

Agenda

Audit and Governance Committee

This meeting will be held on:

Date: **Tuesday 21 October 2025**

Time: **6.00 pm**

Place: **Long Room - Oxford Town Hall**

For further information please contact:

Hannah Carmody-Brown, Committee & Member Services Officer,
Committee Services Officer

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Committee Membership

Councillors: Membership 7: Quorum 3: substitutes are permitted.

Councillor James Fry (Chair)

Councillor Roz Smith (Vice-Chair)

Councillor Judith Harley

Councillor Simon Ottino

Councillor Tiago Corais

Councillor Theodore Jupp

Councillor Dianne Regisford

Apologies and notification of substitutes received before the publication are shown under *Apologies for absence* in the agenda. Those sent after publication will be reported at the meeting. Substitutes for the Chair and Vice-chair do not take on these roles.

Agenda

	Pages
1 Apologies for absence and substitutions	
2 Declarations of Interest	
3 Minutes of the previous meeting	9 - 20
Recommendation: that the Committee approve the minutes of the meeting held on 23 July 2025 as a true and accurate record.	
4 Addresses by members of the public	
Public addresses relating to matters of business for this agenda, up to five minutes is available for each public address.	
The request to speak accompanied by the full text of the address must be received by the Director of Law, Governance and Strategy by 5.00 pm on Wednesday 15 October 2025.	
5 Councillor addresses on any item for discussion	
Councillor addresses relating to matters of business for this agenda, up to five minutes is available for each address.	
The request should be received by the Director of Law, Governance and Strategy by 5.00 pm on Wednesday 15 October 2025.	
6 Risk Management Update	21 - 76
Report of: The Group Finance Director	
Purpose of the report: To update the Audit and Governance Committee on corporate and service risks as of 30 September 2025.	
Recommendation(s): That the Committee resolves to:	

1. **Review** the risk management report and **note** its contents.

7 Internal Audit Progress Report - October 2025

Report of: The Internal Auditor, BDO

Purpose of report: To update the Audit and Governance Committee.

Recommendation(s): that the Committee notes and discusses the report.

This report will be provided as a supplement to the agenda.

8 Purchase Cards Internal Audit Report - October 2025

Report of: The Internal Auditor, BDO

Purpose of report: To update the Audit and Governance Committee on work conducted to provide assurance around the use of purchase cards and expenditure.

Recommendation(s): that the Committee notes and discusses the report.

9 Internal Audit Follow Up of Recommendations Report - October 2025

Report of: The Internal Auditor, BDO

Purpose of report: To update the Audit and Governance Committee.

Recommendation(s): that the Committee notes and discusses the report.

This report will be provided as a supplement to the agenda.

10 Internal Audit Annual Report - October 2025

Report of: The Internal Auditor, BDO

Purpose of report: To update the Audit and Governance Committee.

Recommendation(s): that the Committee notes and discusses the report.

This report will be provided as a supplement to the agenda.

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11 External Audit - Verbal Update

Report of: The External Auditors, Ernst & Young

Purpose: To update the Audit and Governance Committee on the progress of ongoing work.

Recommendation(s): that the Committee notes and discusses the verbal update.

12 Dates of future meetings

The next meeting of the Committee is scheduled on 28 January 2026.

Information for those attending

Recording and reporting on meetings held in public

Members of public and press can record, or report in other ways, the parts of the meeting open to the public. You are not required to indicate in advance but it helps if you notify the Committee Services Officer prior to the meeting so that they can inform the Chair and direct you to the best place to record.

The Council asks those recording the meeting:

- To follow the protocol which can be found on the Council's [website](#)
- Not to disturb or disrupt the meeting
- Not to edit the recording in a way that could lead to misinterpretation of the proceedings. This includes not editing an image or views expressed in a way that may ridicule or show a lack of respect towards those being recorded.
- To avoid recording members of the public present, even inadvertently, unless they are addressing the meeting.

Please be aware that you may be recorded during your speech and any follow-up. If you are attending please be aware that recording may take place and that you may be inadvertently included in these.

The Chair of the meeting has absolute discretion to suspend or terminate any activities that in his or her opinion are disruptive.

Councillors declaring interests

General duty

You must declare any disclosable pecuniary interests when the meeting reaches the item on the agenda headed "Declarations of Interest" or as soon as it becomes apparent to you.

What is a disclosable pecuniary interest?

Disclosable pecuniary interests relate to your* employment; sponsorship (ie payment for expenses incurred by you in carrying out your duties as a councillor or towards your election expenses); contracts; land in the Council's area; licenses for land in the Council's area; corporate tenancies; and securities. These declarations must be recorded in each councillor's Register of Interests which is publicly available on the Council's website.

Declaring an interest

Where any matter disclosed in your Register of Interests is being considered at a meeting, you must declare that you have an interest. You should also disclose the nature as well as the existence of the interest. If you have a disclosable pecuniary interest, after having declared it at the meeting you must not participate in discussion or voting on the item and must withdraw from the meeting whilst the matter is discussed.

Members' Code of Conduct and public perception

Even if you do not have a disclosable pecuniary interest in a matter, the Members' Code of Conduct says that a member "must serve only the public interest and must never improperly confer an advantage or disadvantage on any person including yourself" and that "you must not place yourself in situations where your honesty and integrity may be questioned". The matter of interests must be viewed within the context of the Code as a whole and regard should continue to be paid to the perception of the public.

*Disclosable pecuniary interests that must be declared are not only those of the member her or himself but also those member's spouse, civil partner or person they are living with as husband or wife or as if they were civil partners.

Minutes of a meeting of the Audit and Governance Committee on Wednesday 23 July 2025

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Committee members present:

Councillor Roz Smith

Councillor Harley

Councillor Ottino

Councillor Munkonge (Substitute)

Officers present for all or part of the meeting:

Hannah Carmody-Brown, Committee and Member Services Officer

Gurpreet Dulay, Internal Auditor (BDO)

Nigel Kennedy, Group Finance Director

Bill Lewis, Financial Accounting Manager

Jonathan Malton, Committee and Member Services Manager

Scott Warner, Counter Fraud Manager

Lucy Walker, Non-Executive Director (ODS)

Preeti Malik, External Auditor (Ernst & Young)

Roger Martin, Insurance, Risk Management and Business Continuity Officer

Emma Jackman, Director of Law, Governance and Strategy

Chris Urwin, Executive Director - Finance (ODS)

Phil McGaskill, Revenues Service Delivery Manager

Melissa Hope, Organisational Development Manager

Apologies:

Councillor Fry sent apologies; Councillor Munkonge attended as substitute.

Councillor Jupp and Councillor Corais also sent apologies.

It was noted that Councillor Harley may be late.

42. Election of Chair for Council Year 2025-2026

The Committee and Member Services Officer requested nominations for Chair.

Councillor Munkonge proposed, and Councillor Ottino seconded the nomination of Councillor Fry to be elected as Chair of the Committee for 2025/26.

There were no further nominations.

The Audit and Governance Committee resolved that Councillor Fry be elected as the Chair for 2025/26.

43. Election of Vice-Chair for Council Year 2025-2026

The Committee and Member Services Officer requested nominations for Vice-Chair.

Councillor Ottino proposed, and Councillor Munkonge seconded the nomination of Councillor Smith to be elected as Vice-Chair of the Committee for 2025/26.

There were no further nominations.

The Audit and Governance Committee resolved that Councillor Smith be elected as the Vice-Chair for 2025/26.

In the absence of Councillor Fry, Councillor Smith would chair the meeting.

44. Declarations of Interest

None.

45. Minutes of the previous meeting

The Chair invited questions or comments on the minutes.

Councillor Munkonge asked, in relation to the minutes of the meeting held on 20 January 2025, whether issues relating to the recruitment and retention and legal locums had been finalised. The Director of Law, Governance and Strategy provided an update, confirming that whilst the Council still employs multiple locum lawyers, there has been successful recruitment to a post within the planning team. However, for other

roles recruitment has not yet commenced and it was also explained that stable locums are relied upon to support the department at present.

Councillor Munkonge asked, in relation to the minutes of the meeting held on 2 April 2025, specifically page 23, whether comparable information on Cambridge and Watford had been obtained. The Insurance, Risk Management and Business Continuity Officer noted that this information had been included in the report for item 14 on the agenda.

Councillor Munkonge asked, in relation to the minutes of the meeting held on 2 April 2025, specifically page 26, whether the housing benefit recovery comparison requested was now available. The Group Finance Direct committed to bringing this to the next meeting of the Committee in October.

The Committee resolved to **approve** the minutes of the meetings held on 20 January 2025 and 2 April 2025 as true and accurate records.

46. Addresses by members of the public

None.

47. Councillor addresses on any item for discussion

None.

48. ODS: Annual Audit Opinion and Internal Control Environment 2024/25

ODS had submitted a report to update the Audit and Governance Committee.

Lucy Walker, Non-Executive Director (ODS), and Chris Urwin, Executive Director for Finance (ODS), were present to respond to questions.

The Non-Executive Director (ODS) summarised the report, emphasising the ongoing workstreams and improvements being focused on.

The Committee and Member Services Manager left the meeting.

The Chair invited questions from the Committee.

The Chair queried whether Ray Jones was an independent member of ODS Audit Committee; this was confirmed.

The Chair welcomed the list of future audits but noted the conflicts of interest carried forward from previous year. It was asked whether this would be considered as a priority. The Non-Executive Director (ODS) confirmed that this would be considered within the upcoming audits but had been deferred, at the choice of the committee, until October. It was emphasised that it would be considered as a priority, and focused work is ongoing with the ODS lawyer in relation to this.

Councillor Ottino asked how the business is affected by the unqualified audit opinion and requested further context on the matter. The Non-Executive Director (ODS) explained that ODS has not been significantly affected and were progressing with ongoing work successfully. It was emphasised that the matter would be held at the forefront of future plans to inform improvements going forwards.

Councillor Munkonge, in reference to page 33, asked whether ODS now has clear oversight of project management. In reference to page 4, it was also asked whether the poor communication between ODS and Oxford City Council had been resolved. The Non-Executive Director (ODS) explained that project management has been sharpened and the results of this will be evident over time, although further work will still be done to improve further. Regarding communication, the Committee heard that the necessary improvements will be developed over time with the support and cooperation of Oxford City Council; this will involve matters such as updating service level agreements. It was also noted that a lot of communication work is informal and would not be reflected in documentation. The Group Finance Director supported these comments and confirmed that communication between the two bodies is operating positively.

The Executive Director for Finance (ODS) expressed his support for the appointment of the Non-Executive Director (ODS), noting the rigour she brings to the company. The Committee were also assured that although lots of focus is being paid to active improvements, other good work is also ongoing which must not be forgotten. The strong working relationship with the Group Finance Director was also noted.

The Audit and Governance Committee **noted** the report.

The Non-Executive Director (ODS) and the Executive Director for Finance (ODS) left the meeting and did not return.

49. Internal Audit Annual Report and Annual Statement of Assurance 2024/25

The Internal Auditor (BDO) had submitted a report to update the Audit and Governance Committee of work undertaken and the effectiveness of controls in place for the full year.

Gurpreet Dulay, the Internal Auditor, was present to respond to questions.

The Internal Auditor explained that in future years a group opinion would be issued including audits of Oxford City Council and its companies. In response to queries from the Chair, it was outlined how this would take place.

The Internal Auditor summarised the report, noting that it is currently in draft and is designed to inform the Committee of the Internal Auditor's overall opinion of governance, risk, and control within the Council. This report summarises the work done to reach this opinion. The Committee heard that the report does not account for the recent cyber incident that the Council experienced, but that reports to the next Committee would account for this. Overall, the Internal Audit concluded a moderate opinion.

The Chair invited questions from the Committee.

Councillor Munkonge, in relation to page 47 and GDPR, asked whether the matters noted have been resolved since the review. The Director of Law, Governance and Strategy confirmed that work has been done to address issues with GDPR management, however this was hindered by the recent cyber incident which reduced staff capacity and delayed delivery of formal responses. Then Committee heard that the relevant work will be resumed. Furthermore, it was also explained that FOI management has been improved and is now meeting higher standards against statutory requirements. The Director of Law, Governance and Strategy also noted that a new HR system is being sought to deliver FOI training.

The Chair requested that colour photographs be omitted from future BDO reports.

Councillor Munkonge commented positively on the substantial conclusions noted on page 49 of the report.

The Audit and Governance Committee **noted** the report.

Scott Warner, the Counter Fraud Manager, joined the meeting.

50. Internal Audit Progress Report

The Internal Auditor (BDO) had submitted a report to inform the Audit and Governance Committee of progress made against the 2025/2026 internal audit plan.

The Internal Auditor was present to respond to questions.

Phil McGaskill, the Revenues Service Delivery Manager, was also present.

The Internal Auditor summarised the report and noted that a moderate opinion had been determined overall, noting some areas for improvement.

The Chair invited questions from the Committee.

Councillor Munkonge, in relation to page 69 and account payables, noted his concern at the information relating to issues with payment cards, and in relation to page 72, noted the management response which implied other priorities were taking precedent. It was asked when this matter would be addressed.

The Internal Auditor explained that a separate and full review of purchasing cards has been completed and will be presented at the next meeting in October. The Committee heard that this report would highlight some concerns but recognises that progress is being made.

The Group Finance Director explained management have taken action to suspend purchase cards where necessary until such time that the responsible officer has been able to meet approval requirements. The Committee heard that the Group Finance Director is confident that the information will be updated as required and is seeking to ensure that the issues does not emerge again. The Revenues Service Delivery Manager explained that payment card instructions are also being reissued to all officers holding payment cards with procedure notes. Regarding easements, the Committee heard that other areas have taken precedent, and whilst timelines cannot be confirmed, there is a plan to review the easement accounts by the end of the financial year.

The Chair queried how many purchase cards exists within the Council to which the Group Finance Director estimated between 50 and 60. The Chair asked whether this could be reduced to which the Revenues Service Delivery Manager confirmed that a process is currently ongoing to assess the need for each card and explained that assessment is being made of whether some could be swapped for purchase order arrangements instead. The Committee also heard that credit card limits are being reviewed but caution is being paid to ensure support for teams which may need higher limits to respond to emergency situations is maintained. The example of provision of urgent temporary accommodation was provided. The Chair recognised the link between this matter and ongoing work to set up long term agreements with temporary housing

providers. The Chair also supported the need for emergency transactions to be enabled via purchase cards as required.

The Internal Auditor provided a summary of the affordable housing management project which involves a review of how arrangements are overseen, including work with OX Place. It was noted that some low areas of concern had been identified and these were summarised, as noted in the report.

Councillor Harley joined the meeting.

Finally, the Internal Auditor informed the Committee that there may be an additional review of housing allocations in 2025/26. The Group Finance Director explained that was taking place at the request of the Housing Director in response to expectations of the Housing regulator. The Committee welcomed the suggestion.

The Audit and Governance Committee **noted** the report.

51. Internal Audit Follow Up Report

The Internal Auditor (BDO) had submitted a report to update the Audit and Governance Committee on progress made against existing recommendations.

The Internal Auditor was present to respond to questions.

Melissa Hope, the Organisational Development Manager, was also present.

The Internal Auditor summarised the report, noting it as a routine report which assesses the progress of implementation against outstanding recommendations. The Committee heard that the Internal Auditor was generally content with the progress being made however, emphasised that some recommendations are taking longer to close, and timeframes have been adjusted in response. Recommendations on matters relating to GDPR, risk management, and recruitment and retention were listed as examples which remain outstanding.

The Insurance, Risk Management and Business Continuity Officer explained, in relation to risk management, that the service risk register review was completed earlier this month and sent to BDO on 16 July. Due to publishing timeframes for this meeting, this was not included in the report. The Internal Auditor confirmed it would be reported on at the next Committee in October.

The Organisational Development Manager, in relation to recruitment and retention, explained that the necessary policy is ready and awaiting CLT and union approval. It was confirmed that this would be completed by the extended deadline and had been delayed by the introduction of the positive action policy which was signed off at Council on 14 July 2025. The two policies will be launched simultaneously. The Committee also heard that the Council is in the process of procuring a new HR and payroll system which will be due in 2028.

The Chair expressed concern over the timing of installing a new HR system given the upcoming changes resulting from local government reorganisation. It was queried whether this was the appropriate time to be investing money in new systems. The Organisational Development Manager explained that the existing contract cannot be extended, and therefore the Council must adopt a new system. The Committee were assured that legal colleagues are being consulted to ensure that the potential impacts of local government reorganisation are considered within any new contract. The Director of Law, Governance and Strategy explained that when any new local authority is formed, statutory instruments are used to ensure that existing contracts persist. It was emphasised that until such time as local government reorganisation takes hold, business must continue as usual and contract issues will be addressed in the future. The Chair noted issues relating to contract organisation in Buckinghamshire and Nottinghamshire following local government reorganisation and emphasised concern. The Chair queried whether break contracts had been considered, to which the Organisational Development Manager noted that alternative options had been considered at senior levels.

Councillor Munkonge, in relation to pages 90 and 91 and data protection, asked why it was noted in the management comments that the recommendation could not be assessed by BDO. Councillor Munkonge also asked whether, given the recent cyber incident, whether August is still a realistic deadline. The Director of Law, Governance and Strategy explained that BDO have been sent the majority of the necessary data and returned some questions which the Council has not yet been able to respond to. It was confirmed that this would be actioned by September as the Council recovers from the impacts of the cyber incident and the deadline was likely realistic but would be reviewed if necessary. The Committee also heard that the audit focused on GDPR and did not assess Freedom of Information matters, other than in relation to training.

Councillor Munkonge, noting that Oxfordshire County Council uses two Internal Auditors, asked whether Oxford City Council are considering a similar option. The Group Finance Director Nigel outlined government advice which suggests that the Chair of the Audit Committee could be an independent member, however noted that as yet, this Council had not acted on this option. The Committee heard that the Bill which may require this has not been enacted yet but is currently progressing through Parliament. Once this is a legal requirement, the Council will consider the option. The Group Finance Director also explained that the Council has not been identified the need to use two Internal Auditors.

The Audit and Governance Committee **noted** the report.

The Organisational Development Manager and the Revenues Service Delivery Manager left the meeting and did not return.

52. External Auditor Provisional Audit Planning Report

The External Auditor (EY) had submitted a report to inform the Audit and Governance Committee of the proposed audit approach and scope for the 2024/25 audit.

Preeti Malik, the External Auditor, was present to respond to questions.

The External Auditor provided a summary of the report and acknowledged the recent cyber incident which required some timelines to shift. It was noted that work is ongoing to assess necessary resources to support this.

The Chair invited questions from the Committee.

Councillor Munkonge asked firstly, when is it likely that the 2024/25 audit would be completed, and secondly, what is likely to be the situation regarding the qualified opinions from previous years. Councillor Munkonge also asked what the likely implications of the government's suggestion to bring back the National Audit Office may be. The External Auditor confirmed that the 2024/25 audit would be completed by the backstop date of February 2026 and explained that the opinion will be disclaimed due to the opening balances having no assurances. The Financial Accounting Manager provided further context surrounding delays in audit fees nationally.

The Audit and Governance Committee **noted** the report.

The External Auditor left the meeting and did not return.

53. Local Audit Reform

The Group Finance Director had submitted a report to update the Audit and Governance Committee of the Government response to the consultation on Local Audit Reform in England.

Bill Lewis, the Financial Accounting Manager, was present to respond to questions.

The Financial Accounting Manager summarised the report, drawing the Committee's attention to the proposal for independent members on audit committees.

The Group Finance Director reiterated that the Bill currently progressing through Parliament may require the Council to include independent persons within the Audit Committee in the future. The Council will address this when the requirement arises.

The Chair invited questions from the Committee.

Councillor Munkonge emphasised the complexity of local government financial accounting and asked that it be considered how data could be presented in a more accessible manner to encourage more members to be engaged with the topic.

The Audit and Governance Committee **noted** the report.

54. Risk Management Update

The Group Finance Director had submitted a report to update the Audit and Governance Committee on corporate and service risks at 30 June 2025.

Roger Martin, the Insurance, Risk Management and Business Continuity Officer, was present to respond to questions.

The Insurance, Risk Management and Business Continuity Officer provided a summary of the report.

The Chair and the Committee noted accessibility issues with the spreadsheet data included within the report. The Committee and Member Services Officer and the Insurance, Risk Management and Business Continuity Officer committed to working together to display this in a clearer manner for the next meeting of the Committee in October.

Councillor Ottino, in relation to page 192, noted that the Council have only limited ability to mitigate flooding and climate change risks, and therefore commented that there will always be high risks noted. It was asked whether it would be possible to view the data of only the risks which the Council can meaningfully address. The Insurance, Risk Management and Business Continuity Officer agreed that some risks noted within the register are outside the council's control but explained that scoring risks involves consideration of probability and impact which can be managed differently.

The Chair requested that members be offered some training on interpreting and assessing risk management and the risk registers. The Insurance, Risk Management and Business Continuity Officer committed to facilitating this before the next meeting of the Committee in October.

Councillor Munkonge made two suggestions. Firstly, in relation to paragraph 13 on page 199 and risk 0056, it was suggested that this be reclassified as a corporate risk, rather than a finance department risk due to its nature. Secondly, it was also commented that work is undertaken to present Excel spreadsheets in a clearer manner. In response, the Insurance, Risk Management and Business Continuity Officer explained that risk 0056 is classified as specific to the finance department because it has been assessed that there is a high level of pressure present for employees of that specific department. The Committee heard that the finance department requested this be included in the risk register, and that senior managers across the Council review this quarterly. The Group Finance Director provided further context on the risk, noting that classifications are a matter of judgement and can be altered. In response to Councillor Harley, The Director of Law, Governance and Strategy and the Insurance, Risk Management and Business Continuity Officer provided context surrounding the assessment of staff burnout risks across wider Council teams. It was explained that whilst the risk is universally present and assessed across the Council, it can be reflected variably through the risk registers as a result of how each team assesses it against other existing issues.

Councillor Harley queried whether it could be useful for the Committee to be provided with data comparing vacancy numbers and staffing numbers to support their understanding of recruitment and retention issues across the Council. The Director of Law, Governance and Strategy explained that this data could be made available but that it would be of limited use as there are other influencing factors which would not be highlighted through this, such as the increases in workload.

The Audit and Governance Committee **noted** the report and requested the Insurance, Risk Management and Business Continuity Officer offer some training on interpreting and assessing risk management and the risk registers for the next meeting.

55. Investigation Team Annual Report 2024-25

The Group Finance Director had submitted a report to appraise Members of the activity and performance of the Counter Fraud Team for the fiscal year 1 April 2024 to 31 March 2025.

Scott Warner, the Counter Fraud Manager, was present to respond to questions.

The Committee and Member Services Officer reminded the Committee that they would be required to enter confidential session should they wish to discuss the contents of appendix 1 to this report.

The Counter Fraud Manager provided a summary of the report, noting a mistake on page 219: the reference to 2000 delegates was amended to 200.

Councillor Munkonge praised the report and asked whether the role of the Data Manager would be made permanent. The Counter Fraud Manager noted that he would be exploring a business case to make this role permanent next year given that it has proven its value to the Council.

The Audit and Governance Committee **noted** the report.

56. Dates and times of meetings

The Committee noted the dates and times of future meetings.

The meeting started at 6.00 pm and ended at 7.55 pm

Chair
2025

Date: Wednesday 1 October

When decisions take effect:
Cabinet: after the call-in and review period has expired
Planning Committees: after the call-in and review period has expired and the formal decision notice is issued
All other committees: immediately.
Details are in the Council’s Constitution.

To: Audit and Governance Committee
Date: 21 October 2025
Report of: Nigel Kennedy – Group Finance Director
Title of Report: Risk Management Reporting at 30 September 2025

Summary and recommendations	
Decision being taken:	To update the Audit and Governance Committee on corporate and service risks as of 30 September 2025.
Key decision:	No
Cabinet Member:	Councillor Ed Turner, Deputy Leader (Statutory) - Finance and Asset Management
Corporate Priority:	A Well-run Council
Policy Framework:	None.

Recommendation(s): That the Audit and Governance Committee resolve to:
1. Review the Risk Management report and note its contents.

Information Exempt from Publication
Not applicable

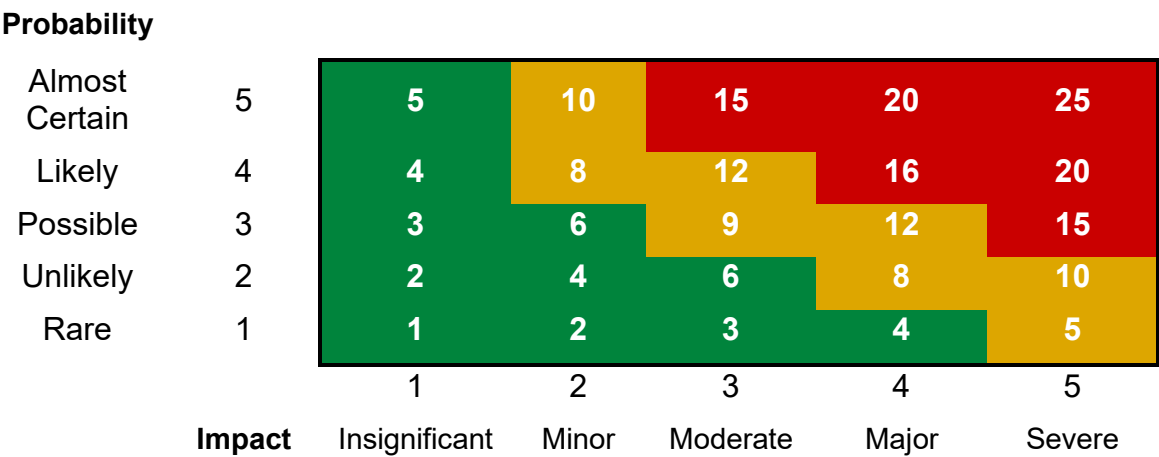
Appendix No.	Appendix Title	Exempt from Publication
1	Corporate Risk Register – Risks and Controls	No
2	Corporate Risk Register – Risks Only	No
3	Service Risk Register – Risks and Controls	No
4	Service Risk Register – Risks Only	No

Introduction and background

- 1. The council undertakes quarterly reviews of risk registers. This report informs the Audit and Governance Committee of the outcome of the review that was completed at the end of September.

Risk Scoring Matrix

- 2. The Council employs a ‘five-by-five’ risk scoring matrix, assessing risks based on probability and impact.
- 3. An identical score can give different results in the matrix. If an event has a high probability but a low impact, it will receive a lower rating. However, the greater the potential impact score, the more likely the event will be categorised as an amber risk on the matrix.
- 4. The risk prioritisation matrix is below, showing scores for red, amber, and green risks.



Risk Identification

- 5. **Corporate Risks** – The Corporate Leadership Team reviews the Corporate Risk Register (CRR) quarterly. Any new risks are incorporated into a revised version of the CRR. The Corporate Leadership Team reviewed the CRR on 18 September 2025.
- 6. **Service Risks** – Service-level risks are subject to periodic review by Directors and Service Managers. The Risk Management Group maintains oversight of all service risks and, during its meetings, assesses whether any should be escalated for inclusion in the CRR. On 26 August 2025, the Group reviewed the Legal, Governance and Strategy, and Planning and Regulation risk registers. The next meeting of the Risk Management Group will take place on 9 December 2025, at which the Finance and ICT service risk registers will be presented and reviewed.

Corporate Risk Register

7. The Audit and Governance Committee most recently reviewed the CRR on 23 July 2025. The CRR for 2025/26 is attached as Appendix 1, including controls, and Appendix 2 showing risks only.
8. The table below shows the number of corporate risks on 30 September 2025 compared with the previous reported quarter.

Current Risk	Q1 2025/26	Q2 2025/26
Red	6	6
Amber	8	8
Green	0	0
Total risks	14	14
New risks	10	0
Closed	8	0

CRR Red Risks

- **1 - Financial Stability**

This risk concerns the Council's ability to implement its strategic plans and corporate priorities amid increasing financial pressure. Key contributing factors include volatility in income and expenditure, inflation-driven cost escalation affecting materials for capital projects, rising service demands, such as temporary accommodation, and broader economic weaknesses, which may depress income streams such as commercial rents and business rates.

- **99 – A utilities infrastructure that does not meet the needs of the city**

This risk identifies that without further investment and partnership working, the city's utility infrastructure will come under increasing strain, adversely impacting citizens' wellbeing and the city's prosperity.

- **100 – Cybersecurity and IT infrastructure resilience**

The risk addresses the failure to prevent and respond to cyber-attacks and ensure that IT infrastructure is fit for purpose and adaptable to future needs.

- **102 – Addressing the causes and impacts of climate change**

This risk identifies the factors that could prevent the Council from prioritising efforts to tackle the causes of climate change and mitigate its effects. Failure to do so would harm both residents and the environment.

- **106 – A failure to deliver Temporary Accommodation strategies to meet demand and increases in homelessness**

This risk assesses the potential consequences if the Council fails to implement effective mitigation measures to control temporary accommodation costs or develop contingency plans to meet the increasing demand for homelessness.

prevention. It also considers the challenges of securing an adequate housing supply through the private rented sector and the Council's development programme.

- **107 – A failure to meet Social Housing (Regulation) Act customer/consumer standards**

This risk evaluates the potential impact if the Council, in its capacity as a landlord, fails to fully comply with the Social Housing (Regulation) Act customer standards, particularly the Safety and Quality Consumer Standard. Such a failure could result in a major incident that compromises tenant safety, leading to sanctions, regulatory intervention, and severe reputational damage.

