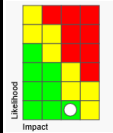
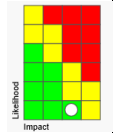
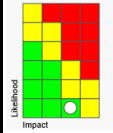
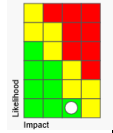

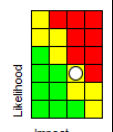


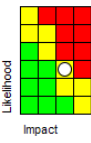
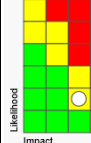

# Ashfield District Council Corporate Risk Register – Analysis

## Quarter 2 2019/20

### Health and Happiness Priority

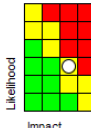

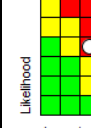
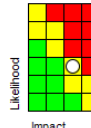
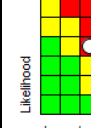
Code	Title	Year end 17/18	Year end 18/19	Qu 2 19/20	Change	Consequences of the Risk Occurring	Ability to Inf.	Resp for Action	Mitigating Actions	Comments	Last Reviewed
							BC Link				
CR200	Kirkby Leisure Centre VFM project – failure to complete the project on time				same	Reputational damage Delay on delivery benefits		Sarah Daniel	Project programme set, reviewed on a monthly basis at internal project team meetings and meetings with project manager	LEP funding - the programme is currently being reviewed by D2N2 as all funding needs to be spent by 31st March 2021. We have confirmed that the project is scheduled to start on site in October 2020 which will allow six months for spend of the £1.5m LEP funding. Confirmation of the funding is subject to submission of an approved business case.  Sport England funding - Sport England are attending project meetings and are reviewing plans for the leisure centre as they develop. Once the Outcomes Framework has been accepted, we should be invited to submit an Expression of Interest. SE have confirmed that they have set aside £1.5m for a potential grant.	11 Oct 2019
CR201	Kirkby Leisure Centre VFM project – overspend impacts the finances of the council				same	Impact on budget and reduction in financial benefits		Sarah Daniel	Budget set-working to the agreed budget. Regular review of capital costs and business case.		
CR202	Kirkby Leisure Centre VFM project – failure to secure match funding				same	Financial impact on the Council		Sarah Daniel	LEP funding - working closely with the LEP to secure £1.5m. . Sport England funding - Committed to £1.5m subject to submission of successful bid.		

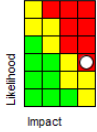
Housing and Homes Priority

Code	Title	Year end 17/18	Year end 18/19	Qu 2 19/20	Change	Consequences of the Risk Occurring	Ability to Inf.	Mitigating Actions	Respons for Action	Comments	Last Reviewed
							BC Link				
(ADC) CR046	[Corporate Risk] Introduction of Universal Credit					<p>• Potential loss of HRA rental income if tenants receiving UC choose not to pay rent (Profiling of current tenants as at 20/2/17 show that there is a risk to the rent roll (circa £11 million) as there will be around 3200 tenants affected. 2380 –high risk and 820 medium risk). This does not include those tenant who have working age partners.</p>	Low	<p>There is a dedicated officer for Welfare Reform in the Tenancy Service Section. This Officer has close links with the DWP.</p> <p>There is a formalised internal process for managing UC cases.</p> <p>There is a UC action plan in place. This needs reviewing regularly especially around resource requirements to manage the process.</p> <p>The Council operates an agency agreement with DWP to assist residents who wish to claim UC</p> <p>The Welfare Reform Group brings together a series of different</p>	Nikki Moss	<p>Universal Credit Claimant tenants are carrying more rent arrears which is impacting on the HRA.</p> <p>As at the 30/9/19, there are 831 tenants claiming UC. 513 of these are in arrears. The total debt for the 513 tenants is £217,743.52.</p> <p>Total rent arrears as at week 27 = £435, 121.45. This includes the arrears attributed to UC claimants as above.</p>	8 <sup>th</sup> Oct 2019
							X				

