

## Corporate Risk Register

2025-26

<b>Organisation</b>	Gravesham Borough Council
<b>Title</b>	Corporate Risk Register (Appendix 2) to the <a href="#">Corporate Risk Management Strategy</a>
<b>Responsible Department</b>	Corporate Services
<b>Date</b>	April 2025
<b>Review</b>	Annually

### Introduction

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 councils 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 a number of 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 of time 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 2025-2026 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	On-going financial viability of the council	20	16	12
2	Changes in national and regional priorities and legislative change	20	15	12
3	Organisational capacity/resilience	20	12	9
4	Cyber security threats resulting in loss of system access, data breach or corruption of data	16	12	8
5	Investment risk	15	10	9
6	Adoption and delivery of sound Local Plan	16	12	9
7	STG Building Control Partnership - Licencing of Surveyors	16	12	12

The risks that have generated a “High Residual Risk” score can be seen coloured in red and these have therefore been included in the 2025-2026 Corporate Risk Register.

### Risk Heat Map (Residual Risk)

Very High	5		5	2	
High	4			3,6	1
Medium	3				4,7
Low	2				
Very Low	1				
High Risk		1	2	3	4
Medium Risk		Negligible	Significant	Serious	Critical
Low Risk		IMPACT			

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.

<b>The Risk</b>	<b>Ongoing financial viability of the Council</b>											<b>Risk No.</b>	<b>1</b>				
<b>Link to Corporate Objective</b>	# one council a well-run and innovative authority, defined by its skilled and valued workforce, committed to developing its local social impact.																
<b>Assessment Date</b>	January 2025																
<b>Cabinet Portfolio</b>	Leader of the Executive (but affects all portfolios)																
<b>Risk Owner(s)</b>	Director (Corporate Services); Assistant Director (Corporate Services)																
<b>INHERENT RISK SCORE</b>					<b>RESIDUAL RISK SCORE</b>					<b>TARGET RISK SCORE</b>							
<b>Likelihood</b>	5	<b>Impact</b>	4	<b>Score</b>	20	<b>Likelihood</b>	4	<b>Impact</b>	4	<b>Score</b>	16	<b>Likelihood</b>	4	<b>Impact</b>	3	<b>Score</b>	12

<b>Lead Officer (s)</b>	<b>Target Date</b>
Director (Corporate Services); Assistant Director (Corporate Services)	March 2026

<b>Trigger</b>	<b>Consequences</b>	<b>Mitigation / Control</b>
<ul style="list-style-type: none"> <li>Financial Challenges due to changes in government legislation, leading to increased financial pressure on the budget.</li> <li>Single year finance settlement for 2025/26 (sixth year in succession). Should this continue in future years it will continue to provide uncertainty as to how local government will be funded in future years.</li> <li>Decisions made by external bodies which have a direct financial impact on the council.</li> <li>Central Government Finance reforms have been put on hold (fair funding review, business rates retention and future of new homes bonus).</li> <li>Demand for some services i.e. Homelessness, resulting in increased costs which are not met by government funding. Gross spend on temporary accommodation has increased by 450% in past 4 years.</li> <li>Delivery slippage of large projects in the Capital Programme</li> </ul>	<ul style="list-style-type: none"> <li>Difficult decisions around funding of services and quality of services compromised.</li> <li>Inability to plan effectively for future years.</li> <li>Council not being able to meet its statutory obligations due to lack of funding.</li> <li>Uncertainty of funding for the authority and for future projects</li> <li>Changes in legislation have a negative financial impact on the Council.</li> <li>Impact on minimum reserve limits.</li> </ul>	<ul style="list-style-type: none"> <li>Government has indicated it is looking towards having a multi-year settlement from 2026/27 thereby providing more certainty and assisting financial planning/action.</li> <li>Quarterly budget monitoring is established for presentation to F&amp;A Committee and Cabinet. The report provides a narrative on risks to the council's budget position alongside updates on delivery of Balancing the Budget activity.</li> <li>Monthly budget monitoring reports are sent to budget holders who are responsible for identifying key budget variances.</li> <li>Medium Term Financial Plan (MTFP) is continually monitored ensuring the authority is aware of its financial position.</li> <li>MTFP is presented to Management Team showing progress against agreed initiatives.</li> <li>The 10 year MTFP is regularly reviewed to ascertain budget gaps in future years and changes are routinely modelled into the MTFP.</li> <li>The Medium Term Financial Strategy (MTFS) is in place and this includes "Balancing the Budget" activities which are monitored and presented to Management Team on a monthly basis.</li> <li>Relationships with external organisations and engagement with professional groups are maintained. Any changes in legislation are monitored and Finance Team are advised through press releases local government networks and CIPFA.</li> </ul>