CRR Amber Risks

- **3 – Workforce stability**

This risk relates to the Council's ability to achieve its future ambitions, which may be undermined by challenges in recruiting and retaining staff in key strategic corporate support areas such as Legal and ICT. It highlights the greater challenge of recruiting staff when there is uncertainty about Local Government Reorganisation.

- **6 – Failure to comply with governance requirements**

This risk addresses the possibility that the Council may fail to comply with the Constitution and governance requirements as set out in law.

- **9 – Political and partnership landscape – Local and national**

This risk concerns uncertainty about the future political landscape at both a national, regional, and local level, as Local Government Reorganisation and Devolution are progressed.

- **11 – Increased demand for services**

- There is a growing demand for Council services. This is driven by sustained cost-of-living pressures, rising accommodation costs, diminishing disposable income, and increasing levels of personal debt.

- **97 – Flood**

This risk highlights concerns over the Council's ability to respond effectively to a major flooding incident. An inadequate response could significantly compromise the Council's capacity to manage the situation. The risk has been reduced from red to amber based on the plans that the Council has and because it is experienced in implementing them.

- **98 – Adverse weather, terrorism, and utility outage**

This addresses the risks of adverse weather, terrorism, and utility outages, highlighting issues that would impact the Council's ability to respond effectively to a major incident.

- **104 – The workforce and public are healthy and safe**

This risk concerns the Council's ability to manage health and safety effectively. Failure to do so could put both employees and the public at risk, potentially resulting in injury, illness, or loss of life.

- **105 – A failure to deliver housing priorities and business plans**

This risk relates to the Council's ability to mitigate financial pressures within the Housing Revenue Account. These pressures will intensify if the Council, as the local housing authority, fails to meet its housing prevention priorities for homelessness or deliver its Housing Revenue Account business plan and Asset Strategy objectives.

CRR Green Risks

There are no green risks in the CRR.

Service Risk Registers

9. As part of the service planning process, all service risks are reviewed. Those no longer relevant are deleted, and any new ones added. The service risk register is attached as Appendix 3, showing risks and controls, and at Appendix 4, showing risks only.

10. The table below shows the number of service risks at 30 September 2025 compared with the previous reported quarters.

Current Risk	Q1 2024/25	Q3 2024/25	Q4 2024/25	Q1 2025/26
Red	11	11	10	12
Amber	43	42	52	56
Green	27	26	32	24
Total Risks	81	79	94	92
New Risks in the Quarter	10	0	25	0
Closed	0	2	10	2

11. Details of the red service risks are as follows:

- **27 - Planning**

External delays - Delays to Council projects arising from external agencies may impact overall Council performance, resulting in missed targets and reduced effectiveness.

- **33 – Property and Assets**

Quality of data and property knowledge – Failure to implement an asset management system capable of storing and analysing data may hinder the Council's ability to effectively plan and schedule work. This could result in delays

to property lettings, difficulties in providing timely insurance information, and increased risk of non-compliance.

- **34 – Law, Governance and Strategy**

Resilience of service – An inability to effectively deliver services required by the Council and to deliver critical projects and support statutory and non-statutory functions will have a direct impact on risk, compliance, expenditure, and income to the Council. Furthermore, inadequate staffing and the requirement for expertise in response to major incidents may necessitate increased reliance on external support or lead to operational delays.

- **35 – Planning**

If Government legislation requiring substantial changes in the planning system results in a need for redesigned processes, then there will be a lack of capacity to meet the changes, and the delivery of local policy objectives will be undermined.

- **46 – Law, Governance and Strategy**

The use of the budget is reactive and therefore, as unexpected corporate issues arise, external legal costs increase, which will lead to an overspend on the legal services budget, and potentially pressure on other service area budgets as they may need to fund work.

- **55 – Law, Governance and Strategy**

Income target not achieved – If the income target is not achieved, additional pressure will be placed on the overall legal services budget, leading to an overspend.

- **65 - Law and Governance**

If the Council's departments and suppliers do not safeguard data there is a risk of a data protection breach and non-compliance.

- **96 – Property Assets**

If there is a lack of legal support, the Council will be unable to meet income, capital receipt, and project targets. Alternatively, external legal spend will be more costly and will result in an increase in financial pressure.

- **112 – Housing**

If tenant involvement governance arrangements and activities are not fit for purpose and do not allow the tenant's voice to be heard, then the Council will fail to meet its responsibilities under the Social Housing (Regulation) Act.

- **113 – Housing**

A failure to evidence the implementation of and adherence to the social housing regulator's consumer standards across housing may result in a C3 grading following inspection.

- **125 – Committees and Citizen Services**

An ongoing contract management and partnership approach to the external leisure provision contract, to ensure stability with its financial performance.

- **126 – Communities and Citizen Services**

Financial savings from community centres. Failure to achieve the necessary savings may result in financial pressure on the Council and/or a decline in the quality of services delivered, as cost-cutting measures may need to be implemented.

Alternative Options Considered

12. None

Other implications

13. None

Financial implications

14. There are no financial implications directly associated with the risk registers, although the management of risk is essential to the operation of the Council, the pursuit of its priorities, and its financial integrity.

Legal issues

15. There are no legal implications directly arising from this report, but having proper arrangements to manage risk throughout the organisation is an important component of good corporate governance and good business management.

Level of risk

16. There is no further risk associated with this report.

Equalities impact

17. There are no equality impacts arising directly from this report.

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Background Papers:

None

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Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
1	Service: Financial Services - Financial Stability - Pressure on income and increased demand for services means that the Council will not be able to deliver its plans and corporate priorities. The cause is fluctuations in the Council's income and expenditure. Increased costs due to inflation impacting the capital programme. Increased demand, including for temporary accommodation. Pressures on the Oxford Model caused by a more challenging client and inflationary increases incurred by Oxford Direct Services, and a need for OX Place to refresh the business plan for developments once the current plan expires in 2033. These pressures could result in anticipated returns not being delivered. A poorly performing wider economy results in a reduction in income including commercial rents and business rates. Insufficient governance leads to overspends, and a failure to deliver savings.	Reduction in services, including to vulnerable people with complex needs. Difficult decisions must be taken by Members and senior offices about resource allocation. Fees and charges have to increase. The Council is exposed to a higher risk exposure outside of its risk appetite. Staff morale and the reputation of the Council is reduced. Unresolvable pressures ultimately lead to government intervention.	Nigel Kennedy	4	4	16		
1							Business Planning process links resources to priorities	
1							Agree a balance four-year MTFP, with no unidentified savings within	Initial budget planning June 2025
1							Ensure companies are on schedule to deliver returns to Council through quarterly monitoring of business plans and by challenging them to deliver annual efficiencies	Company Business Plans agreed by shareholder. Work on clienting and commissioning, ODS budget changes, risk profile of schemes within the OX place, HRA 5 year business plan will all impact on the returns the Council has from its companies. Monitoring of the BP's is ongoing. Full impact of autumn statement to be understood. National policy changes re waste may impact ODS.
1							Rigorous review of plans with service directors who are required to confirm that savings proposals are realistic and are being delivered over the life of the MTFS	Initial budget planning commenced in June 2025. Papers are going back to CLT and Members by 19/9/25
1							Scrutiny of the revenue budget and the MTFP by the finance team, Directors, the Chief Executive, Executive Members and the Scrutiny Committees financial panel over the life of the MTFS and ensuring savings and increased income are on target	Part of budget setting process and timetable. September 2025
1							Robust scrutiny and monitoring of the capital programme, with the Project Management Office overseeing the management of projects with regular reporting to the Development Board	Part of budget setting process and timetable. September 2025
1							Keep abreast of changes to Business rates reforms and Fair funding	Currently there is a Government consultation on reforms that the council will respond to. The outcome will feed into an updated methodology for allocation of retained business rates to local authorities from April 2026 which will be included in the council's MTFP.
1							Ensure Senior Officers and Members are aware of the financial position and of their responsibility to contribute to a balanced budget	Informal Cabinet set up for October to review budget paperwork.
3	Service: People - Workforce sustainability - Delivery of future ambitions is threatened. The cause is difficulty with the recruitment and retention of staff in keys areas such as Legal, ICT and Environmental Health. Affordability, skills shortage, can't compete on pay, increased demand / ambition from OCC, limitations on capacity and ability to change. The position is exacerbated by increased uncertainty caused by the outcome of Local Government Reorganisation being unknown.	Increased workload putting pressure on capacity, resulting in poor morale, impact on wellbeing, high staff turnover, increased sickness, poorer outcomes and an impact on service delivery, reputation, legal challenge, union disputes, resilience, skills.	Gail Malkin	3	3	9		
3							Delivery of an agreed local pay deal with Unions	A pay deal was agreed. Future agreed pay deals will help mitigate this risk.
3							Development and implementation of a pay and grading review to enhance pay in areas where the Council struggles to recruit and where it needs to improve retention.	Implemented new market allowances on 1 May.
3							Continued implementation of Leadership Development to improve manager capabilities and develop future managers and leaders to support succession planning and retain talent. Timeline = ongoing	Aspiring manager third programme to launch in November 2025. Bitesize manager training programme is ongoing. New career series launched for all staff, not just managers and leaders. Will be considering development for middle managers in 2025/26. Manager induction training is delayed because of high work demands. Group coaching for managers will be delivered in Housing Services. Planned work with senior leaders to clarify roles and expectations and improve strategic leadership.
3							Continue workshops on People policies and procedures for managers	plan in place with programme of dates

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
3							Digital skills training programme for all staff	New training opportunities set up and good take up. Sharepoint training delivered. Focus now on Copilot.
3							Continued delivery of occupational health and Employee Assistance Programme provision to support employees and help people back to work, demonstrating our commitment to employee well-being. Timeline = ongoing	Service continues and will be supplemented by interventions to help manage stressful work demands that are currently being developed and will be trialled in Housing.
3							Continued delivery of comprehensive internal communications campaign for the People Programme	completed. this is now business as usual.
3							Continued development of inclusive recruitment practices to improve the diversity of the workforce to better represent the communities we serve, reaching the target of 16.5% of the workforce from minority ethnic groups by 2028.	The Positive Action policy was agreed at Council on 14 July 2025. The Recruitment policy has been updated to support inclusive recruitment practices. The Council has reached the 16.5% target. EDI audit has been completed by Internal Audit team.
3							Development of "Grow our Own" apprenticeships	We will continue to recruit small numbers of apprentices every two years. Now part of agreed talent strategy. Career progression schemes also running in Legal and Planning.
3							Develop succession planning to prepare for gaps created if employee turnover increases and recruitment proves even more challenging because of the uncertainty from LGR. Support employees in preparing for future change and potential selection processes.	Work on succession planning being planned and support for employees to follow in 2026.
6	Service: Law, Governance and Strategy - Failure to comply with governance requirements - Failure to comply with the Council's Constitution and governance requirements as set out in law. Insufficient resources impact on the Council's ability to ensure correct processes are followed. Confusion about roles and responsibilities. Poorly implemented policies. Inexperienced staff lack the knowledge and skills they need. Workplace culture results in insufficient planning taking place leading to time pressures on delivery and corners being cut. Staff workload results in mistakes being made. Pressure of timelines imposed by third parties e.g. grant expenditure deadlines, lead to significantly truncated timelines and competing requirements meaning governance is sometimes overlooked.	A loss of public trust and confidence in the Council's ability to govern effectively. Negative media attention will harm the Council's reputation and image. Elected Members and senior officers face criticism. The Council's ability to deliver services is undermined as important decisions are made incorrectly. Disputes among Members and staff. Exposure to financial mismanagement and loss of grants and funding. Legal challenge and claims and procurement challenges. Decisions being found to be invalid. Delays to projects whilst legal challenges / failure to follow governance processes are concluded and addressed.	Emma Jackman	3	4	12		
6							Clarity about roles and responsibilities for decision making within the constitution	The first constitutional review changes were approved at Council in July 2025 picking up on decision making changes. This will be followed with a detailed review of rules contained within it, such as the finance rules, aiming for prior to the end of the municipal year
6							Correct corporate documentation and guidance in place to ensure that policy is translated to processes; governance around these being there and properly applied	These are in place and available on the intranet however work is also in progress with the procurement team, via the procurement board to produce a flow process chart to assist officers in getting process right for contracts. There is the intention to introduce property rules and grant rules in due course
6							Internal and external audit	Both are engaged, the annual assurance letter goes to the external auditors each year flagging issues and there is senior oversight of the audit plan for internal audit
6							Appropriate level of resources;	There are ongoing issues with the resources in legal department that will be addressed in a forthcoming restructure, however they continue to increase in terms of reduction in capacity and risk with staff leaving due to competitive pay offers at less busy authorities. Committee Services is staffed appropriately at present
6							Training of staff as changes are made, on a refresher basis and as part of an induction	This is waiting on the new HR training system to be procured - hopeful in the current FY - at which point mandatory governance and refresher training will be introduced. Sessions have however been given to CLT and management on governance
6							Ensure culture allows for whistleblowing / challenge and that an up to date policy and process are in place for the management of whistleblowing and challenge	Requirement to review the policy
6							Clarity and oversight of companies and specifically ensuring decisions are taken correctly, in a timely manner and by the correct decision making body	This is in progress - terms of reference for SHJVG have been updated, scrutiny has been reviewed and revitalised. The new Shareholder agreement and articles are approved by the SHJVG and will be finalised and adopted shortly. The work will then need to be undertaken with OCHL but this is difficult whilst they have no company secretary, so work is underway with the MD to support them in addressing this.
6							Ability to disseminate lessons learnt	They are fed back to CLT, reported to Cabinet and Scrutiny have been considering a number of governance issues that have arisen
6							Ensure that systems are in place to monitor and control compliance and updates	This is manually done via legal input in to reports and clearance with them for agendas. There are reps at boards also. This will need a more detailed review once all rules have been refreshed
6							Establish a corporate approach to project management that ensures governance requirements and timelines are factored in and understood from the outset	There needs to be some corporate consideration of this

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
9	Service: Chief Executive - Political and Partnership landscape - local and national - There is uncertainty about the future political landscape at both a national, regional and local level as Local Government Reorganisation and Devolution are progressed. The cause is the new Government devolution agenda, the universal requirement to create Mayoral Strategic Authorities and for the introduction of unitary councils that may lead to increased uncertainty, significant additional work to shape new governance, a challenge to partnership and relationship management, dilution of budgetary control, and the assumption of significant new service responsibilities	The potential loss of focus on city-level inclusive growth and community identity, distraction from BAU work, increased budgetary risk, and negative impact on partnership working.	Caroline Green	4	3	12		
9							Agreed approach using CEX and Oxfordshire Leaders Meeting for LGR - and the equivalent bodies for wider group of councils considering devolution - as main governance bodies for raising and seeking resolution to issues that arise	So far all six Oxfordshire Councils have agreed to continue to work collaboratively through sharing data to enable parallel LGR proposals to be created. At the regional level Berkshire, Oxfordshire and Swindon Councils also continue to cooperate on the development of Devolution proposals
9							Use partnerships, stakeholder networks and relationships with Government to build a compelling case for a Greater Oxford Unitary Council, and unitaries to its north and south, each of which would also have a place on a Thames Valley MSA board.	Multiple workstreams moving forward to build final 3 Unitary Authority proposal. Large stakeholder engagement programme ongoing, involving Oxfordshire and Berkshire MPs, PCC, universities and others. The Cathedral cities group is working collaboratively to share LGR knowledge among Oxford, Cambridge, Exeter, Norwich and other similar cities. Case for Cities lobbying event in Parliament on the 9th September, and at the Labour Party Conference on 28th September.
9							Agree protocol on approach to public engagement on LGR and Devolution with other councils to ensue the Gunning Principles are upheld.	Protocol in place and used by all councils to guide public engagement approach
9							Ensure staff engagement on LGR as required by Statutory Invitation	Briefings provided to all staff. Live briefings offered to all staff and delivered to managers and c100 staff. August Let's Talk had c100 attendees. Joint ODS/Council focus groups conducted.
9							Flexible and robust constitution; processes to facilitate decision making	This will be dealt with as the requirement to formally consult arises
9							Use cross party working groups for major decisions	Arranged for workstreams and will continue as needed, including use of Group Leaders
11	Service: Communities & Citizen Services - Increased demand on services - There is increased demand for services provided by the Council, particularly Customer Services, Council Tax and Benefits. Several factors are driving the growing demand for City Council services, including the persistent high cost of living, high costs of accommodation reducing disposable income and driving debt. This is compounded by rising health inequalities, an ageing population, significant deprivation in certain areas of the city, and the increasing complexity of the challenges residents face. These issues are further exacerbated when the Council fails to fully leverage technology, when residents are unable to access digital services due to digital poverty, and when partner organizations reduce or eliminate preventative services.	The increasing pressure on services and staff, can lead to lower staff morale and a failure to meet statutory obligations. As a result, the Council's reputation may suffer as customer expectations go unmet, and relationships with delivery partners may become strained. Delivering services within budgets and achieving savings targets will become more challenging.	Helen Bishop	3	3	9		
11							Launch of phase 1 of OCC new website. This has already complete been done	
11							Launch phase 2 of OCC website	Phase 2 work ongoing - with the review and update of Revs & Bens and Recycling services completed, to ensure documents are fully accessible, as well information being accurate and clear.

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
11							Ensure strong understanding of factors driving demand through the BIU	Locality plans updated using local insight to ensure need properly understood. This is being used to ensure locality action plans are focused on the right actions.
11							Corporate business planning process to ensure prioritisation within service areas	Corporate Business Plan 2024/25 tracking to April Cabinet. Service Planning under way across all service areas.
11							Increase services available online followed by digital comms campaign: Revenues and benefits forms	Promotion of the web functionality was made in Annual Billing. Further website support is now being designed by civica. This has resulted in a demonstrable upturn in web enquiries especially for Council Tax. Housing portal has also been launched and take up is gradually increasing.
11							Ensure contact centre maximises use of technology	Robotic process automation for general register housing applications. Improvements in train for HMO applications and Bulky Waste service requests. Customer intent and data capture exercise for calls coming into contact centre also scheduled.
11							Embed behavioural insight work into Change Team procedures, train change agents and raise awareness with organisation	
11							Community Services Review	Develop and launch new rent policy for tenants. Going to July 2025 Cabinet. Implement new room booking software. Review fees and charges for each centre being investigated. Reviewing management options
11							Review criteria for grant funding	Report agreed at Cabinet in February. Increased communications to ensure greater awareness and support for community groups to make applications.
11							Deployment of digital skills training programmes in community	Activate learning course developed and deployed in Blackbird Leys. Digital café in Westgate Library
11							Work with partners and agencies to deploy collaborative solutions	Youth Hub in Leys Leisure Centre scheduled to go live in July. Already working with community groups delivery collaborative youth activities. Working with ICB to find co-location opportunities.
11							Corporate organisational structure redesign	
97	Service: Community Safety - Flood - The Council's ability to respond to a significant flooding event would be jeopardised if there was an inadequate response due to inexperience of leaders, or dependence on individuals who become unavailable, and are a single point of failure. Budgets could mean that there are insufficient resources of people and materials to deal with the needs of the affected people, including preparing for the event before it happens. Communication failures within the Council and between partner organisations lead to inadequate coordination in the response.	If the Council does not effectively manage the risk of flood there will be disruption to the life of residents, damage to homes, damage to business premises and they will lose trade and profitability and a failure to comply with our Category 1 responder duties set out in the Civil Contingencies Act 2004. Vulnerable people will be affected, strain will be placed on emergency services and Council services, with greater demands on staff, the reputation of the city as a great place to visit will suffer. Political difficulties arising out of disagreements about accountability for the response including budget and use of resources.	Tom Hook	4	3	12		
97							Flood Protocol setting out the roles of internal teams and the connections with multi-agency responses.	Flood Protocol updated.
97							Internal Incident Management Framework in place that governs internal decision making and communications.	CLT and Service Directors trained in the Council's Incident Management Framework
97							TVLRF Emergency Response Arrangements are in place.	CLT and Service Directors training in Thames Valley Local Resilience Forum (TVLRF) emergency response arrangements relevant for their role: SCG and TCG.
97							Out of hours Teams site.	Out of hours Teams site training has been provided.

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
97							Community resilience plans.	Community Resilience Plans in place for Osney Island and Duke/Earl Street areas. Developed by the community in partnership with the Council, the plans contain how the community will support themselves and liaise with statutory partners before and during an event. Flood warden training run by the County Council will be offered to these communities.
97							Oxford Flood Alleviation Scheme provides bunds and a flood plain channel to direct fluvial flood waters away from residential areas.	In May 2025 the Secretary of State confirmed the schemes Compulsory Purchase Order. Construction is due to start late in 2026 and completion will take 5 years
98	Service: Community Safety - Adverse weather, terrorism and utility outage - The Council's ability to respond to a significant emergency event would be jeopardised if there was an inadequate response due to inexperience of leaders, or dependence on individuals who become unavailable, and are a single point of failure. Budgets could mean that there are insufficient resources of people and materials to deal with the needs of the affected people, including preparing for the event before it happens. Communication failures within the Council and between partner organisations lead to inadequate coordination in the response.	If the Council does not effectively manage an emergency response there will be disruption to the life of residents, damage to homes, damage to business premises and they will lose trade and profitability, and a failure to comply with our Category 1 responder duties set out in the Civil Contingencies Act 2004. Vulnerable people will be affected, strain will be placed on emergency services and Council services, with greater demands on staff, the reputation of the city as a great place to visit will suffer. Political difficulties arising out of disagreements about accountability for the response including budget and use of resources.	Tom Hook	4	3	12		
98							Plans in place for adverse weather, utility outage and Publicly Accessible Places, setting out the roles of internal teams and the connections with multi-agency responses.	Publicly Accessible Locations Plan (PALP) revision drafted. Reconfigured to focus on the national strategy of People, Places and Sectors. Weighted towards Prevention activities as response will be led by the emergency services. Terrorism (Protection of Premises) Act 2025 requires the Council and other partners to undertake standard and enhanced security measures in Publicly Accessible Locations. For the Council these are the Town Hall and community centre. Hostile Vehicle Mitigation progress with the County Council, lead officer identified. Conversations will be taking place with the universities and other relevant partners with a role in protecting streets and public spaces. Utility Outage Countywide plan in place - Oxford will revert to this plan with it's own Action Card. Adverse Weather Plan completed.
98							Internal Incident Management Framework in place that governs internal decision making and communications.	CLT and Service Directors trained in the Council's Incident Management Framework
98							Thames Valley Local Resilience Forum Emergency Response Arrangements are in place.	CLT and Service Directors training in Thames Valley Local Resilience Forum (TVLRF) Emergency Response Arrangements relevant for their role: Strategic Coordination Group (SCG) and Tactical Coordination Group (TCG).
98							Out of hours Teams site.	Out of hours Teams site training has been provided.
99	Service: Economy, Regeneration and Sustainability - A utilities infrastructure that does not meet the needs of the city - Without further investment and partnership working the city's utility infrastructure will come under increasing strain and have an adverse impact on the wellbeing of citizens and the prosperity of the city. The city's utility infrastructure is struggling because the city's population has been growing, with a corresponding rise in demand for housing and new commercial developments, whilst at the same time there has been historic under investment meaning that aging systems are not designed for today's demand. Lack of capacity of both energy and sewage treatment supply have been identified by developers as risks to growth in both the short and long term.	- A lack of utilities infrastructure can lead to restrictive conditions on planning preventing occupation of residential and commercial properties which will put development at risk, as has been seen with the recent concerns around the capacity of the sewage treatment works. A lack of energy supply may mean that new developments do not receive the level of supply needed to enable occupation. New housing and commercial developments may not receive planning permission or become stalled or be scaled back. Businesses may be unable to expand and take on new premises resulting in lost employment opportunities and reduced profitability. The green agenda may be harmed as new infrastructure can not be connected. Old sewage systems may not be able to cope with high rainfall events resulting in more flooding. Under pressure aging systems may fail leading to complaints and a reduction in the perception that Oxford is a great place to live and work.	Clive Tritton	4	4	16		
99							There is a challenge because mitigation is out of the Council's control. However, recent action on the sewage treatment works has shown that the council can reduce the likelihood and impact by bringing pressure to bear, and it needs to continue to do this. Minimum 6 monthly discussions with appropriate utilities providers to understand future modelling and to ensure utilities providers understand the impact of a failure to deliver capacity.	"On energy - Working with the Distribution Network Organisation, SSEN, to profile future growth. Also, not active with the new National Energy Systems Operator (NESO) to help them profile both future growth and strategic sites held up by lack of capacity. We will be engaging key developers in the city to get their input into this process. Submissions to both the DNO and NESO due at the end of July 2025. On waste water - Have established quarterly meetings with all the Oxon LPAs within the Oxford Sewage Treatment Work catchment area for Thames Water and the EA to feed back on progress on planned capacity improvement works. Also a quarterly developer meeting to do the same. the EA and OFWAT are the regulator responsible for ensuring this work and they will report back at these meeting. The EA has confirmed that the Oxford Sewage Treatment Work is one of 20 projects receiving regular oversight at ministerial level.

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
99							Direct access to Government through the Oxford Growth Commission	The Oxford Growth Commission has this as a priority and will be engaging on this issue
100	Service: ICT - Cyber security and IT infrastructure resilience - Failure to prevent and respond to cyber attacks and ensure IT infrastructure is fit for purpose and adaptable to future needs. This could be caused by human error, deliberate targeting, because the Council is a high profile organisation with financial information. Exposure through third party partners. Inability to invest in security improvements. Lack of skilled staff and recruitment challenges. Inadequate funding and prioritisation of IT infrastructure. Complexity of infrastructure and connectivity issues. Readiness and capacity for change.	Inability to provide key public services. Financial losses, fines and reputational damage. Staff wellbeing and morale impacted. Reduced productivity and operational inefficiencies. Increased IT inequality, limited service accessibility. Failure to deliver savings and modernisation.	Rocco Labellarte	4	4	16		
100							Prioritising the Town Hall server room fix to provide infrastructure upgrades	Being progressed as part of the wider Town Hall project.
100							Enhancing cyber security monitoring to adapt to evolving threats	Upgrades funded in the budget and implemented.
100							Security upgrades as a result of the cyber incident in June 2025.	Various immediate improvements actioned in the response to events.
100							Cyber security training for all staff	New training offer has been rolled out and is mandatory for all staff. Periodic test emails are used to check the awareness of staff to the threat of phishing attacks.
100							Full security review being undertaken by independent experts in July 2025.	Report due September 2025.
100							Lessons learnt report after Cyber Incident in June 2025	Report due September 2025.
100							Building redundancy in infrastructure and network teams to reduce single points of failure	Ongoing.
100							Focusing IT efforts on core resilience measures.	Further work remains to do in the response to events and following the report due in September 2025.
100							Reviewing and reinforcing cloud security controls before full migration	Ongoing as part of migration programme from the SCC Data Centre to cloud-hosted services for ICT business applications.
102	Service: Economy, Regeneration and Sustainability - Carbon emissions fail to meet the required targets. Addressing the causes and impacts of climate change - If the Council does not prioritise addressing the drivers of climate change and reducing its effects, both residents and the environment will suffer detrimental harm.This is caused by limited funding that is insufficient to invest in infrastructure, resources and technology. Conflicting priorities divert resources and slow delivery. Changes in government policy can create uncertainty. Staff skills gap to manage projects and work with partners.	- Carbon emissions fail to meet the required targets. Detrimental impact on biodiversity. An escalation in heat, flooding and storms. Resulting in increasing damage to infrastructure, homes and business. Increased energy costs. Increased deaths and reduced health and wellbeing for the population. These consequences have a financial impact and damage the reputation of the Council.	Clive Tritton	5	3	15		
102							Retention of Zero Carbon Oxford as a Corporate Priority & inclusion of annual actions in the Business Plan, that target and support delivery of the 2030 (Council) and 2040 (City) Net Zero targets. Retention of £132,000 annual green gas payment and Net Zero Transition Fund reserve to support fund decarbonisation work.	Good progress is being made. A paper laying out actions for the Council to take forward is due to be received by CLT in September 2025.
102							Council has set a 2030 Net Zero target.	Draft paper recommends renewed focus on buildings and fleet decarbonisation. Creation of working groups with ODS and Property to produce programme and fully costed plans for delivery, to enable Council to make decisions on level of support and resourcing to achieve targets. Council Net Zero Tracker (created in 2019) needs to be updated to align with these outputs.
102							Finance - use of revolving loans and ES reserves (including annual contribution of £132k to Net Zero Transition Fund) - to provide funding for feasibility and focused projects that support council Net Zero targets	Plan for use of reserves and funds established for 25/26 as per Tina Mould

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
102							Programme of Carbon Literacy across the Council to increase awareness	First target numbers achieved. Feedback recommends - course needs to be shortened, updated and relevancy improved to support engagement.
102							Energy efficiency target for Social Housing (95% EPC-C by 2030) is on target to be achieved.	A programme is in place to assess all below EPC-C properties, following these surveys a full programme will be developed using the existing agreed MTFP funding. Depending on measures needed to meet EPC C the 2030 target of EPC C in 95% of Council Owned HRA properties should be achievable.
102							City has a 2040 NZ target	The Council continues to host and support the Zero Carbon Oxfordshire Partnership. Which delivers joint projects that support 2040 target. Risk of achieving 2040 target needs to be reviewed in 25/26.
102							District Heat Network project being led by Oxford City Council - if viable will deliver 5% CO2 reduction by 2030. Buildings emissions are the highest and most difficult sector to decarbonise in Oxford.	Decision due July 2026. Connection due 2030
102							Council has an Electric Vehicle Strategy and Implementation Plan .	Behind. 300 chargers due to be installed across Oxford in the next 2 years. Installation is behind, due to LEVI programme delays, needs to be continued at pace and be maintained after initial funds.
102							Protect manage and enhance Oxford's urban forest	The strategy emphasizes the importance of maintaining, improving and increasing tree canopy cover which will become increasingly important for climate adaption to mitigate flood and heatwaves. The Council does not currently have tree canopy cover targets but subject to the approval process wishes to bring them in.
104	Service: Chief Executive - The workforce and public are healthy and safe - If the Council fails to effectively manage health and safety, both employees and the public could be at risk of harm, leading to injury, illness, death financial loss and regulatory intervention. This can be caused by insufficient resources and funding, limited investment in equipment, technology and systems. Weak enforcement of policies. Lack of regular and comprehensive training leads to a lack of knowledge and skills. Turnover of staff impacts continuity. Employees and managers may not be fully aware of their responsibilities. A workplace culture where there are not shared values and behaviors, and where health and safety is not embedded, with safety being part of every decision and task.	Injury, ill health or death of employees or members of the public. Increased sickness absence of staff . Interrupted service delivery including to vulnerable people. Criminal prosecution of the Council and/or staff by enforcement bodies such as the HSE and the Police. Sanctions including fines, imprisonment and disqualification from office. Responding appropriately to Investigations will take considerable time and resources. Increased budgetary pressures from liability claims and premiums. Increased costs from fines, legal costs and damage to equipment and premises. Media scrutiny and reputational damage.	Caroline Green	3	4	12		
104							Ensuring governance is in place to monitor health and safety performance	<p>The Health and Safety Compliance Board meets quarterly during CLT. The Health and Safety Manager attends. The meeting is chaired by the Chief Executive.</p> <p>The People Safety Board meets quarterly and reports to the Health, Safety and Compliance Board within CLT. Each Quarter the People Health and Safety Board send collated information from all the service areas. The board reviews health and safety performance; health and Safety risks within service areas; it monitors audits, and discusses changes to legislation. Any concerns raised will be escalated to the Health, Safety and Compliance Board at CLT when required.</p> <p>The Property Health, Safety Compliance Board provides assurance that risks related to property health, safety and compliance are effectively managed. The Board meets each quarter and is attended by Director of Development (Chair), Head of Property Services, and the Building Safety and Compliance Manager. A summary report including the decisions and actions from the Property Board will be sent to the Health, Safety and Compliance Board at CLT for oversight. The Board will establish and maintain standards of Property health, safety and compliance in the council that aligns with legal requirements and in accordance with the Health and Safety Policy and Standards.</p>
104							Ensuring compliance with regulatory requirements	Monitor accident and incident report and review accident investigations. Reporting any accidents, dangerous occurrences or disease that are required to be notified to the Health and Safety Executive under the Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). Corporate Guidance and Standards are published on the Intranet. Monitoring risk assessments completed for each service area. Monitoring eLearning training for each service area. Personal Safety Audits completed for Communities & Citizens and Housing.
104							Proper governance of compliance with health and safety policy	People Board and CLT Board is the method of governance.
104							Promoting a health and safety culture, through training, learning lessons and facilitating whistleblowing	Monitoring health and safety training and development. Providing technical/legal advice and information. Health and Safety staff attending Teams meetings as requested to support Managers.Meeting and working with Managers
104							Collaborating with the enforcing authorities. Liaising closely with the HSE and other relevant enforcing authorities, such as the Police and Fire and Rescue Authority, and cooperating with their inspections and investigations	As required. The proactive role for meetings with outside bodies is within the remit of the Safety Advisory Group.

