

BREXIT Risk Assessment

This risk register should be used to capture any risks associated with the UK leaving the EU (BREXIT). It does not differentiate between leaving with or without a deal. Strategic risks are those which have the potential to affect the Council/Publica delivering its services or meeting its objectives and which cannot be managed by a single service area. Operational risks are those which could have an effect on the ability to deliver the aims/objectives of a particular service area. The risk register is a live document and must be updated regularly. If an event occurs which turns a risk into a reality then this must be captured on the issues log and any associated actions on the actions log. The original risk score identifies the level of risk when recorded. The residual risk score shows the level of risk following the application of the internal controls

Strategic Risks									
Risk ID	Date Identified	Risk Owner	Service Area	Function	Risk	Original Risk Score	Internal Controls	Residual Risk Score	Further Actions (link to actions register)
001	12/09/19 Updated 09/10/19	Christine Gore	All	All	Staff shortages - due to inability to attend work which could arise as a result of school closures, fuel shortages etc	L3 x I4 = 12	Ensure staff have ability to work from home where appropriate. Identify staff who can be redeployed to alternative tasks to cover Additional laptops to be deployed to facilitate more home working Business continuity plans have been reviewed to establish staff availability for redeployment should that be required	L3 X I2 = 6	
002	12/09/19	Christine Gore	All	All	Fuel Shortage	L3 x I4 = 12	Prioritise services, issue staff guidance on travel	L3 X I2 = 6	Ensure guidance for staff is ready to issue if required (Claire H)
Operational Risks									
Risk ID	Date Identified	Risk Owner	Service Area	Function	Risk	Original Risk Score	Internal Controls	Residual Risk Score	Further Actions (link to actions register)
003	12/09/19	Claire Hughes	Corporate Responsibility	Emergency Planning	Civil Unrest	L2 x I3 = 6	Actively monitor LRF plans Ensure all emergency response guides are up to date	L2 X I3 = 6	
004	12/09/19 Updated 09/10/19	Claire Hughes	Corporate Responsibility	Emergency Planning	Lack of resource to deal with any emergency or business continuity incident	L2 x I4 = 8	Limit leave immediately before, during, and immediately after the Brexit day to ensure sufficient staff are available Staff availability has been obtained for relevant period	L2 X I3 = 6	
005	12/09/19	Claire Hughes	Corporate Responsibility	Emergency Planning	Reduced resource to carry out the day job whilst preparing for Brexit	L4 x I3 = 12	Monitor staff resource and ensure government funding is allocated accordingly	L3 X I3 = 9	
006	12/09/19	Claire Hughes	Corporate Responsibility	Elections	Potential for further elections/referendum	L5 x I3 = 15	Update all processes and begin preparations e.g. project plans	L5 X I2 = 6	
007	12/09/19	Claire Hughes	Corporate Responsibility	Elections	Potential for canvassers to be questioned/abused	L2 x I2 = 4	Brief canvassers on how to deal with questions over Brexit/possible elections	L2 X I1 = 2	
008	12/09/19	Claire Hughes	Corporate Responsibility	Elections	Inability to complete the annual canvass due to fuel shortages	L3 X I3 = 9	Actively promote completion of householder form. Additional letter has been sent advising people of action required in case of election which should reduce the need for visits In the event of fuel shortage canvass visits will be restricted	L2 X I3 = 6	
009	12/09/19	Philip Alway	Finance	Treasury Management	The impact of a no-deal Brexit on the economy could result in a requirement for economic stimulus, such as lower interest rates, which will impact upon investment returns	L3 I 3 = 9	Treasury management advice continues to be taken from Arlingclose. Investment returns currently based upon low interest rates and will be reviewed as part of budget process. Diversification of investments which took place in 2018 reduces the impact of fixed term deposits.	L3 X I1 = 3	

