

Risk Register

Housing & Housing Asset Management Procurement Project

3/6/2026

277

Ref	Description	Consequence	Name of Risk Owner	Gross			Current			Target			Control/Mitigation Description	Control Date Due	Progress on Control/Mitigation	Action Owner
				P	I	Score	P	I	Score	P	I	Score				
1	Risk of data breach, corruption, or loss during migration of large volumes of sensitive tenancy, asset, and compliance data	GDPR breach, ICO enforcement, service disruption, reputational harm, risks to vulnerable residents.	Bill Graves	4	5	20	4	5	20	3	3	9	Robust data-migration plan; appointment of a test plan manager; secure cloud hosting & cyber security standards; contract requirements & full testing cycles	10/1/2026	1) Cyber security elements to be developed as part of the tender & contract. 2) Appointment of test plan manager and the Data migration plan to be developed after contract award.	Bill Graves
2	Actual market pricing unknown until tenders received.	Risk of costs exceeding approved budget.	Bill Graves	3	3	9	3	3	9	2	2	4	Significant capital allocation for 2026/27 and tender responses received before MTFP window. Contract controls on price changes. Procurement process to seek VFM	10/1/2026	Consultant procured to assess business requirements and develop specification ahead of procurement and award.	Bill Graves
3	Insufficient capacity may slow specification, procurement and mobilisation work.	Project delays, reduced quality of requirements, weak implementation oversight	Bill Graves	4	5	20	2	2	4	2	3	6	Clear governance via oversight board; consultant support procured; backfill internal project team with temporary staff.	10/1/2026	1) Consultant procured. 2) Governance Board in place. 3) Project team requirements to be identified and appointed before tender award	Bill Graves
4	Existing supplier may have limited capacity or willingness to support complex data extraction and transition	Delayed data access, increased cost, migration quality risks	Bill Graves	2	5	10	2	3	6	2	3	6	Ongoing relationships with supplier; contractual obligation on existing supplier to provide a Handover Plan and cooperate.	10/1/2026	1) Current contract sets out termination and handover procedures. 2) Data extraction requirements to be included in tender	Bill Graves
5	LGR requirement for Section 24 consent and governance changes may affect procurement timing or contract	Delay to contract award; risk of non-compliance with central govt guidance; additional sign-off steps.	Bill Graves	3	4	12	3	3	9	3	3	9	Procurement justified as "continuity of essential services" and is consistent with LGR guidance. Legal support through the procurement process and contract to include scalability and break clauses	9/1/2026	Issue has been flagged as needing consultation following the LGR announcement in July	Bill Graves
6	Failure to deliver the new system before Feb 2028	Failure of statutory landlord functions (rent, repairs, H&S compliance), regulatory breach	Bill Graves	4	5	20	3	5	15	2	5	10	Start procurement activity immediately with a detailed implementation timeline and milestones. Strong project governance with early data and migration planning once tender is awarded.	10/1/2026	Consultant procured to assess business requirements, carry out soft market testing and develop specification ahead of procurement and award.	Bill Graves
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Description of the headings within the risk log

Reference: A reference number to identify the risk.

Description: The situation or event that the recommendations to Cabinet, or the information in the report, expose the Council to.

Consequence: The likely outcomes or consequences if the risk materialises.

Name of the risk owner: The name of the person who is responsible for the risk

Control/mitigation: How the Council is choosing to respond to the risk. What is it doing to reduce probability and/or impact, or what will it do to reduce it, so that it is within the Council's risk appetite?

Control due date: The date by which the control/mitigation should be in place.

Progress on control/mitigation: A description of the progress that has been made in implementing the risk control/mitigation.

Action Owner: The person who is responsible for implementing the risk control/mitigation.

Risk Appetite

The Council's risk appetite is the amount of risk that it is willing to take to achieve its priorities, provide services as planned and deliver its statutory services. When considering risk staff must take into account the Council's appetite for risk which differs according to the type of risk. How low, medium and high are defined is shown at the bottom of the page.

- **Strategic**

3.2 Where the council needs to innovate to make transformative so that it can achieve its 2024 to 2028 priorities, the council has a medium risk appetite. Examples of this might be housing and climate change initiatives where projects might be supported to be innovative, have a degree of uncertainty but are aligned with council priorities.

- **Economic, finance and markets**

3.3 It is a legal requirement for the Council to set a balanced budget which operates against a challenging economic and financial backdrop. The Council only knows what resources it will have for one year at a time and must maintain financial reserves and must be sustainable in the long term as considered by the Group Finance Director on an annual budgetary context of a medium risk appetite. Where there is the possibility to achieve a priority through development or economic growth, the risk will tend towards medium risk, whilst maintaining rigorous service delivery.