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
105	Service: Housing - A failure to deliver housing priorities and business plans - If the council, as the local housing authority, fails to deliver its housing prevention priorities for homelessness and fails to deliver its HRA business plan and Asset Strategy priorities, then its ability to rebalance HRA financial pressures will be reduced. Service delivery failure, the cost of living crisis and other external factors (most outside of the Council's control), mean homeless prevention activities become unable to meet a sustained increase in homelessness in Oxford and HRA business/asset management activities cost more than forecast.	Reputational Impact - If the Council fails to meet its homelessness duties and landlord obligations, it could result in severely impacting its preparedness for Social Housing Regulator inspection. Financial Impact - The Council is unable to effectively manage Temporary Accommodation demand and supply in the General Fund and its ability to secure value for money for the HRA. Legal Impact - The Council's inability to fulfil its duty to develop and set out its housing homelessness prevention strategy and HRA business plan priorities. Overall Impact: This risk, if realised, would be a systemic risk to the Council's statutory obligations and would lead to negative financial implications	Nerys Parry	3	4	12		
105							A suite of Housing strategies approved by Cabinet in 2024 are in place. These clearly outline the priorities for effectively arresting the increasing homelessness pressures and for effectively managing financial pressures falling on to the council's Housing Revenue Account. Governance and regular monitoring is in place via lead member, cabinet and CLT	Control in place and work is on-going in embedding actions from the strategies.
106	Service: Housing - A failure to deliver Temporary Accommodation strategies to meet demand/increases in homelessness - The Council does not/cannot effectively meet or implement the mitigation priorities for controlling temporary accommodation costs, nor the contingency measures required to address the growing demand for homelessness prevention. Additionally, it falls short in ensuring the adequate supply of housing through the private rented sector and the Council's housing development programme. The cause is service demand and supply failure - the cost of living crisis and other external factors (most outside of the Council's control e.g. changes in Government Policy, increased interest rates, a higher demand for housing etc) mean homeless prevention activities are unable to stop enough households from becoming homeless and requiring temporary accommodation. OCC is unable to move on enough homeless households from Temporary Accommodation to suitable housing, due to not enough new or existing social housing becoming available and a shortage of affordable private rented sector homes.	Reputational Impact - Council fails to meet its homelessness housing duties due to its inability to secure sufficient PRS supply and delayed delivery of its housing supply targets. Financial Impact - 1) Increasing financial pressures on General Fund due to increasing placements in temporary accommodation and costs. 2) Government changes to metrics and formula within the Homelessness Prevention Grant are expected later in the year. This could impact OCC's allocation going forward Legal Impact - Council's inability to fulfil its legal requirement to ensure accommodation offered to discharge its housing duties is affordable and suitable, and as a result, may see an increase in reviews, legal action being taken against the council. Overall Impact - Is limited due to the internal control measures that have been adopted. However, an increase in homelessness due to economic or legislative changes could put this service under strain and lead to a heightened risk level than is currently envisaged under the current regulatory and economic circumstances	Nerys Parry	3	5	15		
106							A set of homelessness priorities were agreed by Cabinet in early 2024. This included a range of enhanced support, acquisition of Private Sector Leasing, access to PRS and housing supply and development targets. Together these mitigating measures are supporting the efforts to arrest demand and Temporary Accommodation costs. Further mitigations agreed in May 25 - including up to 200 new Temporary Accommodation units, revised to face to face offer and reforms to the access panel for single homeless.	Control in place and work is on-going in embedding the range of Temporary Accommodation mitigation actions. The revised Year 3 Actions in the Housing, Homeless and Rough Sleeping will support work in this area Corporately.

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
107	Service: Housing - Failure to meet Social Housing (Regulation) Act customer/consumer standards - The Council, in its role as a landlord, fails to fully meet the Social Housing (Regulation) Act customer standards, particularly the Safety and Quality Consumer standard. A failure could lead to a major incident jeopardising tenant safety, resulting in sanctions, regulatory intervention, and significant reputational damage. Regulatory compliance failure OCC activities and processes fail to comply with consumer standards within the Social Housing (Regulation) Act.	Reputational Impact - The Social Housing (Regulation) Act has been provided with greater powers to "name and shame" underperforming local housing authorities as well as through its new inspection regime it will have the authority to issue unlimited fines to landlords. Financial Impact - Increasing financial pressures on the HRA as a result of its inability to secure value for money through the commissioning of works and services. Legal Impact - Council's inability to fulfil its landlord housing duties - in particular those relating to tenant safety, providing tenants with a platform to raise concerns and fails to maintain properties to the required decent home standard. Overall Impact: This risk would have a knock on impact on the efficacy of the HRA budget with impacts on the reliability and standard of services to tenants	Nerys Parry	4	4	16		
107							Following the approval of a suite of housing strategies at Cabinet, Housing Board is set up to ensure that work is underway and delivered including a 5 year asset programme which will cement a more structured approach to planning maintenance and a reset of the tenant voice approach to embed tenants' voice in the shaping and delivery of services.	Control in place and work is underway to embed actions from the strategies. Additional work is underway to certain elements of the consumer standards.

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Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
1	Service: Financial Services - Financial Stability - Pressure on income and increased demand for services means that the Council will not be able to deliver its plans and corporate priorities. The cause is fluctuations in the Council's income and expenditure. Increased costs due to inflation impacting the capital programme. Increased demand, including for temporary accommodation. Pressures on the Oxford Model caused by a more challenging client and inflationary increases incurred by Oxford Direct Services, and a need for OX Place to refresh the business plan for developments once the current plan expires in 2033. These pressures could result in anticipated returns not being delivered. A poorly performing wider economy results in a reduction in income including commercial rents and business rates. Insufficient governance leads to overspends, and a failure to deliver savings.	Reduction in services, including to vulnerable people with complex needs. Difficult decisions must be taken by Members and senior offices about resource allocation. Fees and charges have to increase. The Council is exposed to a higher risk exposure outside of its risk appetite. Staff morale and the reputation of the Council is reduced. Unresolvable pressures ultimately lead to government intervention.	Nigel Kennedy	4	4	16		
3	Service: People - Workforce sustainability - Delivery of future ambitions is threatened. The cause is difficulty with the recruitment and retention of staff in keys areas such as Legal, ICT and Environmental Health. Affordability, skills shortage, can't compete on pay, increased demand / ambition from OCC, limitations on capacity and ability to change. The position is exacerbated by increased uncertainty caused by the outcome of Local Government Reorganisation being unknown.	Increased workload putting pressure on capacity, resulting in poor morale, impact on wellbeing, high staff turnover, increased sickness, poorer outcomes and an impact on service delivery, reputation, legal challenge, union disputes, resilience, skills.	Gail Malkin	3	3	9		
6	Service: Law, Governance and Strategy - Failure to comply with governance requirements - Failure to comply with the Council's Constitution and governance requirements as set out in law. Insufficient resources impact on the Council's ability to ensure correct processes are followed. Confusion about roles and responsibilities. Poorly implemented policies. Inexperienced staff lack the knowledge and skills they need. Workplace culture results in insufficient planning taking place leading to time pressures on delivery and corners being cut. Staff workload results in mistakes being made. Pressure of timelines imposed by third parties e.g. grant expenditure deadlines, lead to significantly truncated timelines and competing requirements meaning governance is sometimes overlooked.	A loss of public trust and confidence in the Council's ability to govern effectively. Negative media attention will harm the Council's reputation and image. Elected Members and senior officers face criticism. The Council's ability to deliver services is undermined as important decisions are made incorrectly. Disputes among Members and staff. Exposure to financial mismanagement and loss of grants and funding. Legal challenge and claims and procurement challenges. Decisions being found to be invalid. Delays to projects whilst legal challenges / failure to follow governance processes are concluded and addressed.	Emma Jackman	3	4	12		
9	Service: Chief Executive - Political and Partnership landscape - local and national - There is uncertainty about the future political landscape at both a national, regional and local level as Local Government Reorganisation and Devolution are progressed. The cause is the new Government devolution agenda, the universal requirement to create Mayoral Strategic Authorities and for the introduction of unitary councils that may lead to increased uncertainty, significant additional work to shape new governance, a challenge to partnership and relationship management, dilution of budgetary control, and the assumption of significant new service responsibilities	The potential loss of focus on city-level inclusive growth and community identity, distraction from BAU work, increased budgetary risk, and negative impact on partnership working.	Caroline Green	4	3	12		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
11	Service: Communities & Citizen Services - Increased demand on services - There is increased demand for services provided by the Council, particularly Customer Services, Council Tax and Benefits. Several factors are driving the growing demand for City Council services, including the persistent high cost of living, high costs of accommodation reducing disposable income and driving debt. This is compounded by rising health inequalities, an ageing population, significant deprivation in certain areas of the city, and the increasing complexity of the challenges residents face. These issues are further exacerbated when the Council fails to fully leverage technology, when residents are unable to access digital services due to digital poverty, and when partner organizations reduce or eliminate preventative services.	The increasing pressure on services and staff, can lead to lower staff morale and a failure to meet statutory obligations. As a result, the Council's reputation may suffer as customer expectations go unmet, and relationships with delivery partners may become strained. Delivering services within budgets and achieving savings targets will become more challenging.	Helen Bishop	3	3	9		
97	Service: Community Safety - Flood - The Council's ability to respond to a significant flooding event would be jeopardised if there was an inadequate response due to inexperience of leaders, or dependence on individuals who become unavailable, and are a single point of failure. Budgets could mean that there are insufficient resources of people and materials to deal with the needs of the affected people, including preparing for the event before it happens. Communication failures within the Council and between partner organisations lead to inadequate coordination in the response.	If the Council does not effectively manage the risk of flood there will be disruption to the life of residents, damage to homes, damage to business premises and they will lose trade and profitability and a failure to comply with our Category 1 responder duties set out in the Civil Contingencies Act 2004. Vulnerable people will be affected, strain will be placed on emergency services and Council services, with greater demands on staff, the reputation of the city as a great place to visit will suffer. Political difficulties arising out of disagreements about accountability for the response including budget and use of resources.	Tom Hook	4	3	12		
98	Service: Community Safety - Adverse weather, terrorism and utility outage - The Council's ability to respond to a significant emergency event would be jeopardised if there was an inadequate response due to inexperience of leaders, or dependence on individuals who become unavailable, and are a single point of failure. Budgets could mean that there are insufficient resources of people and materials to deal with the needs of the affected people, including preparing for the event before it happens. Communication failures within the Council and between partner organisations lead to inadequate coordination in the response.	If the Council does not effectively manage an emergency response there will be disruption to the life of residents, damage to homes, damage to business premises and they will lose trade and profitability, and a failure to comply with our Category 1 responder duties set out in the Civil Contingencies Act 2004. Vulnerable people will be affected, strain will be placed on emergency services and Council services, with greater demands on staff, the reputation of the city as a great place to visit will suffer. Political difficulties arising out of disagreements about accountability for the response including budget and use of resources.	Tom Hook	4	3	12		
99	Service: Economy, Regeneration and Sustainability - A utilities infrastructure that does not meet the needs of the city - Without further investment and partnership working the city's utility infrastructure will come under increasing strain and have an adverse impact on the wellbeing of citizens and the prosperity of the city. The city's utility infrastructure is struggling because the city's population has been growing, with a corresponding rise in demand for housing and new commercial developments, whilst at the same time there has been historic under investment meaning that aging systems are not designed for today's demand. Lack of capacity of both energy and sewage treatment supply have been identified by developers as risks to growth in both the short and long term.	- A lack of utilities infrastructure can lead to restrictive conditions on planning preventing occupation of residential and commercial properties which will put development at risk, as has been seen with the recent concerns around the capacity of the sewage treatment works. A lack of energy supply may mean that new developments do not receive the level of supply needed to enable occupation. New housing and commercial developments may not receive planning permission or become stalled or be scaled back. Businesses may be unable to expand and take on new premises resulting in lost employment opportunities and reduced profitability. The green agenda may be harmed as new infrastructure can not be connected. Old sewage systems may not be able to cope with high rainfall events resulting in more flooding. Under pressure aging systems may fail leading to complaints and a reduction in the perception that Oxford is a great place to live and work.	Clive Tritton	4	4	16		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
100	Service: ICT - Cyber security and IT infrastructure resilience - Failure to prevent and respond to cyber attacks and ensure IT infrastructure is fit for purpose and adaptable to future needs. This could be caused by human error, deliberate targeting, because the Council is a high profile organisation with financial information. Exposure through third party partners. Inability to invest in security improvements. Lack of skilled staff and recruitment challenges. Inadequate funding and prioritisation of IT infrastructure. Complexity of infrastructure and connectivity issues. Readiness and capacity for change.	Inability to provide key public services. Financial losses, fines and reputational damage. Staff wellbeing and morale impacted. Reduced productivity and operational inefficiencies. Increased IT inequality, limited service accessibility. Failure to deliver savings and modernisation.	Rocco Labellarte	4	4	16		
102	Service: Economy, Regeneration and Sustainability Addressing the causes and impacts of climate change - If the Council does not prioritise addressing the drivers of climate change and reducing its effects, both residents and the environment will suffer detrimental harm.This is caused by limited funding that is insufficient to invest in infrastructure, resources and technology. Conflicting priorities divert resources and slow delivery. Changes in government policy can create uncertainty. Staff skills gap to manage projects and work with partners.	-Carbon emissions fail to meet the required targets. Detrimental impact on biodiversity. An escalation in heat, flooding and storms. Resulting in increasing damage to infrastructure, homes and business. Increased energy costs. Increased deaths and reduced health and wellbeing for the population. These consequences have a financial impact and damage the reputation of the Council.	Clive Tritton	5	3	15		
104	Service: Chief Executive - The workforce and public are healthy and safe - If the Council fails to effectively manage health and safety, both employees and the public could be at risk of harm, leading to injury, illness, death financial loss and regulatory intervention. This can be caused by insufficient resources and funding, limited investment in equipment, technology and systems. Weak enforcement of policies. Lack of regular and comprehensive training leads to a lack of knowledge and skills. Turnover of staff impacts continuity. Employees and managers may not be fully aware of their responsibilities. A workplace culture where there are not shared values and behaviors, and where health and safety is not embedded, with safety being part of every decision and task.	Injury, ill health or death of employees or members of the public. Increased sickness absence of staff . Interrupted service delivery including to vulnerable people. Criminal prosecution of the Council and/or staff by enforcement bodies such as the HSE and the Police. Sanctions including fines, imprisonment and disqualification from office. Responding appropriately to Investigations will take considerable time and resources. Increased budgetary pressures from liability claims and premiums. Increased costs from fines, legal costs and damage to equipment and premises. Media scrutiny and reputational damage.	Caroline Green	3	4	12		
105	Service: Housing - A failure to deliver housing priorities and business plans - If the council, as the local housing authority, fails to deliver its housing prevention priorities for homelessness and fails to deliver its HRA business plan and Asset Strategy priorities, then its ability to rebalance HRA financial pressures will be reduced. Service delivery failure, the cost of living crisis and other external factors (most outside of the Council's control), mean homeless prevention activities become unable to meet a sustained increase in homelessness in Oxford and HRA business/asset management activities cost more than forecast.	Reputational Impact - If the Council fails to meet its homelessness duties and landlord obligations, it could result in severely impacting its preparedness for Social Housing Regulator inspection. Financial Impact - The Council is unable to effectively manage Temporary Accommodation demand and supply in the General Fund and its ability to secure value for money for the HRA. Legal Impact - The Council's inability to fulfil its duty to develop and set out its housing homelessness prevention strategy and HRA business plan priorities. Overall Impact: This risk, if realised, would be a systemic risk to the Council's statutory obligations and would lead to negative financial implications	Nerys Parry	3	4	12		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
106	Service: Housing - A failure to deliver Temporary Accommodation strategies to meet demand/increases in homelessness - The Council does not/cannot effectively meet or implement the mitigation priorities for controlling temporary accommodation costs, nor the contingency measures required to address the growing demand for homelessness prevention. Additionally, it falls short in ensuring the adequate supply of housing through the private rented sector and the Council's housing development programme. The cause is service demand and supply failure - the cost of living crisis and other external factors (most outside of the Council's control e.g. changes in Government Policy, increased interest rates, a higher demand for housing etc) mean homeless prevention activities are unable to stop enough households from becoming homeless and requiring temporary accommodation. OCC is unable to move on enough homeless households from Temporary Accommodation to suitable housing, due to not enough new or existing social housing becoming available and a shortage of affordable private rented sector homes.	Reputational Impact - Council fails to meet its homelessness housing duties due to its inability to secure sufficient PRS supply and delayed delivery of its housing supply targets. Financial Impact - 1) Increasing financial pressures on General Fund due to increasing placements in temporary accommodation and costs. 2) Government changes to metrics and formula within the Homelessness Prevention Grant are expected later in the year. This could impact OCC's allocation going forward Legal Impact - Council's inability to fulfil its legal requirement to ensure accommodation offered to discharge its housing duties is affordable and suitable, and as a result, may see an increase in reviews, legal action being taken against the council. Overall Impact - Is limited due to the internal control measures that have been adopted. However, an increase in homelessness due to economic or legislative changes could put this service under strain and lead to a heightened risk level than is currently envisaged under the current regulatory and economic circumstances	Nerys Parry	3	5	15		
107	Service: Housing - Failure to meet Social Housing (Regulation) Act customer/consumer standards - The Council, in its role as a landlord, fails to fully meet the Social Housing (Regulation) Act customer standards, particularly the Safety and Quality Consumer standard. A failure could lead to a major incident jeopardising tenant safety, resulting in sanctions, regulatory intervention, and significant reputational damage. Regulatory compliance failure - OCC activities and processes fail to comply with consumer standards within the Social Housing (Regulation) Act.	Reputational Impact - The Social Housing (Regulation) Act has been provided with greater powers to "name and shame" underperforming local housing authorities as well as through its new inspection regime it will have the authority to issue unlimited fines to landlords. Financial Impact - Increasing financial pressures on the HRA as a result of its inability to secure value for money through the commissioning of works and services. Legal Impact - Council's inability to fulfil its landlord housing duties - in particular those relating to tenant safety, providing tenants with a platform to raise concerns and fails to maintain properties to the required decent home standard. Overall Impact: This risk would have a knock on impact on the efficacy of the HRA budget with impacts on the reliability and standard of services to tenants	Nerys Parry	4	4	16		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
12	Service: Economy, Regeneration & Sustainability - Increased costs and complexity for waste - The increased costs and complexity in the delivery of the Council's domestic collection service, and ODS commercial waste operations. This is caused by changes in statutory obligations in the waste and recycling system and in funding mechanisms for domestic waste services. Competition in commercial waste services.	If higher costs are not sufficiently matched with increased revenues to support the delivery of the new obligations, this may impact on the funding of other service areas - as domestic waste collections are a statutory requirement. If the net income ODS derives from commercial waste operations reduces this could also impact on dividend payments to the Council which underpin other service delivery.	Clive Tritton	3	4	12		
12							Lobbying for new funding	The Council is lobbying through the Oxfordshire Resources & Waste Partnership over the structure of new funding to cover new obligations. Council and ODS are also in discussions with WODC and Cherwell to look at potential areas of joint delivery to reduce costs.
14	Service: Chief Executive - Partnership working - The devolution governance debate disrupts partnership work because County and Districts might pursue different options for Unitary Government.	Negative impacts on services and projects delivered in partnership with County and partners.	Mish Tullar	3	3	9		
14							Collaborative working and data sharing agreements are in place among Oxfordshire Councils - re LGR. Similar agreements also in place with Oxfordshire, Berkshire and Swindon Councils for devolution.	Collaborative working ongoing though significant delays in data sharing and data access challenges due to complexity of the processes set up. Devolution work with Oxfordshire, Berkshire and Swindon ongoing. Buckinghamshire have been invited to join.
14							Maintain BAU partnership working within Oxon system alongside LGR process	No negative impacts on partnership working more generally across the Oxfordshire system.
14							Joint working with Ox-Cam Growth Corridor and Oxford Growth Commission	Oxford Growth Commission, which involves both Council Leader and CEO, is already having a significant positive impact. Positive progress with Cowley Branch Line.
15	Service: Property Assets - Staff recruitment and retention - Inability to recruit and/or retain staff on proposed terms and conditions in Property Services (particularly in respect of HRA and compliance).Terms and conditions of employment are not sufficiently attractive to attract permanent staff. Most other Councils are trying to attract similar staff from a small pool of available candidates	Required skills and capacity are not available to deliver required work programmes.	Malcolm PEEK	2	3	6		
15							Short term the option is being explored to look at a different way of holding resource with a commissioning model as well as direct delivery by in-house staff. Backfill with temporary staff & contractors where necessary. Use market supplements as necessary. Longer term restructure and recruitment campaign to permanent positions	60%
15							Ongoing monitoring of skill needs aligned to changes in legislation. Flexibility in recruitment - use of agency workers and head hunters, etc.	Ongoing
16	Service: Planning and Regulation: ICT Service Failure - Major service failure due to significant loss of ICT or staff etc. The cause might be major systems failure, a major health pandemic etc	Reduction in staff or premises availability means a reduced service to customers and or a backlog of work to be cleared.	David Butler	3	3	9		
16							A single Business Continuity plan is in place. The business plan work is ongoing as part of the service plan. Loss of staff has been managed in a sustainable manner	85%
17	Service: Planning & Regulation - Regulation of the Private Rented Sector - Opportunity to embed HMO licensing across the City and to regulate the private rented sector. A failure might be caused by systems failure/poor delivery of service; inadequate engagement; non-compliance with regulation/ legislation	Damage to Council reputation and potentially finances; risks to occupiers. neighbours	David Butler	2	2	4		
17							Ensure that the HMO Business Plan is robust and up to date	100%
18	Financial Services: Reputation Management - Failure to deliver an efficient and timely year end process for annual Council Tax and NDR bills, Rents, Garage and leaseholder statements. This can be caused by lack of resources (staff/finance) Upgrades of software not carried out Single points of failure CTR will be administered through Revenues not Benefits Knowledge of requirements Ability to design templates Legislative requirements not addressed	The biggest risk to the Council is reputational. If the bills and notices are not delivered on time the Council cannot collect income due to it and would suffer reputational damage as a consequence. This risk is low until the process starts again in October	Laura Bessell	3	4	12		
18							Commence the move to the cloud based open revenues system in September 2025 and undertake testing for annual billing on the new system. Go live for new system in January 2026. There is a need ensure that the on premises open revenue system is retained until annual billing is complete.	Board and project team established to implement new cloud based system
20	Service: Planning & Regulation - Unplanned Workload - Unplanned workload leading to reactive response and delay or omission of proactive work. This can be caused by complaints, added complexities to existing work, unplanned work demands corporate or external	Delay or omission of programmed work, impact on quality of work if it is rushed or not checked. Reduction in quality of service to customers	David Butler	3	4	12		
20							Improved communications about role and priorities to temper expectations	75%
20							Review with line manager over priorities (saying no or re prioritise)	75%
20							Ensure time allowed for such work in performance agreements. Reviewed through regular 1.2.1 meetings	95%

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
21	Service: Financial Services - ICT - OCC not able to deliver the improvements to ICT systems in a timely and manageable manner. This will result in an inability to deliver ICT Systems that operate in a controlled and robust manner on a timely basis. It can be caused by ICT workplan not adhered to and delayed; System implementation ineffectual leading to delays and / or poor system design and implementation	Increased inefficiencies in work flow leading to increased manual working and worsening collection rates; controls around the system not robust leading to an increased level of reconciliation or data control issues Project plans overlapping so that there is excessive work for staff over a shortened time period Non-compliance with contractual agreements and non-compliance with external standards such as PCN and PCI-DSS	Clare Paterson	3	4	12		
21							Active attendance at project board meetings, planning ahead for projects and being aware of interdependencies	Key systems such as QL and Open Revenues are being moved to the cloud. 10% complete. Work commencing on extending agresso contract and retendering the system
21							Involvement of key staff within Financial Services to identify any issues and feed back to the project team	Key systems such as QL and Open Revenues are being moved to the cloud. 20% complete
23	Service: Property Assets - Income Generation - Income generation from property portfolio is threatened, due to Covid-19 backlog, which is almost cleared, and market forces and cost of living issues. Portfolio is biased towards retail/food and beverage. Market currently patchy and backlog of lease events. Particularly on estate shop portfolio.	Reduced rent leading to budget pressure	Emma Gubbins	3	3	9		
23							Better monitoring system in place and AMS will aid profiling . Constant review of portfolio for regeneration opportunities	Currently on target in Q2
24	Service: Planning & Regulation - Project Delays - Project delays (service specific). Poor project management of projects such as LocalPlan, major Development management case, change projects	Reduced performance, missed targets, ultimately delay to delivery of needed housing on the ground.	David Butler	3	3	9		
24							Clarity of role of project manager in project initiation document	100%
24							Regular reports to Board	100%
24							Tight project management and good reporting from project manager	100%
25	Service: Property Assets - Income reduction due to condition of properties - Inability / delay in letting or increased incentives. Stock returned in poor condition, increased forfeiture. Failure of landlord repairing liabilities	Reduced or delayed rent or capital receipt leading to budget pressure	Malcolm PEEK	3	3	9		
25							Stock condition surveys, AMS, regular and improved inspection regime, Void property process Asset management system. Regular vacant unit meetings and regular inspections. Condition surveys and budget. Implementing timely repairs as required.	Ongoing
26	Service: Financial Services - Failure to recruit and retain key staff. Insufficient quality of applicants to vacancies, current key staff leave to better opportunities. This might be caused by current pay scales not attractive, reputation of Council will not attract new recruits	Vacant posts remain vacant, and existing posts become vacant. Further pressure is put onto remaining staff to fulfil extra tasks	Nigel Kennedy	3	3	9		
26							Development of staff internally, providing development opportunities to existing staff, and providing suitable training to all Ensure Team Leaders and Managers communicate with staff on a regular basis in the current remote working set-up For recruitment to all vacancies, review the job content, specification and pay, exploring different markets to advertise	Engagement with pay and award project. Responding to staff survey. 50% complete. Ensuring 1:1s take place. Appropriate training. Monitoring by Financial Services Management Team
26								100%
27	Service: Planning & Regulation - External Delays - Delays to Council projects caused by outside agenciesDelays by outside agencies - County Council, Consultees, National and Regional Government and other agencies	Reduced performance, missed targets	David Butler	4	4	16		
27							High level intervention if necessary. Greater collaboration is in place on key projects and a proactive approach to intervention/communications	75%
27							Monitoring of applications/ processes/ programmed projects in hand and delays	75%
28	Service: Property Assets - Property non-compliance - Assets becoming non-compliant resulting in Health & Safety failure. (includes trees, green spaces and the like).This could be caused by a lack of monitoring and management	Risk of hazard to people or property, unable to let properties so reduced income. Risk to the reputation of the council and action against the council and officers. Increased insurance costs.	Malcolm PEEK	2	4	8		
28							Additional recruitment of team members and development plan in place to review all areas of building related items New AMS module - ongoing review of compliance data and processes	Complete team in place AMS and alternative being reviewed but now part of Central H&S not only PS
28							Monthly reporting and monitoring of compliance. Asset management system and staff recruitment. Contractor management.	
30	Service: Financial Services - Treasury Management - Safety of investments may be jeopardised by the current economic climate and prolonged volatility in financial markets; banks and other investment institutions not being robust enough to survive future economic changes	Loss of principal investments placed	Bill Lewis	2	5	10		
30							Ensure a robust process of monitoring counterparty changes is carried out	100%
30							Ensure that the TM Strategy is robust and does not allow principal investments to be put at risk	100%