<b>Key corporate documents and processes in place</b>	<ul style="list-style-type: none"> <li>Effective Budget Monitoring</li> <li>Medium Term Financial Plan (MTFP) and Medium Term Financial Strategy (MTFS) are place and monitored</li> <li>Changes in legislation are monitored and the effects of any changes in legislation are applied to the MTFP</li> <li>Government Consultations are responded to when necessary</li> <li>A robust business case template is in place</li> </ul>
---	---

<b>The Risk</b>					<b>Changes in national and regional priorities and legislative change</b>					<b>Risk No.</b>		<b>2</b>					
<b>Link to Corporate Objective</b>					<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>												
<b>Assessment Date</b>					January 2025												
<b>Cabinet Portfolio</b>					All portfolios												
<b>Risk Owner(s)</b>					Chief Executive and Management Team												
<b>INHERENT RISK SCORE</b>					<b>RESIDUAL RISK SCORE</b>					<b>TARGET RISK SCORE</b>							
<b>Likelihood</b>	5	<b>Impact</b>	4	<b>Score</b>	20	<b>Likelihood</b>	5	<b>Impact</b>	3	<b>Score</b>	15	<b>Likelihood</b>	4	<b>Impact</b>	3	<b>Score</b>	12

<b>Lead Officer (s)</b>					<b>Target Date</b>				
Chief Executive/ Management Team/Wider Management Team					March 2026				

<b>Trigger</b>	<b>Consequences</b>	<b>Mitigation / Control</b>
<ul style="list-style-type: none"> <li>Changes in national priorities including National Significant Infrastructure Projects (NSIP).</li> <li>Current proposals that affect the Borough are: - <ul style="list-style-type: none"> <li>➢ Lower Thames Crossing (Gravesham)</li> <li>➢ Thurrock Flexible Generation Plant (Tilbury)</li> </ul> </li> <li>Following a new government in 2024 anticipated change (s) in legislation / statutory duties imposed by Central Government such as: - <ul style="list-style-type: none"> <li>➢ Commitment to build 1.5 million new homes over the next parliament</li> <li>➢ Planning – updating National planning policy framework</li> <li>➢ Ambitious programme of Local Government Reorganisation /Devolution</li> <li>➢ Local Government Financial Reform</li> <li>➢ Reducing and ultimately ending homelessness</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 local 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>➢ Increase financial pressures (discussed as part of risk 1)</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 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>
<b>Key corporate documents and processes in place</b>	<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>	

<b>The Risk</b>					<b>Organisational capacity/resilience</b>					<b>Risk No.</b>		<b>3</b>					
<b>Link to Corporate Objective</b>					#oneborough: a safe, clean, and attractive living environment, enhanced by a sustainable and increasingly energised local economy												
<b>Assessment Date</b>					January 2025												
<b>Cabinet Portfolio</b>					Leader of the Executive (but affects all portfolios)												
<b>Risk Owner(s)</b>					Chief Executive and Management Team												
<b>INHERENT RISK SCORE</b>					<b>RESIDUAL RISK SCORE</b>					<b>TARGET RISK SCORE</b>							
<b>Likelihood</b>	5	<b>Impact</b>	4	<b>Score</b>	20	<b>Likelihood</b>	4	<b>Impact</b>	3	<b>Score</b>	12	<b>Likelihood</b>	3	<b>Impact</b>	3	<b>Score</b>	9

<b>Lead Officer (s)</b>					<b>Target Date</b>				
HR Business Partner					June/July 2025				

<b>Trigger</b>	<b>Consequences</b>	<b>Mitigation / Control</b>
<ul style="list-style-type: none"> <li>External opportunities of agile and home working in light of the COVID pandemic is making it difficult to recruit 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 (especially office based) experiencing difficulties in adapting to remote working.</li> <li>Staff uncertainty around devolution and/or local government reorganisation</li> </ul>	<ul style="list-style-type: none"> <li>Increase in turnover resulting with a reduction in staff,</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>Increased agency costs.</li> <li>Services areas with reduced staff will suffer a greater impact.</li> <li>Council will be required to provide additional help and support to overcome problems.</li> <li>Increase in organisational stress negatively impacting productivity and mental health and wellbeing.</li> </ul>	<ul style="list-style-type: none"> <li>A Hybrid Working Policy exists which gives office-based staff 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. increased training, improving advert templates, availability of career progression, introduction of Management Development Programme.</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> </ul>