- **Customers and Citizens - Providing services as planned and statutory duties**

3.4 For core services that are delivered to vulnerable people the Council has a low-risk appetite to avoid a failure in service delivery that impacts vulnerable people.

- **Reputation**

3.5 The Council must maintain the trust of citizens and consequently has a low risk appetite.

- **IT and information**

3.6 Information Technology plays a critical role in the delivery of including to the most vulnerable in the city and consequently a low-risk appetite to failure of systems. The Council will procure correct IT systems, which are dependable and will provide a service, whilst at the same time are secure and provide data in order that all GDPR requirements are met. The risk appetite is medium if digital transformation projects are undertaken in line with priorities but only after rigorous risk assessment, with continuity of the continuity of service.

- **Legal, regulatory and compliance, both internal and external**

3.7 These risks are about ensuring the Council complies with internal policies, regulatory requirements, legal obligations and standards. The Council will take a risk-based approach where there are risks although they may be in compliance with these areas, could be challenged or subject to regulatory action. The Council has a policy relating to compliance, ensuring all obligations and requirements are met, whilst taking decisions and delivering its services and products. However, in relation to the risk of legal challenge (both defence and prosecution) the Council will have a medium risk appetite. Decisions are taken and legal action will be taken in light of many considerations, including resources, commercial factors, timing, future impact and risk.

- **Organisational, management and people (including health and equalities)**

3.8 Organisational and management risk is about the structure, governance, processes, and culture of the Council. These risks to the delivery of services, cause inefficiencies and damage the Council. The Council's risk appetite is low.

People risk concerns staff and includes recruitment and retention, engagement, training, health and safety and equalities. Risk is being able to obtain the right staff or retain them, a lack of staff or low morale. These can severely impact delivery of services.

low morale. These can severely impact delivery of services if morale is low.

The Council is committed to the health and safety of its staff and the public, not only because it fulfils its legal responsibilities but also has a moral duty not to cause harm. The Council has a low risk appetite and will have effective health and safety practices that help prevent accidents and illness.

The Council is committed to building a fairer city by ensuring that public investments, and policymaking addresses Oxford's social inequalities. A medium risk appetite is appropriate when the benefits of positive change.

- **Environmental and sustainability**

3.9 The Council will have a low-risk appetite for environmental risks that might damage health and wellbeing in the community. Environmental risks might result in legal liabilities and fines. This includes areas such as environmental damage like climate change impacts, pollution and biodiversity. Laws and regulations must be adhered to. A medium risk appetite is acceptable when environmental and sustainability risks result in long term benefits to the city through Zero Carbon Oxford.

- **Commercial**

3.10 The Council is responsible for spending public funds, providing services over the long term, and maintaining the trust of the public. Expenditure with some commercial aspects will be made through return on investment so that these resources can be used to fund other priorities, deliver services as planned and meet its statutory obligations. The investments should align with the priorities of the Council and focus on stable returns.

- **Political**

3.11 Political risk is about change, instability or disagreements that make the delivery of the Council's priorities more difficult. This may include national leadership priorities and resource allocation, shifts in public opinion, outside pressures. Generally, the Council's risk appetite is low.

...processes. Generally, the Council's risk appetite is that an unexpected change can impact service delivery, but it may be that the pursuit of priorities requires working within a changing political environment.

- **Partnerships**

3.12 Partnerships are important because they enable the Council to access additional resources and expertise that can drive change and innovation, leading to the more efficient delivery of priorities and service improvements. Potential benefits, including improved service delivery, while realising efficiencies and savings, the Council will have a medium risk. This risk must be underpinned by sound governance structures.

- **Technical, operational and infrastructure**

3.13 Technical risks are about the adoption of new ways of completing tasks and the reliability of existing methods. The risks include implementation of working and it fails to deliver the expected results. Operational risks arise from the day-to-day activities of the Council and might include inefficiencies or a failure in supply chains. Infrastructure risks relate to physical assets that the Council needs to deliver its services, such as buildings and utilities. In these areas the council has a low risk. It must reliably deliver services to citizens.