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
30	Service: Communities & Citizen Services -Service standards and quality provision - Service not delivering quality services caused by a lack of resources and employee deployment. Fragile procedures, process and delivery mechanisms. Internal and external monitoring and auditing principles not robust	Failure to achieve industry recognised accreditation (i.e. Quest, Green Flag, ISO). Increased costs. Corporate and service objectives fail to be delivered. Reputational damage. Reduced ability to draw down external funding	Hagan Lewisman				Financial provision set aside for movement in property fund price	100%
30							Management information provided Head of Service on a monthly basis	100%
30							The investment policy ensures all our investments have a financial limit and have a maximum investment period per counterparty	100%
31				2	3	6		
31	Service: Planning & Regulation - Income Targets - Non achievement of income targets caused by the impact of macro-economic issues - falling number of planning applications, visitor spend etc	Not meet budget estimates, Deficit in corporate budget. Ultimately impact on resources available to the council to provide services	David Butler				Monitor through service delivery and stakeholder meetings	100%
31							Timely action through systematic methodology, procedures and internal and external audits	100%
31							Workforce planning and employee development and training regimes	100%
32	Service: Property Assets - Lack of asset management system - Data management processes improvement. No asset management system in place to store and analyse data.	Unable to plan or programme work in a timely fashion, delays in letting of properties and potential non-compliance. Risk of decreased insurance cover or increased premium costs. Lack of active management of portfolio reduces performance.	Malcolm PEEK	3	3	9		
32							Review of Building Control service over 2018/19	100%
32							Promoting services, raise fees and charges, secure planning performance agreements to achieve income and meet targets	100%
33	Service: Law, Governance and Strategy - Resilience of service - Inability to effectively deliver services required by the Council to deliver critical projects and support statutory and non-statutory functions with a direct impact on risk, compliance, expenditure and income to the Council. Inability to react as required in the event of a major incident leading to more outsourcing or delays. Inability to retain and recruit lawyers to permanent posts, leaving the service dependent on locum resources and therefore exceeding salary budget. Capacity and resource issues delaying restructure. Hope to progress by the end of 2025.	Reputational damage; adverse costs; greater reliance on external services and therefore increased costs. Ability to meet Council's own requirements prejudiced.	Emma Jackman	4	4	16		
33							Implementation of Asset Management system enabling programming of works arising from Stock condition survey. Enables compliance and works programmes	Team structure and systems improvements
33							More efficient data management	System procurement in process.
34				4	4	16		
34							Focused recruitment processes, reviewing posts which the Council struggles to recruit to and taking steps to address and targeted use of locums.	A quicker route to market for locums has been agreed with HR which has assisted in filling vacancies quicker. Salaries were reviewed across the teams in line with the corporate review. This has led to the successful appointment to a planning lawyer post following a recent recruitment however in that time neighbouring authorities have increased their pay offer in line with ours and have been successful in recruiting one of our staff to work for them.
34							Trainee Solicitor apprentice to be recruited to in the new structure once current postholders leave their post	The current trainees have qualified but they have a permanent post in the organisation. To replace them with new graduates will require them to leave or a restructure, planned for the latter half of 2025
34							Succession plan in place to ensure continuity of service provision given potential retirements amongst senior staff	
34							Level of service to be provided to Council companies agreed and monitored; demand managed and workloads monitored	There is to be a deep dive with OCHL on services provided by Committee Services and Legal Services. SLA meetings will be held monthly once OCHL have permanent staff in place and work in progress meetings are held once a month with the legal team. There is some need to query the requirement of ODS also on committee services, which seems to be producing more work than the SLA foresaw. This will be picked up and clarified/changes made as needed.
34							Continuous professional development legal training programme maintained and team participation encouraged	This is against a limited budget of approx. £3,000 for 40 staff each financial year. There is a CPD requirement for the qualified lawyers which takes precedent, along with the cost of training for trainee qualification and training needs for new starters. Free training is utilised as much as possible
34							Regular service and Directorate briefings. Meetings held.	
34							AEA Forum monitoring by senior colleagues around the country. Replies to queries swift. AEA consultancy arm accessible.	

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
34							Future review of Election Team in line with succession planning	With retirement likely from some key members of staff following the next election cycle, this will need to be picked up depending on developments with Local Government Reorganisation
34							Undertake a legal structural services review	This is delayed due to capacity but will be brought forward in the latter part of 2025
34							Electoral Services has good relationships with neighbouring and country wide authorities to whom they could turn for advice. Contacts and numbers are on the board in the elections office and maintained in a central record	
34							Reviewing and monitoring the impact of Local Government Reorganisation work across the Strategy Team	Regular one to ones, on going review of workstreams and cross support in place from other teams in the directorate
34							Written procedures, shadowing and cross-skilling in Committee Services team to ensure that there is cross capacity in the team	Written procedures in progress, cross skilling and shadowing well developed. Catch up processes are in place for staff, very strong progress in ensuring cross working in the team
35	Service: Planning & Regulation: Government legislation, Democracy and Localism Bill - Substantial changes to the planning system. Relaxation of Change of Use, Prior Approval regime extended Impact of expectations of politicians and the local community impacting on resources and prioritiesCaused by government legislation leading to need to redesign processes.	Lack of capacity to meet changes coming from government, undermining of the delivery of local policy objectives (e.g. protection of key employment sites). Neighbourhood Plans put pressure on resources and/or seek to challenge City Council	David Butler	4	4	16		
35							Maintain responsiveness and plan for change. Make robust representations to Government where appropriate. Maintain a dialogue with groups wishing to bring forward Neighbourhood Plans.	100%
36	Service: Communities & Citizen Services- Insufficient revenue and capital for each proposed development. Caused by current economic climate/Comprehensive spending review	Developments do not take place	Hagan Lewisman	3	3	9		
36							Leisure Delivery Board Overview	100%
36							Solid business case developed for each development	95%
36							Project Board overview	100%
37	Service: Property Assets - Income Targets / high costs - Non achievement of Town Hall income targets caused by the impact of economic circumstances; delays in building maintenance, major disruption to business e.g. fire, major repairs.	Reduction in income and revenue	Malcolm PEEK	2	2	4		
37							Implement sales & marketing plans including on-going review of the product offered and quality of the facilities available for this	
37							Monthly finance review and forecasting, adjust business plan accordingly.	
37							Full review of town hall income and expenditure model.	
38	Service: Planning & Regulation - Opposition to emerging statutory plans - Opposition to emerging statutory plans, and to planning applications and decisions; A) vocal and organised local opposition before decision; B) opposition at Examination or committee stage; C) Legal Challenge after Adoption or planning decision. Caused by local public, groups, organisations or political parties object to policies in emerging documents and choose to use many and all avenues to express objection, including some outside normal procedures and all drawing a lot of media attention. Or opposition to planning applications at, pre- application, after validation. Committee and post decision stages	Delay, extra costs, reputational risk, possibly amendments to policies.	David Butler	3	3	9		
38							Raise quality of community engagement as far as possible within available resources to flush out and address community concerns at an early stage in the process	100%
38							Communication strategy to be developed for all key planning & regulatory projects/consultations/communications particularly Local Plan. Work collaboratively on objections raised & provide additional evidence.	100%

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
40	Service: Communities and Citizens: Budget and Income - Trading Income from Event hire caused by changes to Broad Street, COVID-19, the cost of living impact on the events sector and targeted campaigns against event organisers	Budgeted Target not met	Paula Redway	3	2	6		
40							Event process to be amended	20%
40							Create and communicate Outdoor Venue Guide	100%
40							Fees & charges amended as part of the budget process	100%
40							Recruited an Events Officer	100%
40							Implement Corporate Debt policy - not needed as the target has already been met no longer necessary	0%
42	Service: Communities and Citizens - Breach in H&S leading to the closure of a building, injury/fatality/ closure of leisure facility and/ or service disruption caused by failure of health and safety management and monitoring	Risk of injury or death to persons. Reputational risk. Financial claims. Risk of facility closure or service disruption	Hagan Lewisman	2	4	8		
42							Monitoring through both internal and external audits and regular governance meetings	70%
42							Lead Officer with experience, knowledge and understanding of compliance. Monitor through service delivery meetings. Performance and pay mechanisms for the leisure provider. Timely action through systematic methodology and procedures. Review ODS governance.	70%
45	Service: Communities and Citizens - Loss of key staff members - Prolonged absence or badly planned leave may result in the service area not delivering on its objectivesThis might be caused by staffing structure being quite tight, meaning that there can be resource issues	Non delivery of service objectives	Helen Bishop	3	3	9		
45							Regular governance and team meetings effective attendance management	
45							Monitor through service delivery meetings	100%
46	Service: Law, Governance and Strategy- External Legal Resources - The use of the budget is reactive and therefore, as unexpected corporate issues arise, external legal costs increase, which will lead to an overspend on the legal services budget, and potentially pressure on other service area budgets as they may need to fund work.This is caused by the unpredictability of costs which may arise. Due to increase demand in client departments for legal support, capacity issues continue which has an impact on external legal advice requirements. Inability to use usual procurement route of EM Lawshare Framework meaning using higher priced frameworks as an alternative.	Budgetary pressure	Emma Griffiths	5	3	15		
46							Identification and use of framework arrangement enables more robust budgeting	EM lawshare has closed due to overspend but the Council is using others available with fixed fees. Some firms honour the EM Lawshare rates but we are finding we are utilising a wider range of firms due to the increase in the sector relying on external advice and the bids for opportunities by firms reducing based on their capacity issues.
46							Close liaison with internal clients to secure appropriate budget for projects requiring external legal services	Work to be done on budget setting process in terms of tracking and reflecting the impact on the team and therefore external spend.
46							Use of external legal advisors limited & controlled (prior approval of Head of Service/Legal Services Manager required); presumption - internal legal team to be relied upon unless no expertise/resource	There have been some issues with departments securing their own legal advice, these have been addressed to ensure budget control, but it does pose an ongoing risk as we are not aware until invoices are due to be paid. This will be emphasised to CLT and asked to cascade
46							Active management of budget & issues of concern flagged at budget monitoring meetings	This is done but due to capacity issues in finance there have been delays with this years budget and also with regular monitoring. This includes not having details on the budgets for the EA team and Strategy team at present which were moved in to the directorate at the start of 2025. These have now commenced monitoring and management in July. At present there are budgetary pressures in Electoral Services and Legal Services, the latter seeing a significant increase in the need to externalise work and that level of working increasing with frequency.
47	Service: Communities and Citizen Services - Insufficient resource and market demand to deliver financial plan - A stringent focus is on this work, although the macro environment continues to increase the challenges. There is a risk of there not being enough resource (staff time), and/or market demand to deliver the level requiredNot enough staff time / insufficient demand for additional activities	Reduced delivery of efficiencies	Helen Bishop	3	3	9		
47							Regular governance and team meetings effective attendance management	
47							Undertake feasibility works and monitor through SPM	90%
48	Service: Planning & Regulation- Public Health Protection - Threats to public health eg., from food borne communicable disease. Uncontrolled spread of diseases; illness and possible deaths; damage to Council reputation.	Failure to adequately control/respond to outbreaks.	David Butler	3	3	9		
48							Competent and experienced specialist staff; effective links with Public Health & the UKHSA; protocols for outbreak and control.	90%

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
51	Service: Financial Services - Budget Management - Inability to forecast outturn effectively due to limited or incorrect information. There are significant efficiency savings and service reductions across the board as a result of budget process, and these may be difficult to deliver, or to understand if they will be delivered timely.	Increased use of balances or further reductions to be identified	Clare Paterson	2	2	4		
51							Regular forecast updates ensure the Council stays within budget	50%
51							Robust challenges by MAs and BPs during the budget monitoring process	50%
52	Service: Communities and Citizen Services - Safeguarding - Safeguarding vulnerable groups including children. Poor training of and recognition of safeguarding principals. Poor monitoring and compliance regimes	Risk to Council reputation. Risk of allegation. Risk to public safety	Hagan Lewisman	2	4	8		
52							Staff Training	95%
52							Effective training, induction and team meetings in place	90%
52							Lead Officer with experience, knowledge and understanding of compliance requirements.	100%
52							Relevant and timely processing of criminal record checks	100%
52							Timely action and monitoring through systematic methodology and procedures	100%
53	Service: Law, Governance and Strategy - ICT - System failure without cloud based systems will significantly impact on the Council being able to meet statutory obligations and will impact on the delivery of corporate priorities and decision making. Risks generated from unauthored access from outside actors, ICT issues such as server failure and failure of third party systems and devices	Failure to meet statutory obligations, inability to take decisions and protect the interests of the Council	Emma Jackman	3	3	9		
53							Electoral Services are developing contingency plans in the event of ICT failures	This worked to a degree during the current cyber event, however it has become clear that a plan for being cut off from government systems and documented process for reconnecting is needed. In addition there needs to be a more robust data cleansing carried out of data held historically
53							Committee Services have contingency plans in place for ICT failures	These were tested and worked during the recent cyber issue, one thing that was identified is the need for access to old minutes, with readily accessible templates outside of the system should Mod.gov go down and also should there be no ability print
53							Legal Services have contingency plans in place for ICT failure	Iken is cloud based which means it is more robust in terms of access however printing does need to be considered and alternatives to email in the event of a total ICT failure, including access to postage
53							Strategy & Policy have contingency plans in place for ICT failure	
53							Moving to cloud based solutions for each of the ICT systems – Elections and Information Governance done, IKEN and Mod.gov to be progressed	Elections and Committee Services are in progress moving to cloud based solutions, with systems procured, Legal is on a cloud based platform. EAs and Policy and Strategy do not have specific systems beyond corporate ones
53							Encouraging regular attendance at ICT sessions when rolled out such as One Drive, Sharepoint etc	Attended as arise - some of the service is yet to migrate to sharepoint therefore this will be done as they are migrated
54	Service: Financial Services - Corporate Fraud - Suppliers set up on payment system that are not genuine or requests to change bank account details that are not genuine. Third parties attempt to defraud the council	Payments being misappropriated, loss of public monies	Annette Osborne	2	3	6		
54							All new suppliers are fully checked and vetted	100%
54							Bank details are checked by an online checking system	100%
54							Monthly exception reporting of any changes made	100%
55	Service: Law, Governance and strategy - Legal Income - Income target not achieved placing pressure on the overall budget of legal services leading to overspend.This would be caused by an inability to manage or control demand of work which generates income	Budgetary Pressure	Emma Jackman	4	4	16		
55							Mapping and review of work coming from clients who generate income, for example Planning, Fraud, Regulatory functions and capital projects	
55							Proper time recording in the Legal Services team, monitored and reported upon monthly	
55							Active management of budget & issues of concern flagged at budget monitoring meetings on a monthly basis	
55							Looking at base budgets and undertaking a review of "under the line" funding vs demand, as budgets are based on capacity and demand approximately 15 years ago	This has been done with regards to HRA property based work but needs to be undertaken across the board and within the HRA for development based work and litigation - needs input from finance which is not possible due to capacity at present
55							Regular review of the suspense account for unallocated payments	This will be raised with finance and looked at on a monthly / quarterly basis as their capacity dictates

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
55							Keep fees and charges under review to ensure in line with other Councils and cost recovery – annually	Reviewed each year at budget setting
56	Service: Financial Services - Management effectiveness and employee ability to deliver services - Excessive pressure placed on staff and managers. Caused by increased workloads and increased volumes of emails and online meetings in addition to increasing demands arising from the "day job"	Staff burnout; increased incidence of stress; lack of capacity to deliver work demands	Nigel Kennedy	3	4	12		
56							Manage corporate expectation of timescales and delivery	Ongoing process
56							Prioritise and manage performance and workloads to ensure that the work is manageable and identify early problems	Ongoing process
56							Staff away day sessions and staff interaction	Away day has been arranged
56							Team meetings and fortnightly on to ones.	
57	Service: Communities & Citizen Services - Complaints Handling - Failure of corporate complaints process resulting in Ombudsman intervention. This might be caused by a reliance on limited number of officers	Reputational risk. Additional complaints and/or ombudsmen intervention.	Helen Bishop	4	3	12		
57							Alternative officers identified by Chief Executive; Access Head of Law and Governance to complaint records possible via M drive.	100%
58	Service: Financial Services - Health & Safety - Staff are subject to volatile situations in the course of their duties and possible harm. They have robust & challenging conversations with subjects of investigation during interviews and visits leading to escalation tension and possible physical assault.	Staff subject to harm and subsequent short or long-term sickness, reduced resources.	swarner2@oxford.gov.uk	2	2	4		
58							All customer-facing staff trained in conflict resolution & comply with team processes on ensuring personal safety, including use of personal attack alarms, smartphone location app, lone worker devices, providing whereabouts information in advance of visits taking place. Body Worn Video devices are also now being used by officers. Sometimes whatsapp live location is also used. Monthly monitoring at staff meetings.	These controls are in place
59	Service: Communities & Citizen Services- Community Cohesion Erodes - The risk that social and community cohesion will be negatively affected, detracting from the Council's aims to encourage strong and active communities. Britain's exit from the EU, shifts in national politics, and subsequent shifts in society's perceptions.	1.Uncertainty and instability in political climate leads to social and political polarisation - this in turn could lead to political fallout/shifts in management and risk of the council developing a bad reputation 2.Political instability means social instability / unrest, leading to higher rates of hate crime. Deepening cleavages in society divides communities, with settled communities feeling neglected by local authorities in favour of new/emerging communities - diversity is seen as a threat for some. 3. Social unrest can have negative effects on health, which carries risk of widening existing health inequalities across the city.	Helen Bishop	3	3	9		
59							Encourage dialogue between communities (existing and new / emerging) through development of existing and potential community and health & wellbeing partnerships with clear area priorities. Re-energise and maintain clear communication and community / stakeholder engagement strategies. Consider how strategy matches public perceptions / political agenda and refresh council values to reflect these.	60%
59							This is a central theme to the Thriving Communities Strategy that has been agreed by Council in January 2023.	70%
60	Service: Financial Services - Budget and Income - Failure to deliver profiled trading income due to external factors. Caused by reduced appetites for external clients and partners to spend on counter-fraud services due to cost of living crisis, dwindling council finances, politics or competing priorities	Trading income targets not achieved, medium term financial plan compromised, budgetary overspend.	swarner2@oxford.gov.uk	1	2	2		
60							Mitigated through enhanced business development activity, exhibiting at relevant conferences and delivery of the Oxford Annual Fraud Conference in the Town Hall. Business Plan and Marketing Strategy in place.	These risk controls are in place
61	Service: Financial Services - Performance - Failure to achieve service plan targets and objectives due to unplanned staff absence or turnover including sickness. Some fixed term contracts in the team increase risk of staff looking to alternative roles with other organisations.	Targets not achieved, trading income compromised, inability to service external contractual commitments	swarner2@oxford.gov.uk	2	2	4		
61							Resilience contract in place with Reigate and Banstead Council for assistance when needed. Use of master vend recruitment agency where required.	75%
62	Service: Law, Governance and Strategy - Budgetary issue - Increase in the cost of postage by Royal Mail causing budget pressures. The rise in the cost of postage has increased in recent years (with another in-year rise of 15% due)	Pressure on budgets beyond what is funded	Martin John	3	3	9		
62							A bid will be submitted to the Council to increase the postal element of the electoral services budgets (both elections and elec reg)	
64	Service: Law, Governance and Strategy - FOIA and DPA compliance - Failure to comply with statutory deadlines in terms of information Requests and Data Subject Access Requests. Failure to properly manage personal data. Failure of other council departments and officers to contribute and approve in timescales required	Reputation risk, ICO action could result.	Emma Jackman	3	3	9		
64							Set up the new management system for information governance to ensure reminders, prompts, and communications are managed with internal teams	This will need to be reviewed in 2027 with the retendering of the system

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
64							Corporate training (compulsory) to be pushed to ensure that the council has maximum take up	This is contingent on a new corporate training system which is in the process of being procured. In the mean time monitoring of take up of training is not accurate but mandatory training remains in place. CLT are aware of this issue
64							Undertake departmental audits of data retention and tie in with migration to One Drive and SharePoint	This has been undertaken and work was substantially complete however due to the cyber incident there is a need to revisit it and also the internal audit, which will be considered in July. Once all completed it needs to be reported back to CLT and since the cyber incident there is a need to deep dive in to some areas.
64							Review retention policies and processes going forward to ensure future management of information is properly undertaken	This has been done but due to issues identified in the cyber incident it needs to be revisited - there will be a knock on impact on other areas of programmed work in the team. It will in any case be repeated annually and reported to CLT. There is a need to ensure a review is undertaken of some areas. This is a priority subsequent to the recent cyber issue
65	Service: Law, Governance and Strategy Data Protection - Data Protection Breach and Non-Compliance with Data Protection Law caused by a failure of the organisation to adhere to data protection law would cause capacity and work implications issues for the team. Outside actors having unauthorised access to data. Failure of the Council's departments and suppliers to properly safeguard data	Increased workload on a small team. Organisation could suffer reputational damage and/or have fines levied against them by ICO. Reputational risk for the service and Council. Financial penalties for Council and employees. Potential litigation against the Council with damages and adverse costs	Emma Jackman	4	5	20		
65							Review incoming potential changes under the Data (Use and Access) Act 2025 and amend practices and processes as necessary	We will map the progress of its implementation and coming force following royal assent on the 19 June 2025 and report to CLT on any changes required
65							Embed actions following the internal audit review of data protection in 2025 and review in light of recent cyber issues	This is in progress, initial actions have been substantially met however recent capacity issues have delayed finalising the update report with the internal auditor, this will be picked up post summer
65							Prepare and regularly review guidance; policies and procedures	
65							Provide data protection and legal support as required to the organisation	
65							Ensure that the Legal and Governance service complies with corporate policies and guidelines on data protection and ICT security	This will be done once the HR system has been procured with regular compulsory refresher training
65							Review and set corporate training requirements in line with audit recommendations	
65							Properly respond to data subject access requests	
65							Ensure through advising and monitoring on an annual basis that departments are properly and regularly cleansing data within them to assist with compliance with data retention schedules	This will be picked up in regular reviews of the retention and data protection audits conducted this year
66				3	2	6		
66	Service: Communities & Citizen Services - Sponsorship - Failure to achieve sponsorship income targets because of the business climate	Difficult to sustain city events and cultural activity on an annual basis.	Paula Redway				£1.5K advertising secured for May Morning 2025. Development Board seeking sponsorship for MOX.	25%
66							All members of the team engage in sponsorship - £4K has been raised recently for the Festive lighting in Gloucester Green over a 3 year period.	100%
66							Target met for this year	100%
66							Following up on leads from recent campaign	
67	Service: Financial Services - Procurement - If there is a failure to follow best procurement practice, then there is an increased risk of challenge. The reputation of the Council will suffer, and there may be financial loss because of challenges and re-running procurements, as well as delays in delivering priorities.	Reputation of Council. Financial penalty. Poor decision making and financial loss due to potentially awarding a contract to the wrong supplier. Potential delays in achieving organisational objectives as a result of challenge and if decision set aside	Annette Osborne	3	4	12		
67							Clear and unambiguous best practice guidance and templates readily available, providing an advisory service for procurements at all values	100%
67							Development and monitoring of a forward plan to identify potential high risk areas (early intervention)	100%
67							Evaluation panels include a cross selection of officers and professional staff, proportionate to the value and risk of the contract being tendered	100%
67							Providing up to date and relevant training to commissioners	100%
67							Regular monitoring of spend and contracts that need to be re tendered and are not allowed to be rolled on	100%
67							Procurement lead on all above threshold procurements	100%
67							The business partner team is fully staffed following recruitment	Recruitments made in June 2025

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
67							Develop succession planning to prepare for gaps created if employee turnover increases and recruitment proves even more challenging because of the uncertainty from LGR. Support employees in preparing for future change and potential selection processes.	Work on succession planning being planned and support for employees to follow in 2026.
68	Service: People - Corporate Management - Managers not equipped to meet the changing needs of the organisation. Development of Fit for the Future Programme, gives new accountabilities and responsibilities for Leaders	If not addressed service improvements and efficiencies not delivered	Gail Malkin	2	2	4		
68							HR Support & Business Partners review processes to support organisation and deliver revised service supported by SLA	100%
68							Leadership development programme	100%
68							Review key policies and deliver relevant training	100%
69	Service: People - People team - Resources insufficient to meet the growing demands of the service. The work demands over which we have no control, such as new starters, pension queries, employee turnover and increasing numbers of payroll transactions, is putting additional pressure on the operations work of the team. Additional temporary resource is coming to an end without efficiency savings having been met, partly due to the ASM platform not leading to time savings.	Service quality is dropping and team is reporting workload pressures and work-related stress. Will need to cut back on service offered and extend service standard delivery times.	Gail Malkin	3	3	9		
69							We have improved resource levels in the operations team and have moved some workflows to iTrent and away from ASM.	10%
70	Service: People - People team - Loss of key talent. Reliance on individual contributors with no cover as team is small. Example - one recruitment consultant - if she left - we would have a limited and reduced recruitment service until replaced	difficulty filling hard-to-recruit roles and longer time to recruit times more generally	Gail Malkin	3	3	9		
70							Maintain People Team as a "great place to work" where individuals are respected, trusted, have meaningful work and are well supported.	90%
71	Service: People - People team - Data protection legal compliance. Historical poor administration practices and pressures of work have meant that data has not been managed in line with data retention schedules.	non-compliance with data protection law	Gail Malkin	3	2	6		
71							Plan in place to tackle data cleansing of records including electronic and paper.	50%
71							Plan in place to tackle data cleansing of records including electronic and paper. Electronic complete. Still working on paper records held in basement and M Drive records. Progress is slow because of the volume and having to fit this in around other commitments.	70%
72	Service: Communities & Citizen Services - Budget pressures - Budget pressures in Customer Services, including Customer Contact and Corporate Support teams. Increased workload Improvements not delivered to improve services and reduce resource requirement Insufficient funding for workforce	Service savings not achieved	Helen Bishop	2	2	4		
72							Tight establishment control in conjunction with Finance	80%
72							Corporate governance of CEX programme to include regular monitoring and escalation where appropriate	
74	Service: Economy, Regeneration and Sustainability - Staff Recruitment - Difficulty in recruiting on proposed terms and conditions - often FTC roles in the service. Terms and conditions of employment are not sufficiently attractive to attract and retain staff	Required skills and capacity are not available to deliver required work programmes or staff turnover results in the loss of skills from the team.	Clive Tritton	2	2	4		
74							Identifying project resource needs in early stages to identify resource needs and commence recruitment early before projects or strategies are committed or pausing projects while resource is secured.	90%
75	Service: Economy, Regeneration and Sustainability - Managing staff capacity - Little capacity in team to allow cover for other team members if required. Internal and external projects and programme are running to very similar timescales across economic development, City Centre, Green Transport, Housing Delivery and Regeneration.	Staff resource and work needs to be carefully prioritised to handle demand. Some programmes are outside our control particularly in Green Transport and Economic Development. Difficulty to provide project cover if regeneration manager or housing supply officer is off work or leaves at short notice.	Clive Tritton	3	3	9		
75							Teams to implement team work plans or programme of projects and make sure it is updated and discussed at team meetings so service managers can monitor pressure points	80%
75							Ensure all staff are using using OneDrive or sharepoint for file storage and the file structure agreed for the team	100%
75							Maintain links with wider services on staffing demand issues, utilise external funds, and recruitment agencies where needed	80%