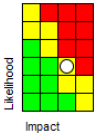
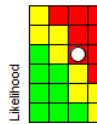
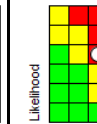
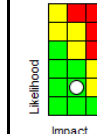
Code	Title	Year end 17/18	Year end 18/19	Qu 2 19/20	Change	Consequences of the Risk Occurring	Ability to Inf.	Mitigating Actions	Respons for Action	Comments	Last Reviewed
							BC Link				
								disciplines and partners to ensure the Council's response to UC remains proactive and robust			
(ADC) CR062	Inability to deliver affordable housing				No change	<ul style="list-style-type: none"> <li>Targets not met</li> <li>lack of new affordable housing going forward</li> </ul>	Low	Use of S106 funding Tackling empty homes Close working with Planning Services Work with private landlords via the Landlords Forum Enforcement to tackle poor standard housing	Phil Warrington	ADC have an ongoing acquisitions programme are currently working on a proposed scheme to provide 22 new Council homes, and are looking at other opportunities to increase stock.  There are also several proposed Registered Provider schemes in the pipeline  No change to risk or likelihood	1 <sup>st</sup> Oct 2019
(ADC) CR081	CR081 Temporary Accommodation – insufficient units to meet demand				same	<ul style="list-style-type: none"> <li>Finance – higher bed and breakfast costs</li> <li>Statute – failure to meet statutory duty</li> </ul>	Yes	Filter in more properties as become available through tenancy voids  Find additional resource to manage properties	P Warrington	No change in assessment. Remains low likelihood but would have critical impact	8 <sup>th</sup> Oct 2019
CR088	Sustainability of HRA business plan and ability to invest in current and new stock				same	Reduction in stock numbers  Reduced rental income  Potential implications for the long term sustainability of the housing service		HRA health check April 2019  Monthly HRA Finance meeting Quarterly  Annual sector benchmarking	P Warrington	Ongoing consideration of proposed rent increase. Approval will have a significant bearing on long term sustainability and investment in current and new stock.	8 <sup>th</sup> Oct 2019

**Economic Growth and Place Priority**

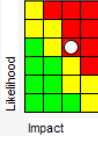
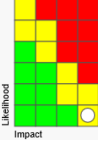
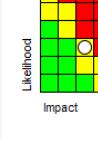
Code	Title	Year end 17/18	Year end 18/19	Qu 2 19/20	Change	Consequences of the Risk Occurring	Ability to Inf.	Resp for Action	Mitigating Actions	Comments	Last Reviewed
							BC Link				
(ADC) CR040	Failure to have adopted LDF / Local Plan				<b>Increased to significant</b>	<ul style="list-style-type: none"> <li>• Diminish ability to stimulate economic growth</li> <li>• Increase likelihood of a developer lead approach to devt.</li> <li>• Maximises potential for a ward of costs against the authority</li> <li>•New approach to plan. High risk. Members Aware.</li> <li>•Local Plan now at preferred approach. Need to publish next stage. Failure to achieve will set back timetable.</li> <li>•If plan requires subsequent revision, will add delays.</li> </ul>	X	Christine Sarris	Need alternative approach to development with Members through adoption of Core Strategy Regular engagement with Members to bring them on board Keeping abreast of latest challenges; work with Planning Advisory Service for proof-reading Work with elected members to address concerns Provide professional guidance Keeping a clear audit trail of engagements with developers and consultees	We are slightly delayed against the last programme on the basis of a further call for sites at the request of members from the Local Plan Steering Group and also delays caused by cancellation of meetings due to the general election. At least 3 month delay to the programme outline in the Local Development Scheme. New milestones will be set as part of the Local Development Scheme update in the next financial year	11 Nov 2019
(ADC) CR086	Loss of planning appeals	new			<b>Increased to significant</b>	surpass the 10% limit and end up in special measures		Christine Sarris	Councillor training, Officer training & monitoring	The risk has slightly reduced given a recent approval on the Rolls Royce site. It is anticipated that an appeal will be withdrawn which further reduces risk. There is still significant risk associated with the Beck Lane Public Inquiry but the potential loss of this will not place the Council in special measures. recent performance has been	15 July 2019