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Low	The Council is unwilling to expose itself to risks, particularly if doing so there could be significant negative consequences and the possibility of failure. It will minimise its exposure to risk and prioritise certainty, security, adherence to regulations, and prudence. Key aspects of a low-risk appetite are prioritising compliance with laws and regulations, safety, conservative decision making, financial prudence and minimising actions that could lead to adverse impacts on citizens.
Medium	The Council will take considered risks when they help it successfully deliver the Council Strategy 2024 to 2028, provide the services identified in its business plans and deliver its statutory duties, but will only do so after it has given the matter careful consideration through risk assessment, and there are plans in place to implement risk controls. The Council is open to opportunities that could lead to improved public services, and it may allocate resources to higher risk projects if they align with 2024 to 2028 priorities. The Council is willing to take these risks when the potential rewards align with its priorities and risks can be managed.
High	The Council is willing to take significant risks to achieve ambitious goals, drive innovation or deliver transformative projects where the

goals, drive innovation or deliver transformative projects where there is uncertainty about the outcome, including the possibility of failure is characterised by bold decision making and innovative approach to the delivery of public services with the goal of delivering significant improvement.

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Risk Scoring

Once risks have been identified, the risk matrix serves as the primary tool for prioritisation. It enables the Council to determine which risks are most significant and therefore require greater attention and resources. The matrix also provides a consistent framework for comparing

Each risk should be analysed using a five by five matrix for (1) the probability it will happen and (2) the impact if it did occur. This assessment should be made on three different basis:

- Gross risk – risk level if existing key controls and mitigations were not in place or not
- Current risk – risk level after existing controls and mitigations are taken into consideration.
- Target risk – anticipated risk level, within the Council's risk appetite, following the introduction of planned controls and mitigations.

Assessing gross risk helps the organisation understand its reliance on existing key controls and supports decisions on risk treatment and the appropriate target risk level. A useful approach is to first consider the current risk, then ask: what would the impact and likelihood be if those key

It is the risk owner's responsibility to ensure the controls they believe are reducing the risk are effective and are working in practice. Controls that are not yet in place should not be

Each identified risk should then be plotted onto the risk matrix.

Probability						
Highly likely	5	5	10	15	20	25
Likely	4	4	8	12	16	20
Possible	3	3	6	9	12	15
Probably not	2	2	4	6	8	10
Unlikely	1	1	2	3	4	5
Impact		1	2	3	4	5
		Insignificant	Minor	Moderate	Major	Severe

When assessing the likelihood of a risk occurring, select a score from 1 to 5 on the risk matrix that best reflects what you think. This rating involves an element of professional judgement, so consider how probable the event is and take into account the following factors:

- Has this event happened before in the Council? (How frequently?) Has this event happened elsewhere? (How frequently?)
- How likely is it that one or more of the causes/ triggers of the event will occur?
- Has anything happened recently that makes the event more or less likely to occur?

The following tables provide some support in quantifying the risk in terms of probability and

Risk Probability Assessment Criteria

Risk Probability Assessment Criteria

Scale	Description	Probability of Occurrence	Description
1	Unlikely	0 to 19%	The event may occur in certain circumstances
2	Probably not	20% to 39%	The event will probably not occur
3	Possible	40% to 59%	The event may occur
4	Likely	60% to 79%	The event is likely to happen
5	Highly likely	80% to 100%	The event is highly <u>likely</u> to happen



When you select the impact you should give consideration to the factors outlined in the risk matrix. For example, if the risk you are scoring has a low financial impact but a high impact on our reputation then you would select the most appropriate number between 1 and 5 that relates to the level of reputational impact. Once again, this score will have an element of

Risk Impact Assessment Criteria

Risk Impact Assessment Criteria

	Insignificant	Minor	Moderate	Major	Severe
Strategic	Little or no impact on the delivery of the organisation's priorities	May have a minor impact on the delivery of the organisation's priorities	Would impact the delivery of the organisation's priorities	Would require a significant shift from current strategy to enable the Council to achieve its priorities	It would require a fundamental shift in strategy and Failure to deliver 2028 priority
Economic, Financial & Markets	Minor financial impact <£50k per annum	Financial impact contained within the service area £50k - £250k per annum	Budget adjusted across service areas £250k - £500k per annum	Some corporate budget realignment £500k - £750k per annum	Significant corporate budget realignment >£750k per annum
Customers & Citizens	No impact on service quality, limited disruption to operations	Minor impact on service quality, minor service standards are not met, short term disruption to operations	Significant fall in service quality and standards	Major impact on service quality, multiple service standards are not met, long term disruption to operations	Catastrophic quality and standards are not met, long term catastrophic interruption to service
Reputation	local complaints that do not attract adverse publicity	Adverse publicity locally and regionally on social media	Adverse publicity locally and regionally in mainstream media	Adverse UK wide publicity	Prolonged negative perception in the UK
	Minimal impact on the Council's	Brief disruptions and	Moderate IT and information risks that	Significant disruption to the delivery of services or	Catastrophic IT and information risks that have widespread