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
75							Business continuity plans to be reviewed. Ensure all project managers are keeping a risk and issues log up to date and this is reported to development board. Move to sharepoint being used to ensure consistency of filing of key documents should a project need to be handed over.	80%
76	Service: Economy, Regeneration and Sustainability - Good governance - Development board and associated groups within the governance process are not utilised effectively as it could be across the council. Lack of knowledge of how and when to utilise development review group and development board.	Board is reactive or not utilised leading to project problems.	Clive Tritton	3	2	6		
76							Project management training for project managers has been delivered and run by the PMO. Use of Boards is now established for DRG and ARG. Housing Review Group is now being incorporated into the system.	90%
76							Guidance on intranet/Sharepoint regarding development review group, Asset review group and development board. New Intranet site will include a new page for the Project Management Office (PMO).	90%
76							Advertise the development board review group to all project managers across the organisation	90%
76							Ensure consistent and appropriate personnel in PMO to enable the development process to be embedded across the organisation	80%
77	Service: Economy, Regeneration and Sustainability - Health & Safety - Poor health and safety compliance due to inconsistent levels of experience and training. Inconsistent levels of experience and training in project managers. Lack of corporate resource and training in H&S protocols.	Health and safety incidents and non compliance during projects which may cause significant project delays, fines or legal action and more widely causes risk to staff.	Clive Tritton	3	3	9		
77							Health and Safety Team & CDM team have developed training standard for project managers and implemented and then are maintaining records.	100%
77							Update and implement risk assessments for service teams	50%
78	Service: Economy, Regeneration and Sustainability - Support Team Capacity - Lack of specialist advice or delays to projects caused by support team capacity. Commitments to projects and resourcing of support services (procurement, legal, finance, communities, planning) have not been considered in tandem and therefore resourcing in support areas cannot meet requirements of capital projects	Project delays and potentially inaccurate information reported through governance process through lack of specialist advice	Clive Tritton	3	3	9		
78							Raise awareness early with the support services on requirements during projects but also needing to build additional time into projects to reflect delays that occur	70%
78							Ensure support services are liaised with at stage one in the project and that support requirements are discussed and agreed	80%
79	Service: Economy, Regeneration and Sustainability - Staff Budget - Lack of budget to maintain staffing levels across service. Regen team due to failure to capitalise on the regeneration managers time and lack of funding to maintain current levels for city centre management and economic development teams. The staff budget relies on capitalising time and external funding sources	Not being able to maintain staffing level of teams which would mean reduced resource to bring forward projects and programmes and loss of good staff that have often been difficult to recruit	Clive Tritton	2	2	4		
79							Short fixed term contracts result in a risk of losing staff. Where appropriate contracts are being extended as far in advance as possible to avoid losing staff due to uncertainty.	70%
79							Proactively review funding opportunities to sustain staff levels	80%
79							If funding lost look at whether other teams in service or wider require the skills of affected staff whilst funding is secured.	80%
79							Ensure that Project Managers time is built into the Capital budgets on future projects	95%
80	Service: Economy, Regeneration and Sustainability - Housing supply funding - Reduction in funding available impacting housing delivery targets. This is caused by limits to HRA borrowing capacity/ change to HRA business plan, borrowing cost rises making schemes unviable. Lack of Homes England funding rounds. Poor outcome from RSH inspection rates (RP) landlord service any of the compliance criteria/ Annual HE Investment Partner compliance return not considered satisfactory, loss of awarded funding due to not meeting grant terms	Reduced delivery results in increasing further the backlog of housing need if we do not secure additional affordable housing stock and risk of grant including RRTBRs being returned with punitive interest	Dave Scholes	3	3	9		
80							Ensure appropriate resource from across the council is supporting the housing delivery programme (see support services risk)	80%
80							Prioritise funding across the programme to manage risk based on funding sources	80%
80							Work closely with finance on the programme budgets to minimise risk of loss of funding	80%
80							Work closely with Housing on HRA Business Plan review and other factors that may affect ability to secure funding	80%

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
80							Maintain regular liaison and relationships with key contacts at Homes England.	80%
80							Maintain regular liaison with RPs to ensure enabling opportunities are maximised.	80%
80							HRG and OX Place Clienting meetings to ensure programme risks affecting funding closely monitored and managed.	80%
81	Service: Economy, Regeneration and Sustainability - Housing project delays - Programme slippage puts housing delivery targets at risk. Causes could be wide ranging for example risks relating to meeting planning policies, SSSEN grid capacity to 2028/ 2032; and also water and sewage capacity concerns, site specific issues	Either projects are lost from programme or are delayed which adds further cost risk or funding is lost as grant terms not met risk of needing to return Right to Buy receipts if not spent with punitive interest	Dave Scholes	3	3	9		
81							Improve processes with OXPLace to streamline and give more certainty - Collaboration Agreement	80%
81							Each project to follow established governance process including those relating to managing risks and issues with escalation to the responsible sponsor of the project or programme.	80%
81							Ensure the programme of work of each project is fully scoped and thorough feasibility is conducted	80%
81							Good project management with all risks managed and mitigated suitably. Ensure good reporting is conducted by project managers, escalating issues to development board	80%
81							Ensure the programme of work of each project is fully scoped and thorough feasibility is conducted with appropriately qualified professional teams	80%
81							Good project management with all risks managed and mitigated suitably. Ensure good reporting is conducted by project managers, escalating issues to development board	80%
81							Ensure financial checks on contractors as part of procurement	80%
81							Ensure that client requirements re. consultation with council and external stakeholders is happening on projects including with relevant members	80%
81							Internal meetings e.g.OXPlace Programme meetings, OXPlace Client Meetings, Development Board and its review groups to discuss strategic programme issues and identify actions to unblock engaging with relevant stakeholders where necessary.	80%
82	Service: Economy, Regeneration and Sustainability - Lack of key partner engagement - Lack of engagement from partners to deliver Council priorities in Economic Development and City Centre. Third party decision making or capacity issues result in lack of support financially or in kind for key initiatives/projects	Unable to deliver on strategy actions or priorities or fund associated projects/staff or creates unplanned financial pressure	Rupert Waters	3	3	9		
82							Ensure formal established partnership forums e.g. Economic Growth Steering Board and City Centre Delivery Board with key stakeholders established and regular horizon scanning	80%
82							Regular more informal engagement with key local and national bodies to maintain relationships and horizon scan	80%
83	Service: Economy, Regeneration and Sustainability - Resource pressure from partners or stakeholdersKey Stakeholders or partners' projects and priorities create council resource implicationsThird party decision making result in pressure for officer or member support financially or in kind for their initiatives/projects	Unable to resource either the partner priority or our own priorities or creates unplanned financial pressure	Rupert Waters	3	3	9		
83							Ensure formal established partnership forums e.g. Economic Growth Steering Board and City Centre Delivery Board with key stakeholders established and regular horizon scanning	80%
83							Regular more informal engagement with key local and national bodies to maintain relationships and horizon scan	80%
84	Service: Property Assets - Investment into stock and existing properties - Under investment or lack of funding to invest into properties to maintain condition. Caused by budgets not sufficient to match property needs	Properties become poor condition to let, reduction in income and potential non-compliant or dangerous.	Malcolm PEEK	3	3	9		
84							Robust input into the Council's budget process	
84							Understanding of stock condition , developing robust programmes of work to secure budgets are adequate	
85	Service: Communities & Citizen Services - Customer Services - Applications Team KPIs may be unable to be met due to taxi licensing not resourced appropriately. Taxi licensing is not resourced appropriately by the service due to them not agreeing funding	Performance affected and KPIs unable to be achieved	Mark Chandler	2	2	4		
85							Currently temp in place funded by taxi licensing up until end of September, discussions ongoing with Finance and Richard Adams to source this resource permanently	Meeting on 8/10 scheduled to review and agree longer term budget for this post Funding has been agreed by Nigel and Richard Adams to extend this post up until the end of March25, Funding will need to be reviewed and agreed post March25
86	Service: Communities and Citizen Services - Customer Services - Customer behaviour in the Westgate library or larders putting our staff at risk either through physical or mental abuse. Unacceptable behaviour either verbally or physically from customers who visit the Westgate library	Staff are physically or verbally abused	Mark Chandler	2	3	6		Discussions to take place in February about funding for taxi licensing post 31/3/25
86							Mobile phones in place to call library security for assistance as and when required, security guard on site throughout opening times, procedure in place to report and ban customers from the library who are physically or verbally abusive towards our staff, looking to develop training for staff on handling these difficult situations	

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
00087	Service: Communities & Citizen Services - Customer Services - Wellbeing of staff working from home and being able to access support as and when required. Majority of staff working from home regularly without face to face contact	Staff feeling isolated, struggling mentally and not getting the support they need	Mark Chandler	2	2	4		
00087							Duty Manager available for staff to phone at all times to gain access to support, Teams channels set up to communicate with colleagues, monthly 1-1s held with Managers, bi-monthly face to face team meetings take place	
88	Service: Communities and Citizen Services - Customer Services - Staff not following data protection processes resulting in breaches. Staff not following data protection guidelines or having the appropriate up to date training and awareness of procedures	Data protection breaches resulting in unhappy customers	Mark Chandler	2	2	4		
88							All staff ensuring data protection training is completed as per mandatory requirements, breaches reported to Managers and plans put in place to take actions to prevent further re-occurrences including re-taking training where necessary	
89	Service: ICT - Retaining skilled ICT professionals is difficult because of uncompetitive salaries in some areas.	Staff leave.	Rocco Labellarte	1	3	3		
89							Provide flexibility - output based working versus presenteeism. Review grades and salaries for key roles.	
89							Staff recognition initiatives implemented in April 2025 were intended to consolidate low probability.	
90	Service: ICT - Addressing ICT staff skills gaps. Single points of failure, in particular with the absence of business owners and super-users within the services.	Delays in resolving issues for individuals and services.	Rocco Labellarte	3	3	9		
90							Considerable work has gone into work on systems and processes across the Council. Including work on super users, user support groups and additional training. Waiting times for support have come down significantly year-on-year.	Further work remains to do and the cyber incident has increased demand.
91	Service: ICT - Resources insufficient to meet demands of service. Caused by competing priorities (BAU, Projects, non-ICT issues passed to ICT).	Demand exceeds capacity, and staff work long hours, struggling mentally (as evidenced by the H&S Survey)	Rocco Labellarte	3	3	9		
91							Appropriate management action ensuring leave, toil, employee assistant are appropriately utilised.	Leave has been taken over August and a thank you session held by the Chief Executive following the cyber incident. Vacant management post has been filled and process improvements implemented helping to manage workflow. High workloads remain, but new projects come with associated resources which need to be appropriately managed. The cyber incident has mean additional work, dedicated resource is being worked through based on the need identified in the subsequent reports.
93	Service: Economy, Regeneration and Sustainability - Capital Project Delays - Significant delays of capital projects. Caused by unforeseen consequences e.g. planning risks, external factors, competing asks on resources, contractor insolvency or supply chain issues	Reduced performance and missed targets on capital projects which affect overall expenditure, MTFP spend or grant stipulations	Clive Tritton	3	3	9		
93							Ensure the programme of work of each project is fully scoped and thorough feasibility is conducted with appropriately qualified professional teams	80%
93							Good project management with all risks managed and mitigated suitably. Ensure good reporting is conducted by project managers, escalating issues to development board.	80%
93							Undertake financial checks on contractors as part of procurement.	80%
93							Internal meetings e.g. project boards and Development Board including its review groups to discuss strategic programme issues and identify actions to unblock engaging with relevant stakeholders where necessary.	80%
93							Undertake consultation internal and external on projects including with members	80%
94	Service: Financial Services - Property Insurance - If the Council is unable to provide adequate information about the construction of existing buildings in its ownership and their valuations, its Insurers may continue to provide insurance that does not meet the full needs of the Council and exposes it to uninsured risks and financial loss. The Council has been unable to provide sufficient information to Insurers about the construction of properties and the cost of their reinstatement.	Only one Insurer quoted at the last tender and the insurance cover provided has significant weaknesses. The property valuations that the Council has may be wrong, resulting in properties being under or over insured. The Council's properties are insured on a declared value basis, they might be underinsured because of inflation. Unoccupied properties are uninsured. The Council is unable to go to tender before it improves the information that it has.	Nigel Kennedy	2	4	8		
94							The Council has secured a commitment from its Insurer that they will offer renewal terms for the 12 month period from 1 July 2025	
94							The Council has appointed a consultant that specialises in rebuild cost assessment. These will be undertaken over a three year rolling programme.	The consultant has been appointed
94							51% of HRA housing stock has been surveyed.	The progress with gathering the survey information continues

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
94							Housing losses, other than in tower blocks, are limited to £5,000,000	This remains the same.
94							Clarification on the exact requirements that Insurers have is being obtained.	Clarification of the Insurers requirements has been established.
95	Service: Property Assets - Capital Receipts - Inability to reach capital receipts budget because of market forces, being dependant on engagement of 3rd parties. Selling from investment portfolio reduction in income	Reduced capital causes increased borrowing or reduction in capital programme	Emma Gubbins	2	3	6		
95							Constant review of lease re-gear opportunities and special purchasers	On going target - ahead for Q2
96	Service: Property Assets - Lack of legal capacity - If there is a lack of legal support, the Council will be unable to meet income, capital receipt, and project targets. Alternatively, external legal spend will be more costly and will result in an increase in financial pressure. This is caused by insufficient base budget in Law & Governance results in insufficient capacity.	Reduced income, reduced capital receipt, risk of legal challenge, reputational damage, increased complaints.	Emma Gubbins	4	4	16		
96							Increased base budget (finance/legal). Ongoing review of legal requirements. Short term more external support.	
96							Legal team to have early understanding of workloads	
103	Service: Planning & Regulation - Regulatory compliance - Failure to comply with regulations and statutory compliance. This is caused by insufficient resources impacting on ability to ensure compliance, a culture that fails to enforce policies; a lack of knowledge exacerbated by staff turnover; changes in legislation; increased demand leading to mistakes by staff.	A loss of public trust and confidence in the Council's ability to govern effectively. Negative media attention will harm the Council's reputation. Elected Members and senior officers face criticism. The Council's ability to deliver services is undermined as important decisions are made incorrectly. Disputes among Members and staff. Fines and penalties and loss of grants and funding.	David Butler, Richard Adams	2	4	8		
103							Clarity about roles and responsibilities	Building Control job descriptions are in place. Being taken to HR for approval. All other teams job descriptions are appropriate and in place
103							Correct corporate processes in place to ensure that policy is translated to process	Work procedures and policies are in place.
103							Internal and external audit conduct audits and reviews of Council processes	LABC internal audit being submitted
103							Appropriate level of physical, technological (including new base system), and human resources	There is reliance on contractors. Building Control job descriptions are going through Job Evaluation. Current Building Contral role is part of market allowance scheme.
103							Ongoing training for staff on regulatory frameworks	Regular staff training with training plans
103							Ensure culture allows whistleblowing/challenge	The Council has a whistle blowing policy.
103							Ability to disseminate lessons learnt	Sharepoint sites are used as tools to spread information. Staff meetings. Tools are in place.
103							Ensure that systems are in place to monitor and control compliance and updates	Document control is in place for policy and procedures with review dates.
108	Service: Housing - Failure of Homeless Prevention Activities - Temporary Accommodation - Failure to effectively manage the financial burden and demand for temporary accommodation in accordance with the individual needs of clients. This is caused by service delivery failure - homeless prevention activities become unable to meet a sustained increase in homelessness in Oxford leading to increased homeless placements/TA costs.	Reputational Impact - Increase in reviews - client's taking legal action/ appealing against their housing decisions, clients approaching media to highlight their case and shame council. Financial Impact - Increase in temporary accommodation costs adding pressure to general fund. Legal Impact - Council's inability to fulfil its duty to provide or secure the provision of advice and information about homelessness and the prevention of homelessness. Overall Impact - If this risk was realised, this would hinder the operation of this service as the financial viability of this service would be called into question and related issues impacting to regulatory compliance would impact on OCC.	Nerys Parry	2	4	8		
108							Enhancing the prevention offer - including sourcing and negotiating the right type of accommodation required that meets the varying client groups	The team continue to focus on Homeless prevention activities and to minimise homeless placements in Temporary Accommodation. .
108							Maintaining efforts and focus on early intervention and homelessness prevention	
108							Regular budget monitoring to scrutinise budget expenditure and taking opportunities to bid for external funding where available	

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
109	Service: Housing - Failure to meet Homeless Temporary Accommodation Demand - Inability to keep up with increasing demand as a result of government changes in eligibility assistance criteria, including those who are eligible as a result of their immigration status, resettlement, changes in priority. This also includes the wider contextual imbalances, within council's own stock and private housing. This might be caused by service delivery failure - homeless prevention activities become unable to meet a sustained increase in homelessness in Oxford leading to increased homeless placements / temporary accommodation costs due to changes in Government legislation/policy.	Reputational Impact - Inappropriate use of social media by clients to amplify their issues - these could also result in loss of trust and support from key stakeholders and wider local government community. Financial Impact - Inability to secure sufficient homelessness grant funding that meets the increasing demand. Legal Impact - The council is not obliged to house everyone who is experiencing or at risk of homelessness. However, it is required to take action depending on the circumstances of each case. It must comply with relevant legislation and have regard to the statutory code of guidance. Overall Impact - Limited impact when variables such as current Government welfare and immigration policy is considered but this is subject to review if there were Government policy changes.	Richard Wood	2	3	6		
109							Offer of early intervention and prevention that seeks to address the holistic needs of people at risk of losing their home	Homeless prevention work continues to be a prioritised.
109							Establishment of clear pathways for service users to access so they can get the assistance they need	
109							Offer of on-going housing support to more vulnerable clients focused on clear outcome based plans that foster independence	
109							Annual Lettings Plan Targets for the Homelessness/Review of the Allocations Scheme	The Annual Lettings Plan for 25/26 has been approved, which increases the percentage of lettings to homeless list, to help increase move on from Temporary Accommodation. A review of the Allocations Scheme is underway.
109							Planned temporary accommodation mitigations to increase supply including decants of blocks to be re-developed and more PSL units	Work on temporary accommodation mitigations is continuing to progress.
110	Service: Housing - Delayed new build developments/acquisitions - A failure to secure pipeline of affordable supply arising from council's housing development programme, sourcing of PRS acquisitions and maximising on supply opportunities including downsizing, securing nomination rights, empty properties and fast void turnarounds. This might be caused by service delivery failure - new build completions of social housing are delayed due to developers failing to complete on time. Planned acquisitions slow down to a lack of supply of suitable properties in Oxford. Changes to the PRS Housing Markets including the Renters Rights Bill reduces the supply of affordable PRS available. Improvements to the Void process fail to reduce Void Re-let Times.	Reputational Impact - Inability to deliver on council housing programme targets will impact on housing waiting list, but will also impact negatively, loss of trust from key stakeholders and funding partners. Financial Impact - Delays or non-delivery of council housing programme will severely impact and add further financial pressures on HRA Business Plan as well as add further pressures on General Fund as families will need to remain in Temporary Accommodation. Legal Impact - It is a legal requirement to ensure that TA is suitable and families with children do not spend over 6 weeks in B&B, households believing they have been offered unsuitable accommodation make take legal action against council. Overall Impact - TA provision appears on target but this is subject to review in the light of regular and updated data	Dave Scholes, Nerys Parry	2	4	8		
110							Progress against the housing development programmer and targets are regularly monitored and tracked. See also the related risk "Housing Supply Funding" which is also monitored under Economy, Regeneration and Sustainability area.	
110							Building stronger relationships with private sector landlords, keeping under review the offer to PRS landlords to maximise supply.	
110							Maximising funding and supply opportunities - including the LAHF programmes and working with Homes England to bring in more funding for Brownfield sites.	
111	Service: Housing - Implementation of the Landlord Services Re-Organisation - risk of not delivering the re-organisation of landlord service in a timely manner and as a consequence it does not deliver the changes required including service improvements, culture change and achieve better outcomes for tenants. This might be caused by service delivery failure - the landlord services re-organisation is not completed within the expected timelines due to delays in new staffing structures and processes being put in place.	Reputational Impact - inability to establish a service structure that is more fit for purpose, responsive to new regulatory requirements and changing needs of tenants and homes. Financial Impact - Inability to realise reorganization benefits such as improving efficiency and effectiveness of service delivery and achieving better outcomes for the HRA. Legal Impact - New SHR regulatory requirements means the council as a landlord has a duty to comply and meet required standards, failing to do so it will breach and face sanctions imposed by the SHR Overall Impact - Limited impact as the initial work for the re-organisation has begun and good progress has been made.	Nerys Parry	2	4	8		
111							Re-organisation of Landlord services is complete. Transitional arrangements in place pending recruitment. Significant training and development plan as part of transformation to deliver compliant service that meet tenant needs.	Update 01/10/25 - Formal consultation process closed. Transition period in place from 01/09/25 with many new roles being recruited to and staff moving into new roles/JD requirements. Decision of go-live on area based working to be taken when recruitment is more advanced and more new staff are in post. Significant training and development plan developed to support the on-going transformation of the service to ensure compliance.

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
112	Service: Housing - Failure in resident involvement activities/compliance with the Social Housing Act /Consumer Standards - Tenant voice - failure to improve tenant involvement activities/implement the reset programme to help deliver tenant led recommendations and priorities and organisation objectives to comply with the Transparency, influence and accountability standard. Service Failure - Tenant Involvement governance arrangements and activities are not fit for purpose and do not allow the tenants voice to be heard/meaningful involvement in line with responsibilities under the SHA/Consumer Standards.	Reputational Impact - A poor service offer/lack of tenant involvement risks an increase in complaints as it fails to provide tenants with the platform and opportunity to help shape and add value to service improvements (and could also result in Regulator/Ombudsman intervention). Financial Impact – failure to establish efficient routes/platforms for tenants to raise their voice/concerns can be costly and also fails to capture financial efficiencies. Inefficient service delivery can be costly and lead to adding financial pressure on HRA. Legal Impact - New SHR regulatory requirements means the council as a landlord has a duty to comply and meet required standards, failing to do so it will breach and face sanctions imposed by the SHR. Overall Impact - There are currently no systemic arrangements to consult with tenants so this is a tangible risk in terms of SHR deciding infringements have taken place. However, to mitigate this risk, evidence can be presented to the SHR that work has begun to address this core issue. In respect of service delivery, involvement with tenants on a systematic basis, as envisaged in the Cabinet report of December 2024 on Tenant Management, would help drive up customer satisfaction levels.	Nerys Parry	5	4	20		
112							Re-organisation of landlord services complete. Specific reset work underway to develop a new approach to resident involvement that will lead to a new strategy and structure for involvement.	1/10 Building on steps to embed the new landlord services structure with training and development, as well as strategy and structure now in draft and due to go to Cabinet in Dec, to improve service delivery to residents.
112							To ensure that data gathered is being used to reflect tenants' changing needs and therefore the service offer.	1/10 Building on the current work to "know our tenant, know their needs" to improve data and information, and ensure info used to better align services.
113	Service: Housing - Inspection by the Regulator of Social Housing and Inspection readiness - failure to evidence the implementation/ adherence to Social Housing Regulator's consumer standards across housing - and this resulting in a [C3] grading following inspection. Service Failure - OCC current/planned activities fail an inspection by the Regulator of Social Housing that as a social landlord OCC is complying with the Social Housing Act / regulator consumer standards.	Reputational Impact - A low grade will impact negatively on council's overall reputation and loss of trust from tenants who will perceive they are not getting the services they need and value for money for their rent Financial Impact - A C3 grading will indicate serious failings that may affect housing services quality, such as delayed repairs or inadequate safety measures - a reactive approach to addressing these issues will add financial pressure on HRA Legal Impact - A low grade judgement from SHR will impact negatively on council's reputation - reflecting that it does not meet SHR governance requirements. These would be issues of serious regulatory concern where urgent action will be required to improve its position. Overall Impact - This is a tangible risk as while there is a body of work to ensure compliance requirements are met, the full programme of work is yet to be implemented.	Nerys Parry	4	4	16		
113							A series of action plans are in place to ensuring the preparations and application of consumer standards - including improvements in Tenant Satisfaction Measures	Housing Board continues to track a number of workstreams focused on delivery of strategies and alignment with the consumer standards. Further work is underway to assess progress.
114	Service: Housing - Leaseholder Services fail to comply with the Social Housing Act / Consumer Standards - Leasehold - failure to deliver a fair, transparent and compliant leasehold service to leaseholders that meets their needs and is reflective and demonstrates value for money of their management fee. Service failure - improvements to leaseholder compliance activities are delayed and OCC is unable to comply with the SHA/Consumer Standards for leaseholders	Reputational Impact - A failure to provide a fair and compliant service to leaseholders will negatively impact on council's reputation and perception that it is not delivering compliant services to leaseholders Financial Impact - A poor leasehold service offer, reduces council's ability to collect service charges and recover works expenditure and secure funding back to the HRA Legal Impact - Leaseholders have the right to get information about service charges, and be consulted maintenance and running costs. The inability for council to comply with these function can lead to leaseholders challenging these through the First-tier Tribunal (Property Chamber) Overall Impact - This is a tangible risk as while there is a body of work to ensure compliance requirements are met, the full programme of work is yet to be implemented	Nerys Parry	3	3	9		
114							A review of leasehold service offer is being drawn up to help understand the gaps and issues of the service	Work is now underway between the service and legal to ensure compliance
115	Service: Housing - Implementation of the Development plans for HRA Asset Management - There is a risk of not changing policies, processes and procedures for HRA property service functions in a timely manner and as a consequence it does not deliver the changes desired including a fit for purpose client team to effectively commission and oversee delivery of works and services, establish the service improvements required including around repairs, safety and compliance. The cause might be that the HRA Asset Management re-organisation is not completed within the expected timelines due to delays in new staffing structures and processes being put in place.	Reputational Impact - inability to establish an HRA service structure that is more fit for purpose, responsive to new regulatory requirements and changing needs of tenants and homes. Financial Impact - Inability to realise reorganisation benefits such as improving efficiency and effectiveness of service delivery and achieving better outcomes for the HRA Legal Impact - Inability to establish a service structure that is responsive to meeting new regulatory regime - social housing regulator consumer standards Overall Impact - This risk would, if realised, have a significant impact on the operation and viability of HRA services	Nerys Parry	3	4	12		
115							Review service offer to ensure there is sufficient capacity and capability to commission and client all HRA asset work	Consultancy work delivered and being considered. Interim capacity in place to support current delivery.

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
116	Service: Housing - HRA Investment and Management Controls fail to comply with the Social Housing Act/Consumer Standards. 5 year investment programme - There is a need for the council as a landlord to set out the strategic direction for OCC's HRA capital management and investment plans, which must also form part of the medium to long term financial and service planning and budget setting process. It also risks complying with Social Housing Regulator expectations in relation to the council having the investment management and controls in place.The Council's current/planned investment activities fail to comply with the Social Housing Act /Regulator consumer standards.	Reputational Impact - Failure to plan and develop short/medium/long term investment will prove difficult to evidence compliance and satisfy Social Housing Regulator regulatory requirements relating to effectively planning maintenance and delivering good outcomes and value for money to the HRA. Financial Impact - Risk of not being able to adopt investment planning risks the council in continuing to commission works in a reactive manner which can be costly and add further financial pressure to the HRA. It also risks in the Social Housing Regulator highlighting this as failure for delivering good outcomes to tenants and effective management and governance of HRA. Legal Impact - Risk of council as a landlord not meeting SHR Consumer standards - in particular Safety and Quality Homes standard where efficient knowledge, planning of assets and maintenance must be evidenced. Overall Impact - Would be a significant if this risk was realised in meeting social housing targets in terms of overall delivery of the programme.	Nerys Parry	3	3	9		
116							Whilst a 5 year capital programme is established there are on-going risks on data accuracy - including outstanding data from stock condition surveys due to commence. Transitional arrangements are taking place with the supply chain.	Transitional first year underway, work progressing well for the development of the next year of the 5 year rolling programme. Interim support in place to ensure work stays on track and is robust and delivered on time to the supply chain.
116							Consultancy and interim support has been applied to assist on this to ensure the council's first 5Y programme is developed and agreed	
117	Service: Housing - HRA Asset Management Safety and Compliance - The council risks inability to comply with legislation and on-going changes relating to safety which form part of the new regulatory regime that bring increased scrutiny of council's approach to meeting all applicable fire, health and safety obligations to ensure the safety of all tenants. This would be caused by the council's safety and compliance activities failing to comply with the Social Housing Act customer standards.	Reputational Impact - Failure to evidence and satisfy the Social Housing Regulator that OCC is complying with its Safety requirements will bring the council into disrepute, result in a loss of confidence and concerns from tenants about their safety Financial Impact - Failure to meet safety and compliance requirements will question council's role as a landlord and its ability to effectively govern and have efficient management of its HRA and maintenance plans - as well as its requirements to meet decent home standards Legal Impact - Bringing the council into disrepute and lack confidence in council's ability to meet its landlord legislative obligations and intervention from the Social Housing Regulator. Overall Impact - This is a tangible risk as while there is a body of work to ensure compliance requirements are met, the full programme of work is yet to be implemented. There are yet to be fully approved technical policies, such as in damp and mould or asbestos, to take just two examples, which ensure there is standard compliance practices to meet safety standards. A mitigating factor is the institutional memory within OCC on such matters but if there was a staff turnover, this risk may be accentuated accordingly.	Nerys Parry	3	4	12		
117							Development of an audit programme to ensure data accuracy	Resource in place to commence the audit imminently.
118	Service: Housing - Repairs Maintenance - The council risks being unable as a landlord to comply with Social Housing Regulator consumer standard (Safety and Quality) to provide an effective, efficient and timely repairs, maintenance and planned improvements service for the homes and communal areas for which the council is responsible. A failure would be caused by the council's current/planned activities on property maintenance and repairs taking longer than expected and the council fails an inspection by the Regulator of Social Housing that as a social landlord OCC is complying with the Social Housing Act / regulator consumer standards.	Reputational Impact - OCC's inability to effectively manage repairs can lead to increase in complaints and escalating costs, loss of rent and spend on HRA. This in turn will bring Ombudsman / Social Housing Regulator involvement and bring the council into disrepute. Financial Impact - OCC's inability to demonstrate effective governance and management of its HRA finances. Inability to manage repairs expenditure. Legal Impact - bringing the council into disrepute and lack confidence in council's ability to meet its landlord legislative obligations and intervention from the Social Housing Regulator . Overall Impact - while this risk, if realised, would be significant - steps have been made to mitigate this risk. The decision of the Cabinet to approve the HRA Business Plan, Asset Management and 5-Year Investment Programme and the Tenancy Management and Involvement programme has led to governance structures being introduced and a work programme being developed to include the issue of repairs	Nerys Parry	2	4	8		
118							External consultants commissioned to review the end to end repairs process to ensure efficiency and effectiveness.	Work is pending delivery (1/10) and will contain an action plan to implement to cover efficiency, effectiveness and tenant communication.

