updates, including the concept of 'grey belt,' which will need to be considered in the drafting of the Local Plan. The 'grey belt' concept has led to planning applications made to the council on sites within the rural parts of the borough.</li> <li>Further amendments are proposed to the National Planning Policy Framework (NPPF).</li> </ul>					<ul style="list-style-type: none"> <li>The Government has a clear objective of delivering 1.5 million homes during this Parliament and sees emerging Local Plans as a key component for maximising delivery of housing, infrastructure and economic growth.</li> <li>There is a risk of receiving speculative development in an unplanned location in the green belt or poor-quality development proposals that may undermine the character of the borough or blight the long-term regeneration opportunities of new affordable homes and jobs for local communities.</li> <li>Where councils cannot demonstrate a five-year supply, national planning policy, rather than policies in a Local Plan have greater influence in decision making. National policy states there should be a "presumption in favour of sustainable development" for housing. If a site can be considered to deliver 'sustainable development' then planning permission could be granted, even if there is no support from the council for housing in that location or the site sits outside the Local Plan.</li> <li>Councils have less control over where new homes are built and may have to recommend approval of applications for sites not allocated.</li> <li>There's also a risk of more rejected proposals being subject to appeal</li> </ul> <p>and more refused applications being approved on appeal.</p>							<ul style="list-style-type: none"> <li>➤ Monitoring and management of the local plan delivery plan by Members and Officers through:</li> <li>➤ Continuing development and review of the Local Plan Evidence base.</li> <li>➤ Alignment of housing land supply with regeneration strategy.</li> <li>➤ Continue assigning resources to enable delivery.</li> <li>➤ Continue assigning programme and engagement resources to support the process.</li> <li>➤ Continue ongoing dialogue with government and stakeholders to unlock brownfield first delivery on key sites like Albion Waterside and Northfleet Harbourside.</li> <li>➤ Providing progress updates to senior management and Members with strong oversight on the vision and direction.</li> <li>➤ Working closely with all relevant external organisations to ensure the required information to deliver the local plan is obtained as efficiently as possible. Especially with regard to risks that cannot be completely mitigated because they are under the control of external organisations, such as transport modelling data that is controlled by KCC or National Highways.</li> <li>➤ Ensure clear communications on the process and follow</li> </ul>						

		<p>statutory process including consultations</p> <ul style="list-style-type: none"> <li>➤ The Cabinet approved the publication draft of the emerging local plan (regulation 19) on 2 February 2026 subject to minor amendments.</li> </ul>
<p>Key corporate documents and processes in place</p>	<ul style="list-style-type: none"> <li>• Local Plan Regulation 19 document, supporting evidence base and documentation</li> <li>• Strategic Housing Land Availability Assessment</li> <li>• Local Development Scheme</li> </ul>	