IT & Information	infrastructure, information management and service delivery	brier disruptions and inconvenience, but no long-term consequences	cause noticeable disruptions or delays in services. They may affect a specific group of users	financial loss, including fines. Large sections of the Council's operations impacted	have widespread consequences for the Council's function
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	Insignificant	Minor	Moderate	Major	Severe
Legal, Regulatory & Compliance	Breaches of local procedures or standards Unlikely to cause litigation	Breach of statutory regulations or standards Litigation possible	Breach of major statutory duty or internal regulations leading to disciplinary action Litigation to be expected	Significant breach of external regulations leading to intervention, sanctions, or fines Litigation almost certain and difficult to defend	Major breach suspension or discontinuation of services law punishable imprisonment Litigation is costly and impossible to defend
Organisational, Management and People, including Health and Safety and equalities	Minor issues within teams with no major impacts on service delivery Minor injury Minimal impact on the Council's ability to promote equality and diversity	Difficulties that cause short lived disruptions or inefficiencies. Less serious injury causing one-month recovery Minor equalities risks that cause brief disruptions or dissatisfaction, but no long-term harm to service delivery	Noticeable disruption and delays to operations requiring significant effort to resolve Serious injury to a person causing a six-month recovery An impact on certain groups or services, with operational inefficiencies and complaints	Significant disruption and inefficiencies that affect the Council's ability to deliver a service or priority Death or life changing injury to a person Equalities risks that significantly affect the delivery of services or reputation	Disruptions that significantly affect the Council's ability to deliver a service or priority. Death or life changing injury to more than one person A systemic breach of the Council's equality and diversity policy particularly in relation to a protected characteristic
Environmental & Sustainability	Environmental impact that disperses within a short time Minor delays in implementing sustainability initiatives	Environmental impact that is contained and rectified easily Small disruptions or inefficiencies but no long-term impact on sustainability strategy or service delivery	Environmental impact on a small area or a wider area with limited damage Noticeable delays or inefficiencies in the delivery of sustainability projects	Persistent environmental damage The Council's ability to meet its sustainability goals are undermined and key targets are missed leading to regulatory consequences	Large-scale environmental damage A complete failure to meet sustainability targets resulting in fines, and long term damage to the Council's reputation

	Insignificant	Minor	Moderate	Major	Severe
Commercial	Negligible impact on the Council's operations, finances, or reputation	Small financial losses with manageable consequences. No critical services or strategic priorities are affected	May cause disruption but does not cause long term harm to the Council's reputation or ability to meet its budget	A significant disruption to the Council's operations, financial position and a long-term impact on reputation	Large scale financial loss with the potential for a 114 notice
Political	Small scale political disagreements that do not affect decision making or lead to reputational damage	Minor disruption or reputational damage but can be managed without a significant impact on the Council's ability to perform its duties	Noticeable disruption or delays in Council decisions and reputational damage	A significant disruption to the Council's ability to operate effectively and deliver its priorities due to political conflict, public protest, or a shift in political power	A severe event that threatens the legitimacy of the Council Long term irreparable damage to reputation

Partnerships	Issues arising from the partnership are managed and have no significant impact	Some inconvenience but no long-term impact on the Council's priorities and services	More significant disruption to operations and financial position but they can be managed with appropriate resources. Active intervention required	Significantly disrupts Council services and financial stability. There are delays to the delivery of services and a loss of reputation	There is a threat to the Council's ability to operate effectively, and its reputation cannot be damaged
Technical, Operational & Infrastructure	Little impact on the Council's functions. Any problems are minor and easily addressed	Minor issues that cause short disruptions or inconvenience. No long-term effects and resolved quickly	There are more significant disruptions or delays. Service delivery may be impacted but can be resolved with additional resource	A significant disruption to Council operations affecting key services and causing substantial delays, financial loss and inconvenience to the public	The Council's ability to continue functions is threatened. Significant financial losses, or public concerns

Severe
<p>require a change in priorities. deliver a 2024 to</p>
<p>Corporate budget >£750K per</p>
<p>fall in service key service are not met, long cyclical operations</p>
<p>negative in the UK</p>
<p>IT risks that could impact</p>

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