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
119	Service: Housing - Voids - There is a risk that the council as a landlord will not comply with the Social Housing Regulator consumer standard (Safety and Quality) and provide an effective, efficient and timely voids service procedure for the homes which the council is responsible for.This would be caused by void works taking longer than expected and the council fails an inspection by the Regulator of Social Housing that as a social landlord OCC is complying with the Social Housing Act / regulator consumer standards.	Reputational Impact - OCC's inability to effectively manage voids can lead to increase in complaints and escalating costs, loss of rent and spend on HRA. This in turn will bring Ombudsman / Social Housing Regulator involvement and bring council into disrepute. Financial Impact - OCC's inability to demonstrate effective governance and management of its HRA finances. Inability to manage void expenditure and rent loss as a result of long term void turnarounds can impact on income to HRA. Legal Impact - bringing the council into disrepute and lack confidence in council's ability to meet its landlord legislative obligations and intervention from SHR . Overall Impact - while this risk, if realised, would be significant - steps have been made to mitigate this risk. The decision of the Cabinet to approve the HRA Business Plan, Asset Management and 5-Year Investment Programme and the Tenancy Management and Involvement programme has led to governance structures being introduced and a work programme being developed to include the issue of voids	Nerys Parry	2	4	8		
119							External consultant commissioned to review the end to end voids process to provide recommendations to OCC to implement to improve performance in this area as soon as possible	Consultant report due 1/10 with action plan for implementation
120	Service: Housing - Workforce, skills and capacity for service delivery - There are risks and challenges across a range of service areas within the housing service, including recruitment, retention of staff, and skilled workforce. Experienced staff might leave the council or move to new posts. Existing and new staff will require training on existing/new processes, best practice and changes in legislation, including the Social Housing Act, Renters Rights Act and Awaab's Law.	Reputational Impact - Inability to have the right, skilled resources can impact on service delivery as well as affect the well-being of employees. In addition, restructuring may require employees to adapt to new roles, learn new skills, and cope with job loss or job hunting. Financial Impact - Inability to have the right workforce in place can lead to substantial financial burdens added to the HRA and reduce resilience of services. This can heighten the over-reliance on interim workforce which can be disruptive to service due to the instability of service, loss of skills/knowledge . Legal Impact - The council as the local housing authority has the regulatory requirement to provide free housing advice and support - ensuring that services are adequately resourced and skilled Overall Impact - Significant impact to the operation of the HRA and wider social housing programme	Nerys Parry	3	3	9		
120							Landlord services re-organisation seeks to identify the skills and resources required for a more fit for purpose service.	Re-organisation delivered and the training and development plan scoped - to apply to all staff working across landlord services
120							Training, development and upskilling will form part of ensuring staff have the tools and support to carry out roles	
121	Service: Housing - Housing IT and Systems - the ineffectiveness and transition of new and legacy systems can significantly impact the efficiency and effectiveness of service delivery across housing and ultimately tenant customer satisfaction. This would be caused by Housing IT systems failing to support the business needs of the service, affecting service delivery times and customer satisfaction levels	Reputational Impact - Inefficient systems, software, and hardware can slow down daily tasks, leading to a decrease in staff productivity and impact on service delivery overall to tenants Financial Impact - Increased Costs as a result of inefficient systems that do not talk to each other - consequently leading to higher operational costs. Maintaining outdated systems often requires more resources and specialised support, which can be expensive and add financial pressures to HRA Legal Impact - Council as a landlord has the obligation to ensure the integrity and security of systems it has in place Overall Impact - delays in service delivery, increased customer complaints and staff dissatisfaction/lower morale	Nerys Parry	3	3	9		
121							On-going development of the use of the current housing QL system/Versaa forms is continuing to support service delivery. Re-procurement is being considered for parts of the housing system relating to Homeless and Allocations to improve functionality available to staff/customers in this area.	Optimisation of the use of the existing Housing Needs system continues and procurement of a new housing needs system for areas of Homeless and Allocations is underway.
122	Service: Housing - Data and performance - There is a risk that there will be a failure to have effective data and performance management systems in place. These are critical for making informed business decisions, both strategically and operationally. Existing processes and procedures fail to accurately record all data required on tenants (and housing applicants) - including protected characteristics, property/building information - including component data, to ensure activities and priorities for compliance, performance management/service improvement/risk management are all data led.	Reputational Impact - As the local housing authority, the council is required and responsible for ensuring the integrity of data, how it uses these for making decisions and reporting on performance to tenants, Regulator - including government returns. Failure to do this will result in loss of confidence and greater scrutiny from the Social Housing Regulator Financial Impact - Poor data and performance management impacts on the council's ability to deliver its HRA Business Plan priorities and reduce pressures on GF. For e.g.; unplanned cost increases, revenue reduction and poor client management functions - including ODS/contractors. This could also impact on council's ability to demonstrate its value for money duty across both HRA and GF Legal Impact - OCC as a landlord has the obligation to ensure the integrity and security of systems it has in place. It has duty to ensure the integrity of any data returns it submits to govt or social housing regulator Overall Impact - This is a significant risk as while the data function exists, the QL system needs to be fully operational. The need for reliable and up to the minute data is critical for all aspects of the HRA programme and therefore the need for data to be of consistently high quality remains paramount to the good functioning of the HRA service.	Nerys Parry	3	4	12		
122							Significant amount of work is being applied to ensure the integrity and efficient management of asset data is in place	Additional capacity in place to support efficient management and improvement of data. Ongoing stock condition work procured.
122							Improvement in performance management systems and mechanisms across housing are being reviewed to ensure that resources and financial spend are targeted to address service issues	Recruitment of data analyst to support the further development of performance management systems and mechanisms

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
123	Service: Housing - Financial management of the Housing Revenue Account - There is a risk that the council, which has responsibility for the efficient and effective management of the HRA, fails to account and evidence the expenditure and income against the running of its housing stock. The council must provide sufficient evidence to the Social Housing Regulator of effective and efficient financial management of the HRA for OCC tenants and also compliance with expectations as a social landlord.	Reputational Impact - Failure to sufficiently evidence the efficient and transparent use of HRA can negatively impact on council's reputation and intervention from regulator. This can also lead to loss of trust from tenants - and raising concerns / complaints Financial Impact - Failure to evidence and satisfy the SHR regulator inspection criteria "financial resilience" - which covers the extent on how HRA funds generated from tenants rent collection is invested back into the HRA for asset and service improvements and secure good tenant outcomes Legal Impact - The HRA is a ring-fenced account within the General Fund - with income and expenditure being prescribed by statute with no general discretion to breach the ring-fence Overall Impact - This is a significant risk as there is data to suggest cost overruns have occurred that is not in line with budgetary expectations. The risk has been mitigated, to a limited extent, by internal cost control mechanisms.	Nerys Parry	3	4	12		
123							Council has a clear understanding of government's policy that the HRA remains a ring-fenced account within the General Fund; and within this it should still be primarily a landlord account containing the income and expenditure arising from the council's landlord functions.	Work streams including repairs and voids seek to address elements of this work
124	Service: Housing - Inadequate controls to manage HRA financial spend - result in an overspend, programme targets not being met and impacting on the ability to deliver services within the HRA. This might be caused by controls and clienting arrangements being inadequate to meet service needs.	Reputational Impact - failure to ensure effective joint working between OCC and service suppliers would impair the reliability of the maintenance and upkeep of the housing stock. This could lead to tenants expressing dissatisfaction which would damage the reputation of the OCC with tenants. If tenants decided to express concern on social media or to specific media outlets this would damage the reputation of OCC amongst the wider public and with key stakeholder groups as well as damage the relationship between OCC and Social Housing Regulator which could lead to infringement actions taken by the regulator. Financial Impact - is significant as it could lead to unsustainable budget overspends due to, amongst other factors, a lack of a joined up approach towards budgetary and programme works between OCC and ODS. This could undermine the HRA Budget and add financial pressures to the HRA business plan. The efficiency of effective financial controls would be brought into question as a direct consequence of the realisation of this risk profile. Legal Impact - disruptions in the working relationship between OCC and service suppliers that led to issues with maintenance and issues with budgetary controls would mean that this could lead to systemic failure with customer standards and economic governance that could necessitate Social Housing Regulator action against OCC. Tenants could potentially take legal action via a class action in reference to various housing statutes in such an extreme scenario. Overall Impact - disruptions in the working relationship between OCC and service suppliers that led to issues with maintenance and issues with budgetary controls would mean that this could lead to systemic failure with customer standards and economic governance that could necessitate Social Housing Regulator action against OCC. Tenants could potentially take legal action via a class action in reference to various housing statutes in such an extreme scenario.	Nerys Parry	2	4	8		
124							New client management arrangements will tighten and add improvements in the commissioning of works - coupled with performance management measures to ensure commissioned works are delivered to timescales and within budget. These should lead also to improving and building good working relationships with clear lines of responsibility and accountability	Arrangements of client management in place.
125	Service: Communities & Citizen Services - Leisure contract financial performance - There is ongoing contract management and a partnership approach to the external leisure provision contract, to ensure stability with its financial performance. Causes of issues could include external factors such as pandemics, utility pricing or a bid that was unrealistic.	Financial impact to OCC and or service reduction to cut costs that impact service quality.	Hagan Lewisman	4	4	16		
125							Ensure robust contract in place	
125							Explore other options for income generation within the contract, such as agency model, fees and charges, and improved commercial options. Regular client and governance meetings.	
125							Strong, well skilled client team	
125							Work with Serco leisure to ensure options are presented to reduce/remove any pressure to the Council	
125							Quarterly monitoring	
125							Open book accounting	
125							Internal officers meeting	

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
126	Service: Communities & Citizen Services - Financial savings against community centres - Desired savings may not be achieved, because savings were developed without the input of the service area	Financial impact to OCC and or service reduction to cut costs. Service quality would be impacted.	Hagan Lewisman	4	4	16		
126							Community Centres Review Board set up	
126							PID going to Development Board	
126							Plan of action in place for year 1 including business case review, lettings, charges and other areas of revenue	