Code	Title	Year end 17/18	Year end 18/19	Qu 2 19/20	Change	Consequences of the Risk Occurring	Ability to Inf.	Resp for Action	Mitigating Actions	Comments	Last Reviewed
							BC Link				
										good and we are below the threshold for intervention	
New	Town Centre Funding – inability to deliver	New	New		N/A	<p>Failure to secure up to £50m of funding for Kirkby and Sutton.</p> <p>Opportunity lost to regenerate and re-purpose town centres and local centres</p> <p>Reputational damage</p>		Sarah Daniel	<p>Programme being developed to ensure milestones are met. Monitored through Pentana, Regen, Board and Discover Ashfield Board</p> <p>Internal resource requirements under review, to ensure sufficient capacity.</p> <p>Specialists will be appointed to support business case development.</p>	On track with development of programme for delivery.	4 <sup>th</sup> Dec 2019

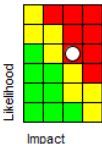
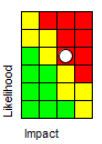
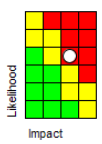
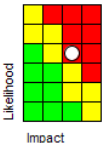
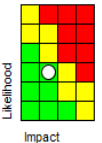
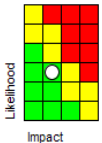
Cleaner and Greener Priority

Code	Title	Year end 17/18	Year end 18/19	Qu 2 19/20	Change	Consequences of the Risk Occurring	Ability to Inf.	Mitigating Actions	Resp for Action	Comments	Last Reviewed
(ADC) CR072	[Corporate Risk] Risk of Government's Waste strategy setting unattainable targets around recycling and service provision. Including the requirement to provide free garden waste service and separate food waste collections				same	<ul style="list-style-type: none"> <li>potential fines from EU</li> <li>reputational damage</li> </ul>	High	Discussions with County regarding innovative options is ongoing	Sam Dennis	No update has been released from the Government's Waste and Recycling strategy consultation and with the upcoming general election it is less likely that any further information will be released this calendar year. The risk therefore remains the same at this stage.	7 <sup>th</sup> Nov 2019
New	Risk of being unable to deliver the annual Big Ashfield Spring Clean.	New	New		N/A	Non- delivery Reputational impact Increased budget Longer term resource requirements for picking up BASC waste through garden waste season and during normal operations		BASC campaigns booked out of garden waste season to ensure lorries and resource available.	Sam Dennis	Lessons learned logs kept through each campaign for ongoing continual improvement. Recognition of the risk of lorry unavailability being designed into the scheme with a reduction in flying skips to free up capacity to support the main collection. Risk of lack of staff mitigated by blanket annual leave restriction across the service and budget allocated for agency support.	4/12/19


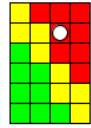

Safer Priority

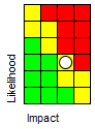
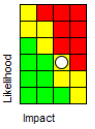
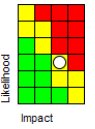
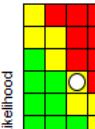
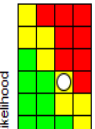
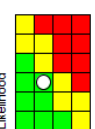
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(ADC) CR083	Failure to Support and Safeguard Vulnerable people				Still medium	<ul style="list-style-type: none"> <li>• Significant adverse outcomes for vulnerable people suffering with mental health issues</li> <li>• Reputation of the council and its partners</li> <li>• Financial impact through lack of working in joined up manner</li> </ul>		<p>Working with NCC and other districts to review opportunity to improve closer working with mental health services</p> <p>Development of a strategy to support and safeguard vulnerable people</p>	Rebecca Whitehead	<p>E-learning training programmes are in development for corporate roll out i.e. Modern slavery. Awareness raising needs taking forward internally on the signs and referral pathways.</p> <p>The Complex Case Panel continues to be well supported by agency attendance however thresholds with agencies can be problematic.</p> <p>Risk in relation to the lack of data and analysis regarding levels of domestic abuse as an example is concerning.</p> <p>Police seconded officer is likely to be retracted by the start of the new financial year - reducing staffing levels in the Complex Case Team.</p>	27 Nov 2019