<b>Key corporate documents and processes in place</b>	<ul style="list-style-type: none"> <li>Corporate Business Plan 2023-2027</li> <li>Workforce Development Plan</li> <li>Hybrid Working Policy</li> <li>Initiatives to retain existing staff and attract new talent</li> <li>Stress and Sickness absence monitoring</li> <li>Referrals to Occupational Health and Employee Assistance Programme when necessary</li> <li>Introduction of Management Development Programme</li> <li>Maintaining Investors in People (IIP) reviews</li> </ul>
---	---

<b>The Risk</b>					<b>Cyberattack security threats resulting in loss of system access, data breach or corruption of data</b>					<b>Risk No.</b>		<b>4</b>					
<b>Link to Corporate Objective</b>					#onecouncil: a well-run and innovative authority, defined by its skilled and valued workforce, committed to developing its local social impact.												
<b>Assessment Date</b>					January 2025												
<b>Cabinet Portfolio</b>					Leader of the Executive												
<b>Risk Owner(s)</b>					Director (Corporate Services)												
<b>INHERENT RISK SCORE</b>					<b>RESIDUAL RISK SCORE</b>					<b>TARGET RISK SCORE</b>							
<b>Likelihood</b>	4	<b>Impact</b>	4	<b>Score</b>	16	<b>Likelihood</b>	3	<b>Impact</b>	4	<b>Score</b>	12	<b>Likelihood</b>	2	<b>Impact</b>	4	<b>Score</b>	8

<b>Lead Officer (s)</b>					<b>Target Date</b>				
Head of Digital & IT					November 2025				

	<b>Trigger</b>	<b>Consequences</b>	<b>Mitigation/Control</b>
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.	<b>Operational</b> <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> <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> </ul> <b>Governance</b> <ul style="list-style-type: none"> <li>Management Team</li> <li>Council Committees</li> <li>IT Services Senior Management Team (SMT) undertake regular infrastructure reviews</li> <li>Information Governance Group</li> <li>IT Services System Risk Assessments</li> <li>Data Privacy Impact Assessments conducted across the authority</li> <li>Vendor Management</li> <li>Policy documentation including, Information Technology (IT) Acceptable Use Policy, IT Access Control Policy etc.</li> <li>Disaster Recovery and Business Continuity Plans</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.	



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.	<b>Assurance</b> <ul style="list-style-type: none"> <li>• External IT Health Checks for PSN Accreditation by Surecloud. Surecloud are National Cyber Security Centre and Check approved.</li> <li>• External Penetration testing on internet facing services by Surecloud. Surecloud are National Cyber Security Centre and Check approved.</li> <li>• Public Services Network (PSN) assurance review annually</li> <li>• Internal Audit reviews</li> </ul>
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 are not able to 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>	
<b>Key corporate documents and processes in place</b>		<p><b>Governance</b></p> <ul style="list-style-type: none"> <li>• Management Team</li> <li>• Council Committees</li> <li>• IT Services Senior Management Team (SMT) undertake regular infrastructure reviews</li> <li>• Information Governance Group</li> <li>• IT Services System Risk Assessments</li> <li>• Data Privacy Impact Assessments conducted across the authority</li> <li>• Vendor Management</li> <li>• Policy documentation including, Information Technology (IT) Acceptable Use Policy, IT Access Control Policy etc.</li> <li>• Disaster Recovery and Business Continuity Plans</li> </ul> <p><b>Assurance</b></p> <ul style="list-style-type: none"> <li>• External IT Health Checks for PSN Accreditation by Surecloud. Surecloud are National Cyber Security Centre and Check approved.</li> <li>• External Penetration testing on internet facing services by Surecloud. Surecloud are National Cyber Security Centre and Check approved.</li> <li>• Public Services Network (PSN) assurance review annually</li> <li>• Regular Internal Audit reviews across the IT service.</li> </ul>	