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Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
12	Service: Economy, Regeneration & Sustainability - Increased costs and complexity for waste - The increased costs and complexity in the delivery of the Council's domestic collection service, and ODS commercial waste operations. This is caused by changes in statutory obligations in the waste and recycling system and in funding mechanisms for domestic waste services. Competition in commercial waste services.	If higher costs are not sufficiently matched with increased revenues to support the delivery of the new obligations, this may impact on the funding of other service areas - as domestic waste collections are a statutory requirement. If the net income ODS derives from commercial waste operations reduces this could also impact on dividend payments to the Council which underpin other service delivery.	Clive Tritton	3	4	12		
14	Service: Chief Executive - Partnership working - The devolution governance debate disrupts partnership work because County and Districts might pursue different options for Unitary Government	Negative impacts on services and projects delivered in partnership with County and partners.	Mish Tullar	3	3	9		
15	Service: Property Assets - Staff recruitment and retention - Inability to recruit and/or retain staff on proposed terms and conditions in Property Services (particularly in respect of HRA and compliance).Terms and conditions of employment are not sufficiently attractive to attract permanent staff. Most other Councils are trying to attract similar staff from a small pool of available candidates	Required skills and capacity are not available to deliver required work programmes.	Malcolm PEEK	2	3	6		
16	Service: Planning and Regulation: ICT Service Failure - Major service failure due to significant loss of ICT or staff etc. The cause might be major systems failure, a major health pandemic etc	Reduction in staff or premises availability means a reduced service to customers and or a backlog of work to be cleared.	David Butler	3	3	9		
17	Service: Planning & Regulation - Regulation of the Private Rented Sector - Opportunity to embed HMO licensing across the City and to regulate the private rented sector. A failure might be caused by systems failure/poor delivery of service; inadequate engagement; non-compliance with regulation/ legislation	Damage to Council reputation and potentially finances; risks to occupiers. neighbours	David Butler	2	2	4		
18	Financial Services: Reputation Management - Failure to deliver an efficient and timely year end process for annual Council Tax and NDR bills, Rents, Garage and leaseholder statements. This can be caused by lack of resources (staff/finance) Upgrades of software not carried out Single points of failure CTR will be administered through Revenues not Benefits Knowledge of requirements Ability to design templates Legislative requirements not addressed	The biggest risk to the Council is reputational. If the bills and notices are not delivered on time the Council cannot collect income due to it and would suffer reputational damage as a consequence. This risk is low until the process starts again in October	Laura Bessell	3	4	12		
20	Service: Planning & Regulation - Unplanned Workload - Unplanned workload leading to reactive response and delay or omission of proactive work. This can be caused by complaints, added complexities to existing work, unplanned work demands corporate or external	Delay or omission of programmed work, impact on quality of work if it is rushed or not checked. Reduction in quality of service to customers	David Butler	3	4	12		
21	Service: Financial Services - ICT - OCC not able to deliver the improvements to ICT systems in a timely and manageable manner. This will result in an inability to deliver ICT Systems that operate in a controlled and robust manner on a timely basis. It can be caused by ICT workplan not adhered to and delayed; System implementation ineffectual leading to delays and / or poor system design and implementation	Increased inefficiencies in work flow leading to increased manual working and worsening collection rates; controls around the system not robust leading to an increased level of reconciliation or data control issues Project plans overlapping so that there is excessive work for staff over a shortened time period Non-compliance with contractual agreements and non-compliance with external standards such as PCN and PCI-DSS	Clare Paterson	3	4	12		
23	Service: Property Assets - Income Generation - Income generation from property portfolio is threatened, due to Covid-19 backlog, which is almost cleared, and market forces and cost of living issues. Portfolio is biased towards retail/food and beverage. Market currently patchy and backlog of lease events. Particularly on estate shop portfolio.	Reduced rent leading to budget pressure	Emma Gubbins	3	3	9		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
24	Service: Planning & Regulation - Project Delays - Project delays (service specific). Poor project management of projects such as LocalPlan, major Development management case, change projects	Reduced performance, missed targets, ultimately delay to delivery of needed housing on the ground.	David Butler	3	3	9		
25	Service: Property Assets - Income reduction due to condition of properties - Inability / delay in letting or increased incentives. Stock returned in poor condition, increased forfeiture. Failure of landlord repairing liabilities	Reduced or delayed rent or capital receipt leading to budget pressure	Malcolm PEEK	3	3	9		
26	Service: Financial Services - Failure to recruit and retain key staff. Insufficient quality of applicants to vacancies, current key staff leave to better opportunities. This might be caused by current pay scales not attractive, reputation of Council will not attract new recruits	Vacant posts remain vacant, and existing posts become vacant. Further pressure is put onto remaining staff to fulfil extra tasks	Nigel Kennedy	3	3	9		
27	Service: Planning & Regulation - External Delays - Delays to Council projects caused by outside agenciesDelays by outside agencies - County Council, Consultees, National and Regional Government and other agencies	Reduced performance, missed targets	David Butler	4	4	16		
28	Service: Property Assets - Property non-compliance - Assets becoming non-compliant resulting in Health & Safety failure. (includes trees, green spaces and the like).This could be caused by a lack of monitoring and management	Risk of hazard to people or property, unable to let properties so reduced income. Risk to the reputation of the council and action against the council and officers. Increased insurance costs.	Malcolm PEEK	2	4	8		
30	Service: Financial Services - Treasury Management - Safety of investments may be jeopardised by the current economic climate and prolonged volatility in financial markets; banks and other investment institutions not being robust enough to survive future economic changes	Loss of principal investments placed	Bill Lewis	2	5	10		
31	Service: Communities & Citizen Services -Service standards and quality provision - Service not delivering quality services caused by a lack of resources and employee deployment. Fragile procedures, process and delivery mechanisms. Internal and external monitoring and auditing principles not robust	Failure to achieve industry recognised accreditation (i.e. Quest, Green Flag, ISO). Increased costs. Corporate and service objectives fail to be delivered. Reputational damage. Reduced ability to draw down external funding	Hagan Lewisman	2	3	6		
32	Service: Planning & Regulation - Income Targets - Non achievement of income targets caused by the impact of macro-economic issues - falling number of planning applications, visitor spend etc	Not meet budget estimates, Deficit in corporate budget. Ultimately impact on resources available to the council to provide services	David Butler	3	3	9		
33	Service: Property Assets - Lack of asset management system - Data management processes improvement. No asset management system in place to store and analyse data.	Unable to plan or programme work in a timely fashion, delays in letting of properties and potential non-compliance. Risk of decreased insurance cover or increased premium costs. Lack of active management of portfolio reduces performance.	Malcolm PEEK	4	4	16		
34	Service: Law, Governance and Strategy - Resilience of service - Inability to effectively deliver services required by the Council to deliver critical projects and support statutory and non-statutory functions with a direct impact on risk, compliance, expenditure and income to the Council. Inability to react as required in the event of a major incident leading to more outsourcing or delays. Inability to retain and recruit lawyers to permanent posts, leaving the service dependent on locum resources and therefore exceeding salary budget. Capacity and resource issues delaying restructure. Hope to progress by the end of 2025.	Reputational damage; adverse costs; greater reliance on external services and therefore increased costs. Ability to meet Council's own requirements prejudiced.	Emma Jackman	4	4	16		
35	Service: Planning & Regulation: Government legislation, Democracy and Localism Bill - Substantial changes to the planning system. Relaxation of Change of Use, Prior Approval regime extended Impact of expectations of politicians and the local community impacting on resources and prioritiesCaused by government legislation leading to need to redesign processes.	Lack of capacity to meet changes coming from government, undermining of the delivery of local policy objectives (e.g. protection of key employment sites). Neighbourhood Plans put pressure on resources and/or seek to challenge City Council	David Butler	4	4	16		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
36	Service: Communities & Citizen Services- Insufficient revenue and capital for each proposed development. Caused by current economic climate/Comprehensive spending review	Developments do not take place	Hagan Lewisman	3	3	9		
37	Service: Property Assets - Income Targets / high costs - Non achievement of Town Hall income targets caused by the impact of economic circumstances; delays in building maintenance, major disruption to business e.g. fire, major repairs.	Reduction in income and revenue	Malcolm PEEK	2	2	4		
38	Service: Planning & Regulation - Opposition to emerging statutory plans - Opposition to emerging statutory plans, and to planning applications and decisions; A) vocal and organised local opposition before decision; B) opposition at Examination or committee stage; C) Legal Challenge after Adoption or planning decision. Caused by local public, groups, organisations or political parties object to policies in emerging documents and choose to use many and all avenues to express objection, including some outside normal procedures and all drawing a lot of media attention. Or opposition to planning applications at, pre- application, after validation. Committee and post decision stages	Delay, extra costs, reputational risk, possibly amendments to policies.	David Butler	3	3	9		
40	Service: Communities and Citizens: Budget and Income - Trading Income from Event hire caused by changes to Broad Street, COVID-19, the cost of living impact on the events sector and targeted campaigns against event organisers	Budgeted Target not met	Paula Redway	3	2	6		
42	Service: Communities and Citizens - Breach in H&S leading to the closure of a building, injury/fatality/ closure of leisure facility and/ or service disruption caused by failure of health and safety management and monitoring	Risk of injury or death to persons. Reputational risk. Financial claims. Risk of facility closure or service disruption	Hagan Lewisman	2	4	8		
45	Service: Communities and Citizens - Loss of key staff members - Prolonged absence or badly planned leave may result in the service area not delivering on its objectivesThis might be caused by staffing structure being quite tight, meaning that there can be resource issues	Non delivery of service objectives	Helen Bishop	3	3	9		
46	Service: Law, Governance and Strategy- External Legal Resources - The use of the budget is reactive and therefore, as unexpected corporate issues arise, external legal costs increase, which will lead to an overspend on the legal services budget, and potentially pressure on other service area budgets as they may need to fund work.This is caused by the unpredictability of costs which may arise. Due to increase demand in client departments for legal support, capacity issues continue which has an impact on external legal advice requirements. Inability to use usual procurement route of EM Lawshare Framework meaning using higher priced frameworks as an alternative.	Budgetary pressure	Emma Griffiths	5	3	15		
47	Service: Communities and Citizen Services - Insufficient resource and market demand to deliver financial plan - A stringent focus is on this work, although the macro environment continues to increase the challenges. There is a risk of there not being enough resource (staff time), and/or market demand to deliver the level requiredNot enough staff time / insufficient demand for additional activities	Reduced delivery of efficiencies	Helen Bishop	3	3	9		
48	Service: Planning & Regulation- Public Health Protection - Threats to public health eg., from food borne communicable disease. Uncontrolled spread of diseases; illness and possible deaths; damage to Council reputation.	Failure to adequately control/respond to outbreaks.	David Butler	3	3	9		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
51	Service: Financial Services - Budget Management - Inability to forecast outturn effectively due to limited or incorrect information. There are significant efficiency savings and service reductions across the board as a result of budget process, and these may be difficult to deliver, or to understand if they will be delivered timely.	Increased use of balances or further reductions to be identified	Clare Paterson	2	2	4		
52	Service: Communities and Citizen Services - Safeguarding - Safeguarding vulnerable groups including children. Poor training of and recognition of safeguarding principals. Poor monitoring and compliance regimes	Risk to Council reputation. Risk of allegation. Risk to public safety	Hagan Lewisman	2	4	8		
53	Service: Law, Governance and Strategy - ICT - System failure without cloud based systems will significantly impact on the Council being able to meet statutory obligations and will impact on the delivery of corporate priorities and decision making. Risks generated from unauthorised access from outside actors, ICT issues such as server failure and failure of third party systems and devices	Failure to meet statutory obligations, inability to take decisions and protect the interests of the Council	Emma Jackman	3	3	9		
54	Service: Financial Services - Corporate Fraud - Suppliers set up on payment system that are not genuine or requests to change bank account details that are not genuine. Third parties attempt to defraud the council	Payments being misappropriated, loss of public monies	Annette Osborne	2	3	6		
55	Service: Law, Governance and strategy - Legal Income - Income target not achieved placing pressure on the overall budget of legal services leading to overspend. This would be caused by an inability to manage or control demand of work which generates income	Budgetary Pressure	Emma Jackman	4	4	16		
56	Service: Financial Services - Management effectiveness and employee ability to deliver services - Excessive pressure placed on staff and managers. Caused by increased workloads and increased volumes of emails and online meetings in addition to increasing demands arising from the "day job"	Staff burnout; increased incidence of stress; lack of capacity to deliver work demands	Nigel Kennedy	3	4	12		
57	Service: Communities & Citizen Services - Complaints Handling - Failure of corporate complaints process resulting in Ombudsman intervention. This might be caused by a reliance on limited number of officers	Reputational risk. Additional complaints and/or ombudsmen intervention.	Helen Bishop	4	3	12		
58	Service: Financial Services - Health & Safety - Staff are subject to volatile situations in the course of their duties and possible harm. They have robust & challenging conversations with subjects of investigation during interviews and visits leading to escalation tension and possible physical assault.	Staff subject to harm and subsequent short or long-term sickness, reduced resources.	swarner2@oxford.gov.uk	2	2	4		
59	Service: Communities & Citizen Services- Community Cohesion Erodes - The risk that social and community cohesion will be negatively affected, detracting from the Council's aims to encourage strong and active communities. Britain's exit from the EU, shifts in national politics, and subsequent shifts in society's perceptions.	1.Uncertainty and instability in political climate leads to social and political polarisation - this in turn could lead to political fallout/shifts in management and risk of the council developing a bad reputation 2.Political instability means social instability / unrest, leading to higher rates of hate crime. Deepening cleavages in society divides communities, with settled communities feeling neglected by local authorities in favour of new/emerging communities - diversity is seen as a threat for some. 3. Social unrest can have negative effects on health, which carries risk of widening existing health inequalities across the city.	Helen Bishop	3	3	9		
60	Service: Financial Services - Budget and Income - Failure to deliver profiled trading income due to external factors. Caused by reduced appetites for external clients and partners to spend on counter-fraud services due to cost of living crisis, dwindling council finances, politics or competing priorities	Trading income targets not achieved, medium term financial plan compromised, budgetary overspend.	swarner2@oxford.gov.uk	1	2	2		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
61	Service: Financial Services - Performance - Failure to achieve service plan targets and objectives due to unplanned staff absence or turnover including sickness. Some fixed term contracts in the team increase risk of staff looking to alternative roles with other organisations.	Targets not achieved, trading income compromised, inability to service external contractual commitments	swarner2@oxford.gov.uk	2	2	4		
62	Service: Law, Governance and Strategy - Budgetary issue - Increase in the cost of postage by Royal Mail causing budget pressures. The rise in the cost of postage has increased in recent years (with another in-year rise of 15% due)	Pressure on budgets beyond what is funded	Martin John	3	3	9		
64	Service: Law, Governance and Strategy - FOIA and DPA compliance - Failure to comply with statutory deadlines in terms of information Requests and Data Subject Access Requests. Failure to properly manage personal data. Failure of other council departments and officers to contribute and approve in timescales required	Reputation risk, ICO action could result.	Emma Jackman	3	3	9		
65	Service: Law, Governance and Strategy Data Protection - Data Protection Breach and Non-Compliance with Data Protection Law caused by a failure of the organisation to adhere to data protection law would cause capacity and work implications issues for the team. Outside actors having unauthorised access to data. Failure of the Council's departments and suppliers to properly safeguard data	Increased workload on a small team. Organisation could suffer reputational damage and/or have fines levied against them by ICO. Reputational risk for the service and Council. Financial penalties for Council and employees. Potential litigation against the Council with damages and adverse costs	Emma Jackman	4	5	20		
66	Service: Communities & Citizen Services - Sponsorship - Failure to achieve sponsorship income targets because of the business climate	Difficult to sustain city events and cultural activity on an annual basis.	Paula Redway	3	2	6		
67	Service: Financial Services - Procurement - If there is a failure to follow best procurement practice, then there is an increased risk of challenge. The reputation of the Council will suffer, and there may be financial loss because of challenges and re-running procurements, as well as delays in delivering priorities.	Reputation of Council. Financial penalty. Poor decision making and financial loss due to potentially awarding a contract to the wrong supplier. Potential delays in achieving organisational objectives as a result of challenge and if decision set aside	Annette Osborne	3	4	12		
68	Service: People - Corporate Management - Managers not equipped to meet the changing needs of the organisation. Development of Fit for the Future Programme, gives new accountabilities and responsibilities for Leaders	If not addressed service improvements and efficiencies not delivered	Gail Malkin	2	2	4		
69	Service: People - People team - Resources insufficient to meet the growing demands of the service. The work demands over which we have no control, such as new starters, pension queries, employee turnover and increasing numbers of payroll transactions, is putting additional pressure on the operations work of the team. Additional temporary resource is coming to an end without efficiency savings having been met, partly due to the ASM platform not leading to time savings.	Service quality is dropping and team is reporting workload pressures and work-related stress. Will need to cut back on service offered and extend service standard delivery times.	Gail Malkin	3	3	9		
70	Service: People - People team - Loss of key talent. Reliance on individual contributors with no cover as team is small. Example - one recruitment consultant - if she left - we would have a limited and reduced recruitment service until replaced	difficulty filling hard-to-recruit roles and longer time to recruit times more generally	Gail Malkin	3	3	9		
71	Service: People - People team - Data protection legal compliance. Historical poor administration practices and pressures of work have meant that data has not been managed in line with data retention schedules.	non-compliance with data protection law	Gail Malkin	3	2	6		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
72	Service: Communities & Citizen Services - Budget pressures - Budget pressures in Customer Services, including Customer Contact and Corporate Support teams. Increased workload Improvements not delivered to improve services and reduce resource requirement Insufficient funding for workforce	Service savings not acheived	Helen Bishop	2	2	4		
74	Service: Economy, Regeneration and Sustainability - Staff Recruitment - Difficulty in recruiting on proposed terms and conditions - often FTC roles in the service. Terms and conditions of employment are not sufficiently attractive to attract and retain staff	Required skills and capacity are not available to deliver required work programmes or staff turnover results in the loss of skills from the team.	Clive Tritton	2	2	4		
75	Service: Economy, Regeneration and Sustainability - Managing staff capacity - Little capacity in team to allow cover for other team members if required. Internal and external projects and programme are running to very similar timescales across economic development, City Centre, Green Transport, Housing Deliery and Regeneration.	Staff resource and work needs to be carefully prioritised to handle demand. Some programmes are outside our control particularly in Green Transport and Economic Development. Difficultly to provide project cover if regeneration manager or housing supply officer is off work or leaves at short notice.	Clive Tritton	3	3	9		
76	Service: Economy, Regeneration and Sustainability - Good governance - Development board and associated groups within the governance process are not utilised effectively as it could be across the council. Lack of knowledge of how and when to utilise development review group and development board.	Board is reactive or not utilised leading to project problems.	Clive Tritton	3	2	6		
77	Service: Economy, Regeneration and Sustainability - Health & Safety - Poor health and safety compliance due to inconsistent levels of experience and training. Inconsistent levels of experience and training in project managers. Lack of corporate resource and training in H&S protocols.	Health and safety incidents and non compliance during projects which may cause significant project delays, fines or legal action and more widely causes risk to staff.	Clive Tritton	3	3	9		
78	Service: Economy, Regeneration and Sustainability - Support Team Capacity - Lack of specialist advice or delays to projects caused by support team capacity. Commitments to projects and resourcing of support services (procurement, legal, finance, communities, planning) have not been considered in tandem and therefore resourcing in support areas cannot meet requirements of capital projects	Project delays and potentially inaccurate information reported through governance process through lack of specialist advice	Clive Tritton	3	3	9		
79	Service: Economy, Regeneration and Sustainability - Staff Budget - Lack of budget to maintain staffing levels across service. Regen team due to failure to capitalise on the regeneration managers time and lack of funding to maintain current levels for city centre management and economic development teams. The staff budget relies on capitalising time and external funding sources	Not being able to maintain staffing level of teams which would mean reduced resource to bring forward projects and programmes and loss of good staff that have often been difficult to recruit	Clive Tritton	2	2	4		
80	Service: Economy, Regeneration and Sustainability - Housing supply funding - Reduction in funding available impacting housing delivery targets. This is caused by limits to HRA borrowing capacity/ change to HRA business plan, borrowing cost rises making schemes unviable, Lack of Homes England funding rounds, Poor outcome from RSH inspection rates (RP) landlord service any of the compliance criteria/ Annual HE Investment Partner compliance return not considered satisfactory, loss of awarded funding due to not meeting grant terms	Reduced delivery results in increasing further the backlog of housing need if we do not secure addiitonal affordable housing stock and risk of grant incuding RRTBRs being returned with punitive interest	Dave Scholes	3	3	9		
81	Service: Economy, Regeneration and Sustainability - Housing project delays - Programme slippage puts housing delivery targets at risk. Causes could be wide ranging for example risks relating to meeting planning policies, SSEN grid capacity to 2028/ 2032; and also water and sewage capacity concerns, site specific issues	Either projects are lost from programme or are delayed which adds further cost risk or funding is lost as grant terms not met risk of needing to return Right to Buy receipts if not spent with punitive interest	Dave Scholes	3	3	9		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
82	Service: Economy, Regeneration and Sustainability - Lack of key partner engagement - Lack of engagement from partners to deliver Council priorities in Economic Development and City Centre. Third party decision making or capacity issues result in lack of support financially or in kind for kety initiatives/projects	Unable to deliver on strategy actions or priorities or fund associated projects/staff or creates unplanned financial pressure	Rupert Waters	3	3	9		
83	Service: Economy, Regeneration and Sustainability - Resource pressure from partners or stakeholdersKey Stakehodlers or partners' projects and prioties create council resource implicationsThird party decision making result in pressure for officer or member support financially or in kind for their intiatives/projects	Unable to resource either the partner priority or our own priorities or creates unplanned financial pressure	Rupert Waters	3	3	9		
84	Service: Property Assets - Investment into stock and existing properties - Under investment or lack of funding to invest into properties to maintain condition. Caused by budgets not sufficent to match property needs	Properties become poor condition to let, reduction in income and potential non-compliant or dangerous.	Malcolm PEEK	3	3	9		
85	Service: Communities & Citizen Services - Customer Services - Applications Team KPIs may be unable to be met due to taxi licensing not resourced appropriately. Taxi licensing is not resourced appropriately by the service due to them not agreeing funding	Performance affected and KPIs unable to be achieved	Mark Chandler	2	2	4		
86	Service: Communities and Citizen Services - Customer Services - Customer behaviour in the Westgate library or larders putting our staff at risk either through physical or mental abuse. Unacceptable behaviour either verbally or physically from customers who visit the Westgate library	Staff are physically or verabally abused	Mark Chandler	2	3	6		
87	Service: Communities & Citizen Services - Customer Services - Wellbeing of staff working from home and being able to access support as and when required. Majority of staff working from home regularly without face to face contact	Staff feeling isolated, struggling mentally and not getting the support they need	Mark Chandler	2	2	4		
88	Service: Communities and Citizen Services - Customer Services - Staff not following data protection processes resulting in breaches. Staff not following data protection guidelines or having the appropriate up to date training and awareness of procedures	Data protection breaches resulting in unhappy customers	Mark Chandler	2	2	4		
89	Service: ICT - Retaining skilled ICT professionals is difficult because of uncompetitive salaries in some areas.	Staff leave.	Rocco Labellarte	1	3	3		
90	Service: ICT - Addressing ICT staff skills gaps. Single points of failure, in particular with the absence of business owners and super-users within the services.	Delays in resolving issues for individuals and services.	Rocco Labellarte	3	3	9		
91	Service: ICT - Resources insufficient to meet demands of service. Caused by competing priorities (BAU, Projects, non-ICT issues passed to ICT).	Demand exceeds capacity, and staff work long hours, struggling mentally (as evidenced by the H&S Survey)	Rocco Labellarte	3	3	9		
93	Service: Economy, Regeneration and Sustainability - Capital Project Delays - Significant delays of capital projects. Caused by unforeseen consequences e.g. planning risks, external factors, competing asks on resources, contractor insolvency or supply chain issues	Reduced performance and missed targets on capital projects which affect overall expenditure, MTFP spend or grant stipulations	Clive Tritton	3	3	9		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
94	Service: Financial Services - Property Insurance - If the Council is unable to provide adequate information about the construction of existing buildings in its ownership and their valuations, its Insurers may continue to provide insurance that does not meet the full needs of the Council and exposes it to uninsured risks and financial loss. The Council has been unable to provide sufficient information to Insurers about the construction of properties and the cost of their reinstatement.	Only one Insurer quoted at the last tender and the insurance cover provided has significant weaknesses. The property valuations that the Council has may be wrong, resulting in properties being under or over insured. The Council's properties are insured on a declared value basis, they might be underinsured because of inflation. Unoccupied properties are uninsured. The Council is unable to go to tender before it improves the information that it has.	Nigel Kennedy	2	4	8		
95	Service: Property Assets - Capital Receipts - Inability to reach capital receipts budget because of market forces, being dependant on engagement of 3rd parties. Selling from investment portfolio reduction in income	Reduced capital causes increased borrowing or reduction in capital programme	Emma Gubbins	2	3	6		
96	Service: Property Assets - Lack of legal capacity - If there is a lack of legal support, the Council will be unable to meet income, capital receipt, and project targets. Alternatively, external legal spend will be more costly and will result in an increase in financial pressure. This is caused by insufficient base budget in Law & Governance results in insufficient capacity.	Reduced income, reduced capital receipt, risk of legal challenge, reputational damage, increased complaints.	Emma Gubbins	4	4	16		
103	Service: Planning & Regulation - Regulatory compliance - Failure to comply with regulations and statutory compliance. This is caused by insufficient resources impacting on ability to ensure compliance, a culture that fails to enforce policies; a lack of knowledge exacerbated by staff turnover; changes in legislation; increased demand leading to mistakes by staff.	A loss of public trust and confidence in the Council's ability to govern effectively. Negative media attention will harm the Council's reputation. Elected Members and senior officers face criticism. The Council's ability to deliver services is undermined as important decisions are made incorrectly. Disputes among Members and staff. Fines and penalties and loss of grants and funding.	David Butler, Richard Adams	2	4	8		
108	Service: Housing - Failure of Homeless Prevention Activities - Temporary Accommodation - Failure to effectively manage the financial burden and demand for temporary accommodation in accordance with the individual needs of clients. This is caused by service delivery failure - homeless prevention activities become unable to meet a sustained increase in homelessness in Oxford leading to increased homeless placements/TA costs.	Reputational Impact - Increase in reviews - client's taking legal action/ appealing against their housing decisions, clients approaching media to highlight their case and shame council. Financial Impact - Increase in temporary accommodation costs adding pressure to general fund. Legal Impact - Council's inability to fulfil its duty to provide or secure the provision of advice and information about homelessness and the prevention of homelessness. Overall Impact - If this risk was realised, this would hinder the operation of this service as the financial viability of this service would be called into question and related issues impacting to regulatory compliance would impact on OCC.	Nerys Parry	2	4	8		
109	Service: Housing - Failure to meet Homeless Temporary Accommodation Demand - Inability to keep up with increasing demand as a result of government changes in eligibility assistance criteria, including those who are eligible as a result of their immigration status, resettlement, changes in priority. This also includes the wider contextual imbalances, within council's own stock and private housing. This might be caused by service delivery failure - homeless prevention activities become unable to meet a sustained increase in homelessness in Oxford leading to increased homeless placements / temporary accommodation costs due to changes in Government legislation/policy.	Reputational Impact - Inappropriate use of social media by clients to amplify their issues - these could also result in loss of trust and support from key stakeholders and wider local government community. Financial Impact - Inability to secure sufficient homelessness grant funding that meets the increasing demand. Legal Impact - The council is not obliged to house everyone who is experiencing or at risk of homelessness. However, it is required to take action depending on the circumstances of each case. It must comply with relevant legislation and have regard to the statutory code of guidance. Overall Impact - Limited impact when variables such as current Government welfare and immigration policy is considered but this is subject to review if there were Government policy changes.	Richard Wood	2	3	6		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
110	Service: Housing - Delayed new build developments/acquisitions - A failure to secure pipeline of affordable supply arising from council's housing development programme, sourcing of PRS acquisitions and maximising on supply opportunities including downsizing, securing nomination rights, empty properties and fast void turnarounds. This might be caused by service delivery failure - new build completions of social housing are delayed due to developers failing to complete on time. Planned acquisitions slow down to a lack of supply of suitable properties in Oxford. Changes to the PRS Housing Markets including the Renters Rights Bill reduces the supply of affordable PRS available. Improvements to the Void process fail to reduce Void Re-let Times.	Reputational Impact - Inability to deliver on council housing programme targets will impact on housing waiting list, but will also impact negatively, loss of trust from key stakeholders and funding partners. Financial Impact - Delays or non-delivery of council housing programme will severely impact and add further financial pressures on HRA Business Plan as well as add further pressures on General Fund as families will need to remain in Temporary Accommodation. Legal Impact - It is a legal requirement to ensure that TA is suitable and families with children do not spend over 6 weeks in B&B, households believing they have been offered unsuitable accommodation make take legal action against council. Overall Impact - TA provision appears on target but this is subject to review in the light of regular and updated data	Dave Scholes, Nerys Parry	2	4	8		
111	Service: Housing - Implementation of the Landlord Services Re-Organisation - risk of not delivering the re-organisation of landlord service in a timely manner and as a consequence it does not deliver the changes required including service improvements, culture change and achieve better outcomes for tenants. This might be caused by service delivery failure - the landlord services re-organisation is not completed within the expected timelines due to delays in new staffing structures and processes being put in place.	Reputational Impact - inability to establish a service structure that is more fit for purpose, responsive to new regulatory requirements and changing needs of tenants and homes. Financial Impact - Inability to realise reorganization benefits such as improving efficiency and effectiveness of service delivery and achieving better outcomes for the HRA. Legal Impact - New SHR regulatory requirements means the council as a landlord has a duty to comply and meet required standards, failing to do so it will breach and face sanctions imposed by the SHR Overall Impact - Limited impact as the initial work for the re-organisation has begun and good progress has been made.	Nerys Parry	2	4	8		
112	Service: Housing - Failure in resident involvement activities/compliance with the Social Housing Act /Consumer Standards - Tenant voice - failure to improve tenant involvement activities/implement the reset programme to help deliver tenant led recommendations and priorities and organisation objectives to comply with the Transparency, influence and accountability standard. Service Failure - Tenant Involvement governance arrangements and activities are not fit for purpose and do not allow the tenants voice to be heard/meaningful involvement in line with responsibilities under the SHA/Consumer Standards.	Reputational Impact - A poor service offer/lack of tenant involvement risks an increase in complaints as it fails to provide tenants with the platform and opportunity to help shape and add value to service improvements (and could also result in Regulator/Ombudsman intervention). Financial Impact – failure to establish efficient routes/platforms for tenants to raise their voice/concerns can be costly and also fails to capture financial efficiencies. Inefficient service delivery can be costly and lead to adding financial pressure on HRA. Legal Impact - New SHR regulatory requirements means the council as a landlord has a duty to comply and meet required standards, failing to do so it will breach and face sanctions imposed by the SHR. Overall Impact - There are currently no systemic arrangements to consult with tenants so this is a tangible risk in terms of SHR deciding infringements have taken place. However, to mitigate this risk, evidence can be presented to the SHR that work has begun to address this core issue. In respect of service delivery, involvement with tenants on a systematic basis, as envisaged in the Cabinet report of December 2024 on Tenant Management, would help drive up customer satisfaction levels.	Nerys Parry	5	4	20		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
113	Service: Housing - Inspection by the Regulator of Social Housing and Inspection readiness - failure to evidence the implementation/ adherence to Social Housing Regulator's consumer standards across housing - and this resulting in a [C3] grading following inspection. Service Failure - OCC current/planned activities fail an inspection by the Regulator of Social Housing that as a social landlord OCC is complying with the Social Housing Act / regulator consumer standards.	Reputational Impact - A low grade will impact negatively on council's overall reputation and loss of trust from tenants who will perceive they are not getting the services they need and value for money for their rent Financial Impact - A C3 grading will indicate serious failings that may affect housing services quality, such as delayed repairs or inadequate safety measures - a reactive approach to addressing these issues will add financial pressure on HRA Legal Impact - A low grade judgement from SHR will impact negatively on council's reputation - reflecting that it does not meet SHR governance requirements. These would be issues of serious regulatory concern where urgent action will be required to improve its position. Overall Impact - This is a tangible risk as while there is a body of work to ensure compliance requirements are met, the full programme of work is yet to be implemented.	Nerys Parry	4	4	16		
114	Service: Housing - Leaseholder Services fail to comply with the Social Housing Act / Consumer Standards - Leasehold - failure to deliver a fair, transparent and compliant leasehold service to leaseholders that meets their needs and is reflective and demonstrates value for money of their management fee. Service failure - improvements to leaseholder compliance activities are delayed and OCC is unable to comply with the SHA/Consumer Standards for leaseholders	Reputational Impact - A failure to provide a fair and compliant service to leaseholders will negatively impact on council's reputation and perception that it is not delivering compliant services to leaseholders Financial Impact - A poor leasehold service offer, reduces council's ability to collect service charges and recover works expenditure and secure funding back to the HRA Legal Impact - Leaseholders have the right to get information about service charges, and be consulted maintenance and running costs. The inability for council to comply with these function can lead to leaseholders challenging these through the First-tier Tribunal (Property Chamber) Overall Impact - This is a tangible risk as while there is a body of work to ensure compliance requirements are met, the full programme of work is yet to be implemented	Nerys Parry	3	3	9		
115	Service: Housing - Implementation of the Development plans for HRA Asset Management - There is a risk of not changing policies, processes and procedures for HRA property service functions in a timely manner and as a consequence it does not deliver the changes desired including a fit for purpose client team to effectively commission and oversee delivery of works and services, establish the service improvements required including around repairs, safety and compliance. The cause might be that the HRA Asset Management re-organisation is not completed within the expected timelines due to delays in new staffing structures and processes being put in place.	Reputational Impact - inability to establish an HRA service structure that is more fit for purpose, responsive to new regulatory requirements and changing needs of tenants and homes. Financial Impact - Inability to realise reorganisation benefits such as improving efficiency and effectiveness of service delivery and achieving better outcomes for the HRA Legal Impact - Inability to establish a service structure that is responsive to meeting new regulatory regime - social housing regulator consumer standards Overall Impact - This risk would, if realised, have a significant impact on the operation and viability of HRA services	Nerys Parry	3	4	12		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
116	Service: Housing - HRA Investment and Management Controls fail to comply with the Social Housing Act/Consumer Standards. 5 year investment programme - There is a need for the council as a landlord to set out the strategic direction for OCC's HRA capital management and investment plans, which must also form part of the medium to long term financial and service planning and budget setting process. It also risks complying with Social Housing Regulator expectations in relation to the council having the investment management and controls in place.The Council's current/planned investment activities fail to comply with the Social Housing Act /Regulator consumer standards.	Reputational Impact - Failure to plan and develop short/medium/long term investment will prove difficult to evidence compliance and satisfy Social Housing Regulator regulatory requirements relating to effectively planning maintenance and delivering good outcomes and value for money to the HRA. Financial Impact - Risk of not being able to adopt investment planning risks the council in continuing to commission works in a reactive manner which can be costly and add further financial pressure to the HRA. It also risks in the Social Housing Regulator highlighting this as failure for delivering good outcomes to tenants and effective management and governance of HRA . Legal Impact - Risk of council as a landlord not meeting SHR Consumer standards - in particular Safety and Quality Homes standard where efficient knowledge, planning of assets and maintenance must be evidenced. Overall Impact - Would be a significant if this risk was realised in meeting social housing targets in terms of overall delivery of the programme.	Nerys Parry	3	3	9		
117	Service: Housing - HRA Asset Management Safety and Compliance - The council risks inability to comply with legislation and on-going changes relating to safety which form part of the new regulatory regime that bring increased scrutiny of council's approach to meeting all applicable fire, health and safety obligations to ensure the safety of all tenants. This would be caused by the council's safety and compliance activities failing to comply with the Social Housing Act customer standards.	Reputational Impact - Failure to evidence and satisfy the Social Housing Regulator that OCC is complying with its Safety requirements will bring the council into disrepute, result in a loss of confidence and concerns from tenants about their safety Financial Impact - Failure to meet safety and compliance requirements will question council's role as a landlord and its ability to effectively govern and have efficient management of its HRA and maintenance plans - as well as its requirements to meet decent home standards Legal Impact - Bringing the council into disrepute and lack confidence in council's ability to meet its landlord legislative obligations and intervention from the Social Housing Regulator. Overall Impact - This is a tangible risk as while there is a body of work to ensure compliance requirements are met, the full programme of work is yet to be implemented. There are yet to be fully approved technical policies, such as in damp and mould or asbestos, to take just two examples, which ensure there is standard compliance practices to meet safety standards. A mitigating factor is the institutional memory within OCC on such matters but if there was a staff turnover, this risk may be accentuated accordingly.	Nerys Parry	3	4	12		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
118	Service: Housing - Repairs Maintenance - The council risks being unable as a landlord to comply with Social Housing Regulator consumer standard (Safety and Quality) to provide an effective, efficient and timely repairs, maintenance and planned improvements service for the homes and communal areas for which the council is responsible. A failure would be caused by the council's current/planned activities on property maintenance and repairs taking longer than expected and the council fails an inspection by the Regulator of Social Housing that as a social landlord OCC is complying with the Social Housing Act / regulator consumer standards.	Reputational Impact - OCC's inability to effectively manage repairs can lead to increase in complaints and escalating costs, loss of rent and spend on HRA. This in turn will bring Ombudsman / Social Housing Regulator involvement and bring the council into disrepute. Financial Impact - OCC's inability to demonstrate effective governance and management of its HRA finances. Inability to manage repairs expenditure. Legal Impact - bringing the council into disrepute and lack confidence in council's ability to meet its landlord legislative obligations and intervention from the Social Housing Regulator . Overall Impact - while this risk, if realised, would be significant - steps have been made to mitigate this risk. The decision of the Cabinet to approve the HRA Business Plan, Asset Management and 5-Year Investment Programme and the Tenancy Management and Involvement programme has led to governance structures being introduced and a work programme being developed to include the issue of repairs	Nerys Parry	2	4	8		
119	Service: Housing - Voids - There is a risk that the council as a landlord will not comply with the Social Housing Regulator consumer standard (Safety and Quality) and provide an effective, efficient and timely voids service procedure for the homes which the council is responsible for.This would be caused by void works taking longer than expected and the council fails an inspection by the Regulator of Social Housing that as a social landlord OCC is complying with the Social Housing Act / regulator consumer standards.	Reputational Impact - OCC's inability to effectively manage voids can lead to increase in complaints and escalating costs, loss of rent and spend on HRA. This in turn will bring Ombudsman / Social Housing Regulator involvement and bring council into disrepute. Financial Impact - OCC's inability to demonstrate effective governance and management of its HRA finances. Inability to manage void expenditure and rent loss as a result of long term void turnarounds can impact on income to HRA. Legal Impact - bringing the council into disrepute and lack confidence in council's ability to meet its landlord legislative obligations and intervention from SHR . Overall Impact - while this risk, if realised, would be significant - steps have been made to mitigate this risk. The decision of the Cabinet to approve the HRA Business Plan, Asset Management and 5-Year Investment Programme and the Tenancy Management and Involvement programme has led to governance structures being introduced and a work programme being developed to include the issue of voids	Nerys Parry	2	4	8		
120	Service: Housing - Workforce, skills and capacity for service delivery - There are risks and challenges across a range of service areas within the housing service, including recruitment, retention of staff, and skilled workforce. Experienced staff might leave the council or move to new posts. Existing and new staff will require training on existing/new processes, best practice and changes in legislation, including the Social Housing Act, Renters Rights Act and Awaabs Law.	Reputational Impact - Inability to have the right, skilled resources can impact on service delivery as well as affect the well-being of employees. In addition, restructuring may require employees to adapt to new roles, learn new skills, and cope with job loss or job hunting. Financial Impact - Inability to have the right workforce in place can lead to substantial financial burdens added to the HRA and reduce resilience of services. This can heighten the over-reliance on interim workforce which can be disruptive to service due to the instability of service, loss of skills/knowledge . Legal Impact - The council as the local housing authority has the regulatory requirement to provide free housing advice and support - ensuring that services are adequately resourced and skilled Overall Impact - Significant impact to the operation of the HRA and wider social housing programme	Nerys Parry	3	3	9		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
121	Service: Housing - Housing IT and Systems - the ineffectiveness and transition of new and legacy systems can significantly impact the efficiency and effectiveness of service delivery across housing and ultimately tenant customer satisfaction. This would be caused by Housing IT systems failing to support the business needs of the service, affecting service delivery times and customer satisfaction levels	Reputational Impact - Inefficient systems, software, and hardware can slow down daily tasks, leading to a decrease in staff productivity and impact on service delivery overall to tenants Financial Impact - Increased Costs as a result of inefficient systems that do not talk to each other - consequently leading to higher operational costs. Maintaining outdated systems often requires more resources and specialised support, which can be expensive and add financial pressures to HRA Legal Impact - Council as a landlord has the obligation to ensure the integrity and security of systems it has in place Overall Impact - delays in service delivery, increased customer complaints and staff dissatisfaction/lower morale	Nerys Parry	3	3	9		
122	Service: Housing - Data and performance - There is a risk that there will be a failure to have effective data and performance management systems in place. These are critical for making informed business decisions, both strategically and operationally. Existing processes and procedures fail to accurately record all data required on tenants (and housing applicants) - including protected characteristics, property/building information - including component data, to ensure activities and priorities for compliance, performance management/service improvement/risk management are all data led.	Reputational Impact - As the local housing authority, the council is required and responsible for ensuring the integrity of data, how it uses these for making decisions and reporting on performance to tenants, Regulator - including government returns. Failure to do this will result in loss of confidence and greater scrutiny from the Social Housing Regulator Financial Impact - Poor data and performance management impacts on the council's ability to deliver its HRA Business Plan priorities and reduce pressures on GF. For e.g.; unplanned cost increases, revenue reduction and poor client management functions - including ODS/contractors. This could also impact on council's ability to demonstrate its value for money duty across both HRA and GF Legal Impact - OCC as a landlord has the obligation to ensure the integrity and security of systems it has in place. It has duty to ensure the integrity of any data returns it submits to govt or social housing regulator Overall Impact - This is a significant risk as while the data function exists, the QL system needs to be fully operational. The need for reliable and up to the minute data is critical for all aspects of the HRA programme and therefore the need for data to be of consistently high quality remains paramount to the good functioning of the HRA service.	Nerys Parry	3	4	12		
123	Service: Housing - Financial management of the Housing Revenue Account - There is a risk that the council, which has responsibility for the efficient and effective management of the HRA, fails to account and evidence the expenditure and income against the running of its housing stock. The council must provide sufficient evidence to the Social Housing Regulator of effective and efficient financial management of the HRA for OCC tenants and also compliance with expectations as a social landlord.	Reputational Impact - Failure to sufficiently evidence the efficient and transparent use of HRA can negatively impact on council's reputation and intervention from regulator. This can also lead to loss of trust from tenants - and raising concerns / complaints Financial Impact - Failure to evidence and satisfy the SHR regulator inspection criteria "financial resilience" - which covers the extent on how HRA funds generated from tenants rent collection is invested back into the HRA for asset and service improvements and secure good tenant outcomes Legal Impact - The HRA is a ring-fenced account within the General Fund - with income and expenditure being prescribed by statute with no general discretion to breach the ring-fence Overall Impact - This is a significant risk as there is data to suggest cost overruns have occurred that is not in line with budgetary expectations. The risk has been mitigated, to a limited extent, by internal cost control mechanisms.	Nerys Parry	3	4	12		

Ref	Risk Description	Consequence	Owner	Current Probability	Current Impact	Risk Score	Control description	Progress
124	Service: Housing - Inadequate controls to manage HRA financial spend - result in an overspend, programme targets not being met and impacting on the ability to deliver services within the HRA. This might be caused by controls and clienting arrangements being inadequate to meet service needs.	Reputational Impact - failure to ensure effective joint working between OCC and service suppliers would impair the reliability of the maintenance and upkeep of the housing stock. This could lead to tenants expressing dissatisfaction which would damage the reputation of the OCC with tenants. If tenants decided to express concern on social media or to specific media outlets this would damage the reputation of OCC amongst the wider public and with key stakeholder groups as well as damage the relationship between OCC and Social Housing Regulator which could lead to infringement actions taken by the regulator. Financial Impact - is significant as it could lead to unsustainable budget overspends due to, amongst other factors, a lack of a joined up approach towards budgetary and programme works between OCC and ODS. This could undermine the HRA Budget and add financial pressures to the HRA business plan. The efficiency of effective financial controls would be brought into question as a direct consequence of the realisation of this risk profile. Legal Impact - disruptions in the working relationship between OCC and service suppliers that led to issues with maintenance and issues with budgetary controls would mean that this could lead to systemic failure with customer standards and economic governance that could necessitate Social Housing Regulator action against OCC. Tenants could potentially take legal action via a class action in reference to various housing statutes in such an extreme scenario. Overall Impact - disruptions in the working	Nerys Parry	2	4	8		
125	Service: Communities & Citizen Services - Leisure contract financial performance - There is ongoing contract management and a partnership approach to the external leisure provision contract, to ensure stability with its financial performance. Causes of issues could include external factors such as pandemics, utility pricing or a bid that was unrealistic.	Financial impact to OCC and or service reduction to cut costs that impact service quality.	Hagan Lewisman	4	4	16		
126	Service: Communities & Citizen Services - Financial savings against community centres - Desired savings may not be achieved, because savings were developed without the input of the service area	Financial impact to OCC and or service reduction to cut costs. Service quality would be impacted.	Hagan Lewisman	4	4	16		

Oxford City Council

Internal Audit Report - Final

Purchase Cards

SEPTEMBER 2025

Design Opinion	● Limited
Design Effectiveness	● Limited



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DISTRIBUTION

Nigel Kennedy	Group Finance Director and s151 Officer
Philip McGaskill	Revenues and Payments Service Delivery Manager
Sue Allen	Payments Team Leader

BDO LLP APPRECIATES THE TIME PROVIDED BY ALL THE INDIVIDUALS INVOLVED IN THIS REVIEW AND WOULD LIKE TO THANK THEM FOR THEIR ASSISTANCE AND COOPERATION.

REPORT STATUS

Auditors:	Gurpreet Dulay - Partner Yasmin Ahmed - Manager Joe Taylor - Assistant Manager
Dates work performed:	May - July 2025, with a closing meeting held on 15 July 2025
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Final report issued:	22 September 2025

Executive summary

CRR REFERENCE: 001 FINANCIAL STABILITY AND 002 OXFORD MODEL

Design Opinion

 Limited

Design Effectiveness

 Limited

Recommendations

 2

 2

 0



SCOPE

Background

- ▶ Oxford City Council (the Council) uses purchase cards for Council related expenditure and the Barclaycard Expense System (BCOS) to review and approve their expense claims and reimbursements. The use of purchase cards and expense claims require oversight and monitoring by management to prevent misuse and ensure compliance with the Council's financial regulations.
- ▶ During a recent Data Analytics audit for 2023-24, some exceptions were found in relation to purchase card transactions. A high priority finding was raised with the Council, whereby management and card holders were not reviewing and approving purchase card transactions promptly, creating a backlog of over two years of purchase card transactions. Improvements have since been made in this area and regular Council monitoring is in place. We have included this area as part of our audit review.
- ▶ There is a regulatory requirement set out in the Local Authorities (Data Transparency) Code 2015, requiring local authorities in England to publish information relating to expenditure over £500. The Council publish a list of payments on the Council website for transactions over the purchase value of £500 made to suppliers as part of their commitment to transparency.
- ▶ In 2025-26 the Council has issued a significant number of purchase cards, particularly in the Housing sector to support with temporary accommodation requests. Therefore, there are concerns by senior management over the consistency of the purchase card approval process and whether purchase cards are used for appropriate Council related activity.
- ▶ The Barclaycard statements have been reviewed from April 2024 to March 2025, and the total expenditure was £1,493,529.42.
- ▶ An audit of Data Analytics at the Council has recently been completed by BDO which included a review of purchase card transactions. A finding from this audit related to purchasing cards and the development of a purchase card policy. This finding was also highlighted in this review, however, has not been included in this report to avoid duplication.