Innovate and Improve Priority

Code	Title	Year end 17/18	Year end 18/19	Qu 2 19/20	Change	Consequences of the Risk Occurring	Ability to Inf.	Mitigating Actions	Respons for Action	Comments	Last Reviewed
							BC Link				
(ADC) CR029	[Corporate Risk] Failure to make required savings as identified in MTFS				No change	<ul style="list-style-type: none"> <li>•Council cannot fund full range of services in future</li> <li>•Pressure on General Fund reserves</li> </ul>	Medium  √	<p>CLT and Cabinet will work together to identify savings and income generation opportunities</p> <p>Generate additional income</p> <p>For 2017/18, £1m of savings have been identified, and these workshops will continue throughout 2017, with the aim of identifying a further £1m of savings/addition income for 2018/19.</p>	Pete Hudson	Detailed reviews of budgets are being undertaken with relevant portfolio holders to identify further options for change to address the remaining forecast budget gap.	1 Oct 2019
(ADC) CR033	[Corporate Risk] Ability to achieve efficiencies and compliance from procurement reviews / improvement				No change	<ul style="list-style-type: none"> <li>•Penalties for non-compliance with legislation</li> <li>•Inability to meet MTFS savings targets if procurement savings not achieved</li> </ul>	Medium	<p>Agreement of a new Procurement Strategy setting out clear guidance for spending managers</p> <p>Review of Procurement Arrangements (Shared Procurement Unit) to ensure objectives are being met</p> <p>Particular emphasis on small value procurement (under £25k) to ensure that the Council has legally compliant processes in place</p>	Justin Henry	Efficiencies are being delivered as procurement exercises are being completed. Cost avoidance and cashable savings continue to be achieved.	8 Oct 2019



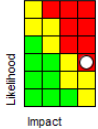
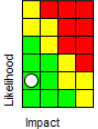
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(ADC) CR003	[Corporate Risk] Members' Ethical Framework – Failure to demonstrate high standards of behaviour	 Likelihood Impact	 Likelihood Impact	 Likelihood Impact	No change	<ul style="list-style-type: none"> <li>•Significant resource to deal with implications of Code of Conduct Complaints.</li> <li>•Potential for negative perception of the Council which impacts upon the Council's reputation</li> </ul> <p>Potentially adverse impact upon the workings of the Council</p> <ul style="list-style-type: none"> <li>•New legislation does not provide "strong" sanctions for breaches to the Code which may make regulation of poor ethical behaviour difficult and leave complainants dissatisfied with outcomes.</li> </ul>	High	<p>Standards and Personnel Appeals Committee approves an annual work programme which includes an annual review.</p> <p>A review of the Members' Code of Conduct Complaints Process will be carried out during 2017/2018 in accordance with the recommendations of the LGA Peer Challenge 2017.</p>	Ruth Dennis	<p>Standards and Personnel Appeals Committee approves an annual work programme, which includes an annual review in March.</p> <p>The Members' Code of Conduct Complaints Process was reviewed, and a revised process approved, in May 2018 in accordance with the recommendations of the LGA Peer Challenge 2017.</p>	25 October 2019
							X	<p>Present Quarterly Complaint Monitoring reports to Standards and Personnel (Appeals) Committee</p>			