<b>The Risk</b>					<b>Investment Risk</b>					<b>Risk No.</b>		<b>5</b>					
<b>Link to Corporate Objective</b>					#onecouncil: a well-run and innovative authority, defined by its skilled and valued workforce, committed to developing its local social impact.												
<b>Assessment Date</b>					January 2025												
<b>Cabinet Portfolio</b>					Leader of the Executive												
<b>Risk Owner(s)</b>					Director (Corporate Services)												
<b>INHERENT RISK SCORE</b>					<b>RESIDUAL RISK SCORE</b>					<b>TARGET RISK SCORE</b>							
<b>Likelihood</b>	5	<b>Impact</b>	3	<b>Score</b>	15	<b>Likelihood</b>	5	<b>Impact</b>	2	<b>Score</b>	10	<b>Likelihood</b>	3	<b>Impact</b>	3	<b>Score</b>	9

<b>Lead Officer (s)</b>					<b>Target Date</b>				
Director (Corporate Services), Assistant Director (Corporate Services)					March 2026				

<b>Trigger</b>	<b>Consequences</b>	<b>Mitigation / Control</b>
<ul style="list-style-type: none"> <li>Investments do not perform as expected.</li> <li>Commercial property does not maintain the expected rental yield.</li> <li>Further government intervention on investment activity through changes to the Prudential Code and access to Public Works Loan Board (PWLB).</li> </ul>	<ul style="list-style-type: none"> <li>Investment income is reduced, negatively impacting on budget and the reputation of the Council which could impact on the delivery of services due to the loss of income.</li> <li>Reduction in income for the Council which could adversely affect the delivery of services due to lack of financial resources.</li> <li>Council could be limited in its investment options going forward Requirement to disinvest in some areas that are performing well to ensure compliance with the relevant codes and legislation.</li> </ul>	<ul style="list-style-type: none"> <li>External professional advice is sought on new investment activity such as from the Councils treasury management advisors and subjected to due diligence checks</li> <li>Regular meetings with fund managers to ascertain how investments are performing.</li> <li>Maintaining and reporting on the Council's Treasury Management Strategy and Capital Strategy, which set out the criteria for investments</li> <li>Regular updates to members and management team on investment performance.</li> <li>Monitoring and review of treasury activity.</li> <li>Investment Income Equalisation Reserve in place.</li> <li>Close working between finance and property services to enable early identification of risks or opportunities to the Council's investment portfolio.</li> <li>Maintaining the commercial income protection reserve. Currently this reserve is set at 25% of annual commercial income.</li> <li>Maintaining and reviewing the Property Acquisition Strategy and ensuring all commercial investments align with this strategy.</li> <li>Development of a Commercial Income Dashboard.</li> <li>Review of commercial property portfolio to ensure it is compliant with the Prudential Code and PWLB criteria.</li> <li>Research other investment opportunities / income streams.</li> <li>Assessment of investment decisions against code requirements before activity is undertaken.</li> </ul>

<b>Key corporate documents and processes in place</b>	<ul style="list-style-type: none"><li>• Treasury Management Strategy (TMS)</li><li>• Capital Strategy</li><li>• Property Acquisition Strategy</li><li>• Receipt of professional advice from the Councils treasury management investors</li><li>• Regular meetings with fund managers</li><li>• Regular presentation of performance updates to Members and management team</li><li>• Regular review and monitoring of treasury activity</li><li>• Close working relationship between Finance and Property Services departments</li><li>• Maintenance of the commercial income protection reserve.</li><li>• Maintenance and review of the Property Acquisition Strategy</li><li>• Developed Commercial Income Dashboard</li><li>• Regular review of commercial property portfolio</li><li>• Research opportunities for investment and income streams</li><li>• A robust business case template in place</li></ul>
---	--

<b>The Risk</b>					<b>Adoption and delivery of sound Local Plan</b>					<b>Risk No.</b>		<b>6</b>					
<b>Link to Corporate Objective</b>					#oneborough: a safe, clean, and attractive living environment, enhanced by a sustainable and increasingly energised local economy												
<b>Assessment Date</b>					January 2025												
<b>Cabinet Portfolio</b>					Strategic Environment												
<b>Risk Owner(s)</b>					Director of Environment, Assistant Director (Planning)												
<b>INHERENT RISK SCORE</b>					<b>RESIDUAL RISK SCORE</b>					<b>TARGET RISK SCORE</b>							
<b>Likelihood</b>	4	<b>Impact</b>	4	<b>Score</b>	16	<b>Likelihood</b>	4	<b>Impact</b>	3	<b>Score</b>	12	<b>Likelihood</b>	3	<b>Impact</b>	3	<b>Score</b>	9

<b>Lead Officer (s)</b>					<b>Target Date</b>				
Head of Planning					December 2025				