Purpose

- ▶ The purpose of the audit was to provide assurance around the use of purchase cards and expenditure to ensure controls are appropriate.

Areas reviewed

As part of this audit, we reviewed the following areas:

- ▶ Assessed whether purchase card policies and procedures were up-to-date and the appropriateness of the content, including

requesting/issuing, authorisation, and usage of purchase cards along with retention of supporting documentation was in line with Council reporting requirements.

- ▶ Ensured that the record of all purchase cards was in use and that purchase cards had been issued following appropriate request and approvals as per the purchase card policy and procedure.
- ▶ Identified whether cardholders were current employees of the Council, that they held their card securely and that cards were only used by the named cardholder.
- ▶ Reviewed the record of card limits to ensure that card limits were in line with the category of the card and that any changes had been appropriately authorised, with any large value transactions that incur regularly identified.
- ▶ For a sample of purchase cards, we reviewed that all transactions per the card statement agreed to an up-to-date transaction log reviewed and approved by the cardholder and subsequently their manager and this was regularly monitored by the Council's Finance team.
- ▶ For a sample of transactions, we assessed that expenditure was supported by appropriate documentation in line with policy requirements.
- ▶ That the Finance team and the Revenue Service Delivery Manager had appropriate oversight of purchase card activity and retained audit evidence for all expenditure.
- ▶ Following discussions with the Payments Team Leader, purchasing cards in use at OxPlace and ODS have not been included in this review as the Council do not issue or monitor any of their expenditure.



AREAS OF STRENGTH

We have identified the following areas of good practice:

- ▶ The Senior Payments Officer has performed a review of unapproved transactions on the Barclaycard Online System over several years and has reduced the backlog (totalling £145,217.46) by the following amounts:
 - 2022 £0
 - 2023 £20,448.47
 - 2024 £19,045.16.



AREAS OF CONCERN

We found:

- ▶ Purchasing card transactions are not submitted, reviewed and approved in a timely manner (Finding 1 - High).
- ▶ Transactions totalling £145,217.46 made between 2022-2024 have not been submitted and/or approved on the Barclaycard Online System. All of which are currently being followed up by the Senior Payments Officer (Finding 1 - High).
- ▶ From a sample of 20 transactions processed in March 2025, 40% had not been approved online and 20% remain open with no supporting evidence attached (Finding 1 - High).
- ▶ The record of card holders held by the Payments Team is not up to date or comprehensive and therefore cannot be used to perform reviews to identify any leavers who should have returned their card or existing staff who no longer require a card (Finding 2 - High).

- ▶ The existing purchasing card limits are not regularly reviewed for appropriateness and purchasing cards are being used in place of invoicing (Finding 3 - Medium).
- ▶ On occasion purchasing cards are not used solely by the card holder and card details have been shared with colleagues (Finding 4 - Medium).



CONCLUSION

We conclude that the Council has a Moderate design of controls and a Limited effectiveness of control for purchase cards.

Control Design

The control design is Limited as the system of internal control requires strengthening to reduce the identified risks in the management of purchasing card processes at the Council.

In particular, the purchasing card agreement and procedures has not been updated for approximately 10 years and is therefore not reflective of current practice. In addition, there is no review of card limits or the suitability of the nature of purchases. Suitability should be reviewed by the approver, however as described below, the Payments Team have been working on resolving a backlog of non-approved transactions demonstrating the ineffectiveness of the current approval process.

Whilst no instances of leavers still holding a purchase card were identified during the review, it should be noted that there is no process for identifying leavers on the record of card holders. However, there has been a recent introduction of an automatic notification received by the Payments Team prompted by the completion of the leaver's checklist if the employee holds a purchasing card. This will assist in enabling the record of card holders to be kept up to date.

Control Effectiveness

The control effectiveness is also Limited as there is evidence of non-compliance with controls, that may result in the risk of financial loss materialising.


Instances of transactions not being submitted, supported by receipts and approved in a timely and comprehensive manner on the Barclaycard Online System have been identified which could potentially result in fraudulent payments not being detected. We have been unable to determine whether any inappropriate/fraudulent purchases have been made due to the lack of consistent approval and supporting documentation.

Also highlighted during the review, was two instances of card details being shared with colleagues. This is a breach of the card holder agreement and increases the risk of inappropriate use.

We do, however, recognise the efforts made by the Payments Team to manage the purchasing card process and the plans in place to improve existing controls.

Detailed findings

1. PURCHASING CARD TRANSACTIONS ARE NOT SUBMITTED, REVIEWED AND APPROVED IN A TIMELY MANNER AND SUPPORTING DOCUMENTATION IS NOT UPLOADED TO THE BARCLAYCARD ONLINE SYSTEM

TOR Risk:	There is no monitoring of purchase card expenditure to ensure that all transactions are appropriate and in line with policy, resulting in potential financial loss or fraudulent activity
Significance	 High



FINDING

All purchases are entered onto the Barclaycard Online System (BCOS) by the card holder and should be authorised by the nominated approver on a regular basis. However, there have been issues with transactions not being entered correctly by card holders and not being approved. The Senior Payments Officer has been working through all outstanding payments over the course of the last 6 months by contacting card holders and approvers to ensure they fulfil their roles. This has been a resource heavy task and is still in progress.

For context, the records have been provided for 2022, 2023 and 2024. As of 3 June 2025, the following amounts were in the process of being investigated and approved:

- ▶ 2022 £4,797.65
- ▶ 2023 £34,792.30
- ▶ 2024 £105,627.51.

This totals £145,217.46 of payments not correctly processed and approved since 2022.

Not approving transactions in a timely manner has resulted in a high volume of resource from the Payments Team required to investigate outstanding transactions over the past 3 years. All cardholders are required to sign up to the agreement which states that they will be responsible for the timely reconciliation of the monthly purchasing card statement through the BCOS system and failure to manage transactions in a timely manner will result in the card being blocked or cancelled.

The agreement also states that copies of all invoices and receipts for a transaction must be uploaded to BCOS. The receipt is then available for review by the approver prior to authorisation.

A sample has been reviewed from the Barclaycard statement dated March 2025. There were 533 transactions which equals a daily control frequency, assessed as high risk due to the lack of controls currently in place for the usage of purchasing cards. Therefore, a sample of 20 was selected to verify that each transaction has been recorded on BCOS and was reviewed and approved.

Out of 20 transactions:

- ▶ 20 have been recorded on BCOS. Four (20% of the sample) remain with an open status and have not yet been submitted, despite the date of the transactions being 06/20/23 March. They have therefore not been approved prior to the monthly reimbursement by the Council
- ▶ 12 have been reviewed and approved on BCOS by the card approver. The remaining eight (40%) have not been approved
- ▶ Five (25%) do not have appropriate supporting documentation uploaded to BCOS. Four of these are open transactions, therefore there is the opportunity for the user to upload a receipt prior to their submission of the transaction. However, given that the

transactions all occurred over three months ago, receipts have not been attached in a timely manner ready for what should be a monthly review and approval.

The five transactions without a receipt range from £288 to £1,220, totalling £3,205.36 and are for social media advertising, an office chair, the Royal Town Planning Institute, a car battery and app building software.

The likelihood of the purchasing cards being used fraudulently increases without review and approval of each transaction.

Without supporting documentation, it is not possible for a reviewer to verify the purpose of the transaction and for the Council to process the potential VAT claim on the purchase.



RECOMMENDATION

- A. To prevent further instances of transactions not being approved on BCOS, a policy should be produced to clearly stipulate the consequences of not recording and approving transactions in a timely manner. The policy should be presented at Senior Management meetings and then circulated to all card holders and approvers to raise awareness and ensure the support of Senior Management if the consequences need to be actioned.
- B. All transactions should be supported by the relevant documentation and submitted on BCOS before the next monthly reconciliation is due. This should be reiterated to cardholders and approvers including the consequences of non-compliance. Details of any VAT paid on each purchase should be evidenced by the supporting documentation where relevant. This allows timely and accurate approval to be granted, including the appropriate VAT reclaim, and will help to prevent a backlog in transactions without approval.
- C. Following the review of the backlog of previously unapproved transactions, an assessment should be performed of spend which is deemed inappropriate and a list of ineligible items should be included in the purchase card policy.




MANAGEMENT RESPONSE

- A. To prevent further instances of transactions not being approved on BCOS, a formal policy has been developed to clearly outline the responsibilities of cardholders and approvers, as well as the consequences of failing to record and approve transactions in a timely manner. This policy has been presented at Senior Management meetings to ensure visibility and support at the highest level. It has also been circulated to all card users and their approvers. As part of the implementation, all relevant officers are required to confirm in writing that they have read and understood the policy. The policy explicitly states the consequences of non-compliance, ensuring that expectations are clear, and that appropriate action can be taken when necessary. A revised credit card application form was sent to all current credit card holders. They have all signed up to the conditions contained within the document and returned the card application form.
- B. Have fully complied with the requirements outlined in points B and C. All managers have been advised of their responsibilities regarding timely submission and documentation of transactions on BCOS. Monthly checks will be carried out to monitor compliance, and any necessary corrective actions will be enforced promptly.
- C. Additionally, the review of transactions has been completed, and no inappropriate spend has been identified.

Responsible Officer:	Phil McGaskill, Revenues and Payments Service Delivery Manager
Implementation Date:	31 December 2025 (design of controls has been implemented, however, to judge the effectiveness this will take through to the end of the calendar year)

2. THE RECORD OF CARD HOLDERS DOES NOT CAPTURE ADEQUATE DETAILS AND IS NOT UP TO DATE TO ALLOW FOR IDENTIFICATION OF LEAVERS AND CARDS NO LONGER REQUIRED

TOR Risk:	There are insufficient security controls in place resulting in the cards being incorrectly issued and used by non-authorised personnel.
Significance	 High



FINDING

Council procedure is for purchase cards to be issued to card holders following an email request received from their manager. An official Barclaycard application form is completed by the prospective card holders' manager and then forwarded to the Head of Financial Services for approval. Once authorisation is granted, the form is forwarded onto Barclaycard.

The Barclaycard form only requires information, which is required by the bank, such as account number, business address, expenditure limits, card holder name and address, signature of employee authorised to request cards and signature of the Head of Financial Services.

There is no separate Council application form to record additional details such as the department/team who require the card, an outline of what the card is required for and the approver. If requested, this information could then be recorded on the card holder master record and used to identify areas where there is an excess of cards to potentially reduce the number of cards in issue.

The request and issue of cards is not documented as a procedure (refer to finding 3).

A master record of card holders is maintained by the Payments team on an excel spreadsheet. There are 131 current cardholders listed. The spreadsheet also includes tabs for leavers, authentication card holders, inactive/cancelled and those which were moved to Oxford Direct Services (a wholly-owned Council company) and later destroyed, with Oxford District Services issuing their own cards.

The Payments Team Leader has acknowledged that the record is not up to date and is aware that it requires a full review of format and content.

Currently there is only one name on the authentication card holders tab with no further details recorded. An authentication card holder cannot make purchases (the card has been issued to them to use as a tool for logging onto BCOS for administration purposes). For example, the Payments Team Leader is an authentication card holder to allow for monitoring and review of payments.

A sample of 10 current card holders were selected (from the master record of cardholders) as it is a periodic control frequency (131 - the number of cardholders) and is assessed as high risk due the lack of current controls in place and the inherent risk of fraud. The Barclaycard application form for each of the sample has been requested, to verify the process followed for the request and the approval given.

Out of 10 cardholders selected from the record held, only eight application forms were provided (the remaining two are historic and no forms could be provided). Six of the forms were fully completed with appropriate approval, however two of the forms had not been approved (one of which has no expenditure limit for the card recorded). It has been noted that Barclaycard do not process applications without the nominated approval, therefore although not documented on the forms, approval would have been provided via email, but evidence of this could not be found during the audit.

Not having an up-to-date record of card holders across the Council increases the risk of fraudulent activity due to the Payments team not being aware of leavers who may still hold their card and potentially make purchases. In addition, not having the full details of each card holder and what the card is to be used for, increases the risk of excess cards being issued where not required or being used for inappropriate purchases.



RECOMMENDATION

- A. An application form for requesting a purchasing card should be produced by the Payments Team to ensure they are consistently receiving the required information for each request. This is in addition to the Barclaycard application form but should not be a duplicate of it. The information from the form should be recorded on the card holder record and should be used to perform regular reviews of the use and distribution of cards across the Council. The Council application form should be attached to the Barclaycard form and submitted to the Head of Financial Services for oversight and information to consider prior to his approval. The Council application form should be approved by the Line Manager and card holder. The Barclaycard application form should be signed by the cardholder; employee authorised to nominate cardholders and the Group Finance Director.
- B. A full review of the list of cardholders and approvers should be performed to remove any who no longer work at the Council and to cancel their card and/or approval permissions with immediate effect.
- C. Following the review and update of card holders, the record should be reformatted to allow clarity and ease of use and should be kept up to date. The record should include (but not limited to):
 - ▶ Full name
 - ▶ Job title
 - ▶ Department
 - ▶ Line manager/Approving manager
 - ▶ Reason for requiring a card
 - ▶ Date purchasing card issued
 - ▶ Date for review of future requirement for card
 - ▶ Card limit
 - ▶ Individual purchase limit.



MANAGEMENT RESPONSE


The Council have implemented the recommendations outlined in points A, B, and C.

- A. A Council-specific purchasing card application form has been created and is now used alongside the Barclaycard form, with appropriate approvals in place.
- B. A full review of cardholders and approvers has been completed, with the outdated records removed.

- C. The cardholder register has been reformatted in the manner recommended for clarity and now includes all the details required in the report. It is now actively maintained to ensure accuracy.

Responsible Officer:	Phil McGaskill, Revenues and Payments Service Delivery Manager
Implementation Date:	31 December 2025 (design of controls has been implemented, however, to judge the effectiveness this will take through to the end of the calendar year)

3. PURCHASING CARD LIMITS ARE NOT REVIEWED FOR APPROPRIATENESS AND PURCHASING CARDS ARE BEING USED IN PLACE OF INVOICING

TOR Risk:	Expenditure using purchase cards is not appropriate, justified and authorised resulting in potential financial loss or fraudulent activity
Significance	 Medium



FINDING

The card expenditure limit required for each card is recorded on the Barclaycard application form which is authorised by the Head of Financial Services. The limits are also recorded on the list of cardholders maintained by the Payments Team.

The Management Accountancy Manager completes the application form and decides on the limit required following discussions with the team manager of the area requiring the card, considering the business need.

All cards held are Barclaycard credit cards and the limits range from £500 to £35,000 (with limits for individual transactions ranging from £500 to £10,000). There are five cards held with a £35,000 limit and one with a £25,000 limit (each of these six cards with an individual transaction limit of £1,000). All these cards in use relate to Housing Services, due to the requirement to house people in hotels when other suitable accommodation is not available. The Payments Team Leader has acknowledged that these limits are high and a review of the need for this value should take place.

Changes to card limits do not occur on a regular basis but when required, a manager contacts the Payments Team Leader with the request and the reasoning behind it. There have been two instances in 2024/25, and the email requests have been reviewed:

- ▶ Email received by the Payments Team Leader on the 25 March 2025 from the Senior Temporary Accommodation Officer to increase a colleague's card limit to £8,000 to cover several temporary accommodation bills which required payment. The Officer authorising the increase was not the approver for the same card, as recorded on the list of card holders.
- ▶ Email received by the Payments Team Leader on the 27 March 2025 from the Community Facilities Operations Manager to increase her card limit as it was being declined and further expenditure was required. The Line Manager confirmed they were happy with the request. The Officer authorising the increase was not the approver for the same card, as recorded on the list of card holders.

The recommendation in Finding 3 includes the identification of specific officers who can approve limit increases to be clearly recorded in the updated procedures.

The Barclaycard statements have been reviewed from April 2024 to March 2025, and the total expenditure was £1,493,529.42.

It was identified that a number of payments are being made to suppliers with whom a business account could be set up and/or payments made via invoice, including but not limited to Screwfix, Travis Perkins, Premier Inn, carpet suppliers, Amazon, Thames Water and other utility companies.

There are several risks associated with paying by credit card rather than invoice:

- ▶ **Limited Control:** Credit card payments can be made quickly, which might lead to less oversight and control over spending. This can result in unauthorised or impulsive purchases if not monitored closely.
- ▶ **Record-Keeping Challenges:** Credit card statements may not provide detailed information about each transaction, making it harder to track spending accurately and complicating budgeting and financial planning.
- ▶ **Cash Flow Impact:** Credit card payments are immediate, which can affect cash flow management. Without the ability to plan payments according to financial cycles, there might be unexpected financial strain.
- ▶ **Increased Fraud Risk:** Credit cards are more susceptible to fraud and unauthorised transactions. Without robust security measures, there's a higher risk of fraudulent activity.
- ▶ **Additional Costs:** Credit card payments can incur fees and interest charges, which can add up over time and increase overall costs for the authority.



RECOMMENDATION

- A. A review should be performed of purchasing card limits to ensure that where they can be reduced, action is taken, and limits are set at a reasonable level. Having only the required limit on purchasing cards reduces the risk of potential fraudulent payments being made.
- B. A review of suppliers who are paid regularly should be performed by the Management Accounting Team, to determine where it would be advantageous to establish business accounts and invoicing for future transactions. This strategy will help reduce the volume of purchasing card transactions, ease the workload for approvers, and decrease the time the Payments Team spends monitoring transactions. Implementing this recommendation will contribute to more efficient financial management within the Council.



MANAGEMENT RESPONSE

- A. Have complied with the recommendation to review purchasing card limits. A bi-annual review process is now in place to ensure limits are set at appropriate levels and reduced where possible. This will mitigate the risk of potential fraudulent payments and ensures card limits remain proportionate to operational needs.
- B. In response to this recommendation, the process for uploading the monthly Purchasing Card transactions from BCOS to the Council's financial system has been reviewed and enhanced to include an analysis of transactions by Merchant. This analysis will be reviewed by a Finance Business Partner and/or the Strategic Finance Manager who will recommend to the Procurement and Payments Teams any Merchants for which a business account with the Council should be sought to enable future transactions to be invoiced with their approval and payment captured through the P2P processes.

Responsible Officer:

Phil McGaskill, Revenues and Payments Service Delivery Manager

Implementation Date:

31 December 2025 (design of controls has been implemented, however, to judge the effectiveness this will take through to the end of the calendar year)

4. PURCHASING CARDS ARE NOT USED SOLELY BY THE CARD HOLDER AND CARD DETAILS HAVE BEEN SHARED WITH COLLEAGUES

TOR Risk:

There are insufficient security controls in place resulting in the cards being incorrectly issued and used by non-authorised personnel

Significance

Medium

**FINDING**

When staff at the Council are issued with a Purchasing Card, they are required to sign the purchasing card procedures and agreement which stipulates:

- ▶ You must sign your card upon receipt, keep the card secure and ensure you take reasonable steps to ensure its safety and never reveal the PIN
- ▶ You must not disclose your card details to anyone other than when conducting a transaction
- ▶ The card is for your use only, for work related purchases.

When an employee leaves, the manager completes a leavers form on the HR system. A recent addition has been made to the form, 'Does the employee have a company purchase card?', if yes is selected from the drop-down menu, an automated email is received by the Payments Team stating that the card needs to be recovered and any payment records updated.

As part of our testing, we issued a questionnaire to a sample of 10 card holders taken from the master record to request responses to the following questions:

- ▶ Do you hold a Council purchasing card?
- ▶ Where do you keep the card?
- ▶ Do you share the card/card details with colleagues?
- ▶ Do you keep a log (separate to BCOS) of all purchases made using the card?
- ▶ How often do you enter purchases onto BCOS?

Seven responses were received:

- ▶ All card holders hold the card on their person or at home on their desk/drawer
- ▶ One of the cardholders has responded yes to having shared card details with colleagues and another has shared card details with their line manager
- ▶ The response to how often purchases are entered onto BCOS varied from weekly to quarterly, with the majority recording monthly.

Upon issue of the form to the sample, an email was received back from a card holder stating that although they are the named card holder, it is in possession of their colleague. This highlights the lack of knowledge held by cardholders that the card should be used only by themselves, in compliance with the card holder agreement.

Using a purchasing card without being the card holder, can pose several risks:

- ▶ **Accountability:** The card holder is responsible for all transactions made with their card. if someone else uses it, it can complicate tracking and accountability, making it difficult to resolve any discrepancies
- ▶ **Security:** Sharing of card details can compromise security. it increases the risk of unauthorised access and potential misuse of funds
- ▶ **Policy violation:** Using a card without being the card holder is in breach of the purchasing card procedures and agreement.



RECOMMENDATION

- A. Purchasing cards should only be used by the named card holder and card details should not be shared. If there are changes to structure and/or roles within teams, and the card holder is no longer the correct person, it should be changed following a defined process via discussions with the Payments Team, the Head of Financial Services and Barclaycard. The process should be documented including the approval required and all evidence of the change retained.



MANAGEMENT RESPONSE

- A. To prevent further instances of misuse of credit cards by sharing the card details with colleagues, a formal policy has been developed which prohibits card sharing, clearly outlining the responsibilities of cardholders and approvers, as well as the consequences of failing to comply with those requirements. The revised credit card application form was sent to all current credit card holders. They have all signed up to the conditions contained within the document and returned the card application form.

Responsible Officer:

Phil McGaskill, Revenues and Payments Service Delivery Manager

Implementation Date:

31 December 2025 (design of controls has been implemented, however, to judge the effectiveness this will take through to the end of the calendar year)

OBSERVATIONS

LACK OF GUIDANCE ON ELIGIBLE AND INELIGIBLE TYPES OF SPEND

During the review, it was identified that the current Purchasing Card Agreement and Procedures have not been updated for approximately 10 years. The existing agreement and procedures have been reviewed and although it is stated that the cards are for work related purchases only and must not be used where there is a corporate contract in place, there is no further detail on types of ineligible spend. While we understand that it is not possible to document a list of all eligible types of spend, it would be beneficial to list definite types of illegible spend to increase cardholders' awareness.

Appendix I - Definitions

LEVEL OF ASSURANCE	DESIGN OF INTERNAL CONTROL FRAMEWORK		OPERATIONAL EFFECTIVENESS OF CONTROLS	
	FINDINGS FROM REVIEW	DESIGN OPINION	FINDINGS FROM REVIEW	EFFECTIVENESS OPINION
Substantial	Appropriate procedures and controls in place to mitigate the key risks.	There is a sound system of internal control designed to achieve system objectives.	No, or only minor, exceptions found in testing of the procedures and controls.	The controls that are in place are being consistently applied.
Moderate	In the main there are appropriate procedures and controls in place to mitigate the key risks reviewed albeit with some that are not fully effective.	Generally a sound system of internal control designed to achieve system objectives with some exceptions.	A small number of exceptions found in testing of the procedures and controls.	Evidence of non compliance with some controls, that may put some of the system objectives at risk.
Limited	A number of significant gaps identified in the procedures and controls in key areas. Where practical, efforts should be made to address in-year.	System of internal controls is weakened with system objectives at risk of not being achieved.	A number of reoccurring exceptions found in testing of the procedures and controls. Where practical, efforts should be made to address in-year.	Non-compliance with key procedures and controls places the system objectives at risk.
No	For all risk areas there are significant gaps in the procedures and controls. Failure to address in-year affects the quality of the organisation's overall internal control framework.	Poor system of internal control.	Due to absence of effective controls and procedures, no reliance can be placed on their operation. Failure to address in-year affects the quality of the organisation's overall internal control framework.	Non compliance and/or compliance with inadequate controls.

RECOMMENDATION SIGNIFICANCE

High	A weakness where there is substantial risk of loss, fraud, impropriety, poor value for money, or failure to achieve organisational objectives. Such risk could lead to an adverse impact on the business. Remedial action must be taken urgently.
Medium	A weakness in control which, although not fundamental, relates to shortcomings which expose individual business systems to a less immediate level of threatening risk or poor value for money. Such a risk could impact on operational objectives and should be of concern to senior management and requires prompt specific action.

Low

Areas that individually have no significant impact, but where management would benefit from improved controls and/or have the opportunity to achieve greater effectiveness and/or efficiency.

Appendix II - Terms of Reference

**KEY RISKS**

Based upon the risk assessment undertaken during the development of the internal audit operational plan, through discussions with management, and our collective audit knowledge and understanding the potential key risks associated with the area under review are:

- ▶ Risk 1: There are no policies or procedures in place to govern the usage of purchase cards therefore staff are not aware of what constitutes appropriate usage of these.
- ▶ Risk 2: There are insufficient security controls in place resulting in the cards being incorrectly issued and used by non-authorised personnel.
- ▶ Risk 3: Expenditure using purchase cards is not appropriate, justified and authorised resulting in potential financial loss or fraudulent activity.
- ▶ Risk 4: There is no monitoring of purchase card expenditure to ensure that all transactions are appropriate and in line with policy, resulting in potential financial loss or fraudulent activity.

**SCOPE & APPROACH**

The following areas will be covered as part of this review:

- ▶ Risk 1. We will review if a purchase card policy and procedure is in place and its content is appropriate and up to date, including requesting/issuing, authorisation, and usage of purchase cards along with retention of supporting documentation for example receipts in line with Council reporting requirements.
- ▶ Risk 2. We will confirm that an up-to-date listing of all purchase cards in use is in place and confirm that these have been issued following appropriate request and approvals as per the purchase card policy and procedure documents.
- ▶ Risk 2. We will verify that all cardholders are current substantive employees of the Council and confirm for a sample of purchase cardholders, that the card is in their possession and there are arrangements made by the Council to verify that the purchase card is used solely by the card holder.
- ▶ Risk 3. We will confirm that all card limits are in line with the category of the card and that any changes have been appropriately authorised and identify large value transactions that incur regularly.
- ▶ Risk 4. We will confirm for a sample of purchase cards, that all transactions per the card statement agree to an up-to-date transaction log which is reviewed and approved by the cardholder's and subsequently their manager and this is regularly monitored by the Council's Finance team.
- ▶ Risk 4. We will review for a sample of transactions that expenditure is supported by appropriate documentation in line with policy requirements.
- ▶ Risk 4. We will confirm that the Finance team and the Revenue Service Delivery Manager has appropriate oversight of purchase card activity and retains audit evidence for all expenditure.

Appendix III - Responsibilities and conformance

Management responsibilities

The Global Internal Audit Standards (GIAS) refer to the ‘board’ as ‘the highest-level body charged with governance, such as a board of directors, an Audit Committee, a board of governors or trustees, or a group of elected officials or political appointees.’ For the Council, ‘the board’ is the Audit and Governance Committee (AGC) acting on behalf of the Council.

The AGC is responsible for determining the scope of internal audit work, and for deciding the action to be taken on the outcome of our findings from our work.

The AGC is responsible for ensuring the internal audit function has:

- ▶ The support of the Council’s management team.
- ▶ Direct access and freedom to report to senior management, including the Chair of the AGC.
- ▶ The AGC is responsible for the establishment and proper operation of a system of internal control, including proper accounting records and other management information suitable for running the Council.

Internal controls covers the whole system of controls, financial and otherwise, established by the Council to carry on the business of the Council in an orderly and efficient manner, ensure adherence to management policies, safeguard the assets and secure as far as possible the completeness and accuracy of the records. The individual components of an internal control system are known as ‘controls’ or ‘internal controls’. The AGC is responsible for risk management in the organisation, and for deciding the action to be taken on the outcome of any findings from our work. The identification of risks and the strategies put in place to deal with identified risks remain the sole responsibility of the Council.

Limitations

The scope of the review is limited to the areas documented under Appendix II - Terms of reference. All other areas are considered outside of the scope of this review. Our work is inherently limited by the honest representation of those interviewed as part of the review. Our work and conclusion is subject to sampling risk, which means that our work may not be representative of the full population.

Internal control systems, no matter how well designed and operated, are affected by inherent limitations. These include the possibility of poor judgment in decision-making, human error, control processes being deliberately circumvented by employees and others, management overriding controls and the occurrence of unforeseeable circumstances.

Our assessment of controls is for the period specified only. Historic evaluation of effectiveness may not be relevant to future periods due to the risk that: the design of controls may become inadequate because of changes in operating environment, law, regulation or other; or the degree of compliance with policies and procedures may deteriorate.

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This engagement has been conducted in accordance with Global Internal Audit Standards in the UK Public Sector, which encompass:

- ▶ The global Institute of Internal Auditors (IIA) *Global Internal Audit Standards* effective from January 2025
- ▶ The Internal Audit Standards Advisory Board (IASAB) *Application Note Global Internal Audit Standards in the UK Public Sector* effective from 1 April 2025.

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The matters raised in this report are only those which came to our attention during our audit and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. The report has been prepared solely for the management of the organisation and should not be quoted in whole or in part without our prior written consent. BDO LLP neither owes nor accepts any duty to any third party whether in contract or in tort and shall not be liable, in respect of any loss, damage or expense which is caused by their reliance on this report.

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