Code	Title	Year end 17/18	Year end 18/19	Qu 2 19/20	Change	Consequences of the Risk Occurring	Ability to Inf.	Mitigating Actions	Respons for Action	Comments	Last Reviewed
							BC Link				
										October 2019 and the work is ongoing.	
(ADC) CR005	[Corporate Risk] High levels of sickness absence				No change	<ul style="list-style-type: none"> <li>•Productivity</li> <li>•Financial</li> <li>•Employee morale</li> <li>•Service delivery</li> <li>•Remaining staff placed under increased pressure</li> <li>•Reputational damage</li> </ul>	High	Robust management of sickness absence procedures by managers and robust procedures - Revised Absence Mgt Policy implemented	Karen Barke	Quarter 2 out-turn less than target; short term sickness is low but long term sickness is high involving a small number of cases. All long term cases are being robustly managed in line with the attendance management policy. CLT are actively monitoring via regular review meetings with HR and detailed out-turn monitoring reports to CLT.	03-Dec-2019
							√	Effective monitoring - monthly monitoring reports highlighting service area absence to assist CMG and managers in absence management			
								Employee support mechanisms - Employee assistance programme implemented			
								Appropriate occupational health support – Occ Health provision reviewed			
(ADC) CR032b-a	Business Rates appeals are higher than forecast				Now low	Negative impact a MTFS ; further savings required		A prudent approach is taken to estimating likely successful appeals.	C Scott	Mid-Year analysis of Appeals and CCA data has shown that there has been a significant fall in the number of outstanding Appeals (old scheme - prior to 1st April 2017), which has resulted in a lower assessment of the 2019-20 appeals provision requirement than originally	8 Nov 2019

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							BC Link				
										forecast when the NNDR1 was completed in January 2019.	
(ADC) CR032b-c	Level of central government funding 2020 onwards				No change	Negative impact a MTFS ; further savings required		The Council will contribute to any consultation when proposals are announced, emphasising the need for resources to be allocated to deprived areas.	P Hudson	It is now known that the Spending Review (SR19) will be a one-year review rather than the originally planned 3 years. The expected impact of this has been factored into the update of the MTFS.	1 Oct 2019
(ADC) CR082	Commercial property investment				same	<ul style="list-style-type: none"> <li>Decrease in capital value of the property</li> <li>Inability of tenant to pay or request for renegotiation of rent</li> <li>Reduced income</li> </ul>		<p>Robust monitoring arrangements for portfolio – stability of tenant, stability of market and macro economics</p> <p>Ensure adequate lease length (greater than 7 years)</p> <p>Ensure property investment in most advantageous asset class</p> <p>Ensure tenant has good financial standing and passes regular credit analysis (D+B) Property reserve to offset short term voids</p>	Justin Henry	<p>No change from previous assessment. New CIPFA guidance has been released (18 Nov 2019). Ashfield has a view of the draft prior to the official release, and upon receiving the official update, Ashfield remains compliant with the guidance.</p> <p>The state of the market and the state of the economy remain the same. Tenant performance is broadly good and the portfolio remains low risk currently, all else equal. We will continue to monitor and report as usual.</p>	3 Dec 2019
CR090	Workforce planning – inability to recruit and/or retain filled position to critical posts	New	New	Risk varies depended on post Average of		<p>Inability to provide critical service functions including statutory services whilst vacant</p> <p>Negative impact on delivery of critical functions that directly affect Corporate Plan priorities, productivity, MTFS.</p>		<ul style="list-style-type: none"> <li>Implementation of Workforce Plan</li> <li>Identify Critical Posts and implement strategic plan to mitigate against risks of failure to recruit/retain quality staff to these positions</li> </ul>	Craig Bonar	<p>List of critical roles identified and exercise underway to assess mitigation actions regards retention and recruitment to these posts and/or provision via alternative delivery model.</p> <p>Includes pay and benefits benchmarking; review of market supply,</p>	21 Oct 19


