

Appendix 2

Risk Register

Ref	Risk Title	Risk Description	Risk Cause	Risk Consequence	Name of Risk Owner	Gross			Current			Target		Risk Control/Mitigation Description	Risk Control Date Due	Progress on Risk Control/Mitigation	Action Owner
						P	I	Score	P	I	Score	P	I				
APPS_001	Non-compliance with statutory publication and approval	Annual Pay Policy Statement not approved by Full Council and/or not published by 1 April as required	Governance delays, timetable slippage, or omission in web publication process	Breach of Localism Act requirements; adverse external audit comment; reputational damage	Gail Malkin	3	4	12	2	4	8	1	3	Legal, Monitoring Officer and S151 review; schedule Council decision on Forward Plan; create pre-publication checklist; prepare document for publication and schedule with Web Team for publishing on approval day	31/03/2026	Draft statement prepared; timetable drafted; approvals scheduled	Steph Nichols
APPS_002	Data accuracy and transparency errors	Incorrect figures published (e.g., pay multiple, Oxford Living Wage rate, allowances)	Manual error, late data updates, misinterpretation of definitions	Public challenge/FOIs; need for correction; reputational harm	Gail Malkin	3	3	9	2	3	6	1	2	Dual verification with Finance/Payroll; cross-check against approved pay scales and published OLV; sign-off by S151 and Monitoring Officer prior to going to Council and publication.	31/03/2026	Data sources identified; validation checklist drafted	Steph Nichols
APPS_003	Employee relations and engagement	Negative reaction to elements reported in the Annual Pay Policy Statement (e.g., pay multiple, market allowance narrative, senior pay disclosures) affects	Insufficient communication or lack of advance stakeholder briefing on figures or narrative included in the APPS.	Reputational risk, challenge from unions or internal stakeholders, delays to approval, or increased scrutiny at committees.	Gail Malkin	3	3	9	1	3	3	1	2	Early engagement with Trade Unions and key Managers; Consultation with Union members; ensure intranet guidance and information is up to date; ensure timely communication and messaging to employees	31/03/2026	Trade Union agreement obtained; Union members consulted on new pay deal; Employees notified about new pay deal via Intranet news article	People Team
APPS_004	Equalities and equal pay compliance	Pay arrangements create or perpetuate inequities (gender/ethnicity/disability) or equal pay challenges	Inconsistent application of job evaluation process; insufficient monitoring	Legal challenge, cost exposure, reputational harm	Gail Malkin	3	4	12	2	3	6	1	2	Undertake Equality Impact Assessments for change elements as required, maintain robust analytical job evaluation; publish pay gap data; legal review as required.	30/06/2026	EqIA completed as part of Pay Project to cover change elements; pay gap data published, JE governance embedded	Steph Nichols
APPS_005	Governance for senior pay and severance	Non-compliance with approvals for senior appointments (>£100k) and severance thresholds	Process oversight or urgent cases bypassing standard routes	Decision challenge; requirement to retrospectively correct; reputational impact	Gail Malkin	2	4	8	2	3	6	1	2	Embed governance checks in recruitment/exit workflows; Senior Officer gatekeeping; review; maintain decision audit trail	Ongoing	Governance checks in recruitment workflow	People Team
APPS_006	Market allowance review impact	Outcome of bi-annual market allowance review (due by 31 March 2027) leads to adjustments that affect retention or affordability	Market changes, inconsistent application, or delays to review	Turnover in hard to fill roles or increased cost pressure	Gail Malkin	3	3	9	3	3	9	2	2	Define clear and concise methodology; engage with services and unions throughout the review; consult with impacted staff; develop and implement comms plan; provide retention actions; agree review schedule and sign-off timeline.	31/03/2027		Steph Nichols
APPS_007	Publication failure (web/data)	Website or process failure prevents timely publication of Pay Policy Statement	Resource constraints or technical issue in Web/Comms team	Late publication causing non-compliance and reputational impact	Gail Malkin	2	3	6	2	2	4	1	2	Schedule in for publication in advance; pre-prepare webpage content; ensure have a primary and secondary contact for publication	31/03/2026	Draft copy prepared (Appendix 1 to Council Report)	Steph Nichols
APPS_008	Pay multiple variance and optics	Significant change in pay multiple from recruitment, restructure or workforce shifts draws negative attention	Changes in senior pay or workforce composition alter the calculated pay multiple.	Media scrutiny; reputational impact; challenge from Stakeholders, pressure for policy change	Gail Malkin	2	3	6	2	2	4	1	2	Monitor pay multiple calculations; ensure decisions align with governance groups before sign off.	Ongoing	Baseline calculated; comms lines drafted	People Team

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