<b>Trigger</b>	<b>Consequences</b>	<b>Mitigation / Control</b>
<ul style="list-style-type: none"> <li>Local Plan is not up-to-date and not underpinned by a robust evidence base.</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 will likely lead to planning applications made to the council on speculative sites within the rural parts of the borough</li> </ul>	<ul style="list-style-type: none"> <li>Local Planning Authorities (LPAs) are required to submit a revised Local Development Scheme to MHCLG, setting out how they intend to bring forward their emerging local plans or face government sanction/intervention. The Government has a clear objective of delivering 1.5 million homes during this Parliament, as sees the emerging Local Plans 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 and more refused applications being approved on appeal.</li> </ul>	<ul style="list-style-type: none"> <li>Monitoring and management of the local plan delivery plan by the Director of Environment and Head of Planning through:</li> <li>Alignment of housing land supply with emerging regeneration strategy.</li> <li>Review of local plan evidence base.</li> <li>Assigning resources to enable delivery.</li> <li>Assigning programme and engagement resources to speed up the process.</li> <li>Review of the Housing Delivery Action Plan and implementation of the interventions identified within the plan.</li> <li>Providing progress updates to senior management and Members.</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 regards 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>A revised Local Development Scheme will be presented to Cabinet on 24 February 2025 for approval. This sets out the timetable for the local plan and the next steps.</li> </ul>

<b>Key corporate documents and processes in place</b>	<ul style="list-style-type: none"> <li>Strategic Housing land Availability Assessment.</li> <li>Local Development Scheme.</li> <li>Local Plan supported by the project plan.</li> <li>Housing Delivery Action Plan.</li> </ul>
---	--

<b>The Risk</b>					<b>STG Building Control Partnership – Licencing of Surveyors</b>					<b>Risk No.</b>		<b>7</b>					
<b>Link to Corporate Objective</b>					#oneborough: a safe, clean, and attractive living environment, enhanced by a sustainable and increasingly energised local economy												
<b>Assessment Date</b>					January 2025												
<b>Cabinet Portfolio</b>					Leader of the Executive												
<b>Risk Owner(s)</b>					Director (Environment) and Deputy Chief Executive, Assistant Director (Planning)												
<b>INHERENT RISK SCORE</b>					<b>RESIDUAL RISK SCORE</b>					<b>TARGET RISK SCORE</b>							
<b>Likelihood</b>	4	<b>Impact</b>	4	<b>Score</b>	16	<b>Likelihood</b>	3	<b>Impact</b>	4	<b>Score</b>	12	<b>Likelihood</b>	3	<b>Impact</b>	4	<b>Score</b>	12
<b>Lead Officer (s)</b>										<b>Target Date</b>							
Head of Planning										September 2025							
<b>Trigger</b>					<b>Consequences</b>					<b>Mitigation / Control</b>							
<ul style="list-style-type: none"> <li>Shortage of qualified/experienced building control surveyors and with the implementation of the licencing requirements this has accelerated the problem with many choosing to take early retirement or leave the profession.</li> </ul>					<ul style="list-style-type: none"> <li>Insufficient numbers of surveyors able to achieve registration resulting in <ul style="list-style-type: none"> <li>➢ Reduction in service delivery or</li> <li>➢ No service delivery if no licences</li> <li>➢ Inability to provide dangerous structures call outs through the day or an Out-of-Hour's service</li> </ul> </li> <li>Surveyors unable to work on certain categories of developments due to the relevant level of licence(s) not being held. Potential additional cost to the council for buying-in licensed surveyors (subject to availability) and potential loss of income</li> <li>Staff retention as licenced surveyors become more marketable particularly to the private sector</li> <li>Insufficiently experienced surveyors to develop our own surveyors</li> <li>Potential cost of subsidising the Partnership's surveyors to be desk-based whilst they achieve the required registration.</li> </ul>					<ul style="list-style-type: none"> <li>Business plan support from Joint Committee Members over the years to develop and bring on the Partnership's own surveyors to build in that resilience with the backing of a comprehensive support package for training, retention and recruitment.</li> <li>Experienced surveyors continue to provide training and mentoring to maintain the development programme and the Partnership is encouraging the experienced surveyors to assist team members in preparing for their registration.</li> <li>Partnership managers work with existing members to provide training and development to help speed up the process of getting surveyors registered and licenced.</li> </ul>							
<b>Key corporate documents and processes in place</b>					STG Building Control Business Plan 2024-28												

**Gravesham**  
Borough Council