Code	Title	Year end 17/18	Year end 18/19	Qu 2 19/20	Change	Consequences of the Risk Occurring	Ability to Inf.	Mitigating Actions	Respons for Action	Comments	Last Reviewed
							BC Link				
CR100	Brexit – lack of policy decisions	New	New	<p>Likelihood</p> <p>Impact</p>	n/a – new risk	<p>Economic- potential negative impact on funding, investment return, reduced NNDR, increase in contract costs through implications from No-Deal/Brexit</p> <p>Social impact</p> <p>Legislative potential negative impact through legislative changes e.g. employment law, increased tariff taxes</p> <ul style="list-style-type: none"> <li>Partnership/ Contractual potential negative impact of contract failure, increased costs, supply difficulties</li> </ul>		<p>Internal officers working group monitoring impact and headline assessments of potential impact and risk level</p> <p>Briefings to CLT</p> <p>Input and participate in LRF contingency planning and measures including weekly Sit Rep Status Report and Monthly Tele-Conferences</p> <p>Internal Action Plan with lead officer being implemented</p>	Craig Bonar	<p>Internal Officers Group updating business contingency arrangements based on a no-deal EU Exit on 31 October 19. Continuing to monitor community and business impacts</p> <p>Weekly exception reporting currently to LRF Brexit-Green RAG status-no major issues of concern being raised by ADC or LRF in general.</p> <p>MHCLG-Designated Brexit Lead Officer (C Bonar) confirmed.</p> <p>ADC Brexit Lead member (Cllr Blagden) designated</p> <p>Weekly participation in teleconferences covering LRF, Nott's Brexit Leads, MHCLG.</p>	October 2019

**DELETED RISKS**

Code	Title	Year End 16/17	Year end 17/18	Qu3 18/19	Change	Consequences of the Risk Occurring	Ability to Inf.	Mitigating Actions	Resp for Action	Comments	Last Reviewed
							BC Link				
(ADC) CR073a	[Key Risk] Idlewells Market				<p style="color: green;">Risk reduced and finishes in Quarter 3</p>	<ul style="list-style-type: none"> <li>*Loss of Trade</li> <li>*Low occupancy rates</li> <li>*New product doesn't sell</li> <li>*Contract dispute</li> <li>*Landlords dispute</li> <li>*Structural and ME failures</li> <li>•Reputation (public expectations)</li> <li>•Financial – claims</li> <li>•VAT increase to traders</li> <li>•Increase on insurance costs</li> <li>*Delays on opening</li> <li>*Funding agreement not achieved -reclaim</li> </ul>	High	*Contract Programme - Regular inspection and monitoring	Theresa Hodgkinson	Asbestos removed from all designated areas and certificated evidence of work carried out received	01-Feb-2018
								*Business plan produced and updated * Pre letting campaign * Communication plan – monitor/update		Refurbishment completed and handed back to ADC on 11th December 2017  Snagging list created and resolutions sought through 12 month post works period	
								Risk register in place for all aspects of the project/monitored		Market hall 50% occupied on handover. Two new traders in place since handover, further new trader in place mid-February 2018  Communication plan in place for promoting the market as a place to do business	
								Contract signed – Regular meetings/Site/ internal *Quarter monitoring D2N2 grant.		Positive marketing in partnership with Idlewells shopping Centre  First 'Trader day ' held on the 26th January – seven prospective traders interviewed on the day / one verbal acceptance	

Code	Title	Year End 16/17	Year end 17/18	Qu3 18/19	Change	Consequences of the Risk Occurring	Ability to Inf.	Mitigating Actions	Resp for Action	Comments	Last Reviewed
							BC Link				
(ADC) CR074	[Corporate Risk] Overpayment of Housing Benefit				deleted	- loss of subsidy - increasing burden of debt collection	High	Mini re-structure Offsite processing capacity Improved training		The only control over the level of Overpayments we have is the level of Local Authority error Overpayments, which represents less than 10% of the total, and we get all of this back from the Government anyway, so there is no loss for ADC. The bulk of Overpayments are as a result of Claimant error and fraud (failure to notify of change of circumstances), which is outside of our control.  Risk can therefore be removed	
(ADC) CR032b-b	NHS Trusts successfully lobby for charitable status and pay significantly reduced business rates				deleted	Negative impact a MTFS ; further savings required		The Council is supporting the LGA's action against the hospitals.		This matter has now been resolved and the NHS have withdrawn their application  Risk removed	18 Oct 2018
CR084	Failure to be prepared for the Implementation of new Data Protection Legislation (General Data Protection Regulations) in May 2018	new			No change	<ul style="list-style-type: none"> <li>Fine for non-compliance compliant up £14m or 2% gross annual turnover.</li> <li>Reputation – through reporting of breaches and issues/ any form of enforcement action on the ICO website.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Establish GDPR project team</li> <li>Detailed project plan to ensure compliance</li> </ul>	Ruth Dennis and Sarah Hall	Implementation of GDPR occurred in May 2018 and it is suggested that this risk is removed and replaced with a risk relating to the ongoing control and review of protecting personal data in relation to GDPR	Nov 2018

Code	Title	Year End 16/17	Year end 17/18	Qu3 18/19	Change	Consequences of the Risk Occurring	Ability to Inf.	Mitigating Actions	Resp for Action	Comments	Last Reviewed
							BC Link				
(ADC) CRO79	[Corporate Risk] Impact of the impending 1% rent reduction on the Councils ability to invest in new build & existing housing stock				No change	Reduced headroom / ability to borrow in the HRA Revisions required to the 30 year plan Changes / reduced capital programme in the short term Fewer new affordable homes being delivered Reduced service delivery to existing tenants	medium	Wider review of the way the Council manage its housing stock  Reduce spend in the current capital programme  Review viability of 30 year HRA plan	Paul Parkinson/ Nicky Moss	The 30 year HRA business plan has been produced which sets out limitations and efficiencies.  The amenity charge is to be increased from 2019/20. This will generate more income.  Responding to CLT request that risk has been deleted to be replaced with a new risk which has been broadened in relation to HRA business plan viability,	1 Nov 2018
CR085	Loss of Capita financial services				same	<ul style="list-style-type: none"> <li>Potential loss of income to the organisation for a period of time</li> <li>Reputational damage</li> <li>Loss of method of payment with cash until new arrangement in place</li> </ul> Potential loss of transaction data for 1 working day		<ul style="list-style-type: none"> <li>Review current contract</li> <li>Put in place a Contingency plan</li> <li></li> </ul>	Craig Bonar/ Pete Hudson	Capita in March 2019 reported a £272.6m profit for previous year. The year before it reported a £513m loss.  Its balance sheet has been strengthened thanks to a £1.1bn rights issue.  Chief executive Jon Lewis said the firm has "fixed the basics and is firmly on track".  "Our transformation still has some way to go. But I am very pleased with our progress," he adds.  Finance will continue to monitor Capita's performance on the internet. It will provide alerts if there any further problems reported.  Now service level	6 Aug and 1 Oct 2019

Code	Title	Year End 16/17	Year end 17/18	Qu3 18/19	Change	Consequences of the Risk Occurring	Ability to Inf.	Mitigating Actions	Resp for Action	Comments	Last Reviewed
							BC Link				
CR089	Service areas have not designed payment collection processes to meet PCI compliance			 <p>Likelihood</p> <p>Impact</p>		<p>Fines (no prescribed amounts)</p> <ul style="list-style-type: none"> <li>Removal of the capability to take card payments</li> </ul>		<p>Processes to be documented and communicated to staff through robust service planning.</p> <ul style="list-style-type: none"> <li>All service areas to examine and document payment collection processes and procedures which will need to be signed off by the ICT Security Manager.</li> </ul>	J Froggatt	<p>PCI awareness sessions held</p> <p>Tips for service payment design given to IT Security Officer for review and publication on the intranet</p> <p>Now service level</p>	Oct 2019