010	12/09/19	Philip Alway	Finance	Treasury Management	There could be an impact upon the value of some of the investments held in pooled funds.	L2 X I3 = 6	Additional expert advice was sought earlier this year. There is currently statutory protection in place which mitigates impact upon General Fund. The capital value of the pooled funds is expected to recover over time. Councils need to take a long term view over their investment portfolios.	L2 X I2 = 4
011	12/09/19	Phil Shaw	Development Management	Landscape/ Ecology/Green Infrastructure	Potential removal of need to comply with European Environmental etc legislation with consequent ecological, wildlife etc harms	L1 X I2 = 2	Seek to maintain best practice utilising local plan and other local/national policies	L1 X I2 = 2
012	12/09/19	Phil Shaw	Development Management	Processing Planning and related applications	Downturn in economy: i) reducing applications and fee income and ii) viability of already approved developments with consequences for: - staff levels - maintenance of delivery of secured community infrastructure (e.g. Affordable Housing) - ability to meet Government Housing Delivery Test/5 year housing land supply etc targets which in turn could rest in financial and other penalties	L1 X I3 = 3	Operate as efficiently as possible until economy recovers. Build in claw back clauses into any s106 agreements to ensure that the agreed levels of contribution are restored upon economic recovery. Use local political contacts to pressure Government to waive HDT/5 year land supply requirements resulting from macro-economic as opposed to local issues.	L1 X I2 = 2
013	12/09/19	Mandy Fathers	Operational Services - Housing	Housing	Increase in Homelessness due to Affordability / Ability to pay for accommodation costs Food shortages / rising cost of living draining limited resources of low income households	L2 X I3 = 6	Council will signpost people accordingly e.g. to money advice services and CAB.	L2 X I3 = 6
014	12/09/19	Mandy Fathers	Operational Services - Housing	Housing	Potential disruption to the supply of New Build accommodation / Affordable Housing due to increased costs and/or reduction in labour leading to: - increase in house prices - reduction in properties built - reduction or loss of new homes bonus	L3 X I3 = 9	None	L3 X I3 = 9
015	12/09/19	Mandy Fathers	Operational Services - Housing	Housing	Existing landlords may have to increase rents to cover costs or sell. If rents increase then benefits bill could rise.	L2 X I3 = 6	Council will signpost people accordingly e.g. to money advice services and CAB.	L2 X I3 = 6

016	12/09/19	Mandy Fathers	Operational Services - Benefits	Housing benefit & Council Tax Support Administration	Greater demand for Discretionary Housing Payments - Increased rent due to demand as borrowing becomes more difficult making rents less affordable on benefits	L2 x I2 = 4	Training to more staff to permit assessment for DHP awards – raise awareness through partners (Citizens Advice and DWP) and improve ease to submit a claim via increasing access and simplifying	L2 X I2 = 4	Roll out training (Mandy)
017	12/09/19	Mandy Fathers	Operational Services - Benefits	Housing benefit & Council Tax Support Administration	Increased demand for food bank vouchers	L2 x I2 = 4	Improve signposting and referrals - help increase awareness - ensure all staff who may cover front of house can issue vouchers	L2 X I2 = 4	
018	12/09/19	Mandy Fathers	Operational Services - Benefits		Delay in processing benefits for people who are EEA nationals	L2 X I1 =2	Training will be delivered once process is confirmed by Government	L1 X I1 = 1	
019	12/09/19	Mandy Fathers	Operational Services - Benefits		Increase in British workers and students returning from EEA located residencies needing to claim	L2 X I1 =2	Number expected would not exceed capacity of existing staff so no specific control required	L1 X I1 = 1	
020	12/09/19 Updated 21/10/2019 - risk reduced	Mandy Fathers	Operational Services - Revenues	Business Rates	Lower income/ higher outgoings/ Inability to pay Business Rates	L2 X I1 =2	Ensure any reliefs are granted in a timely manner. Increase payment options available	L2 X I1 = 2	
021	12/09/19	Mandy Fathers	Operational Services - Revenues	Council Tax	Higher price of fuel, food etc. / Inability to pay Council Tax	L2 X I1 =2	Increase payment options available	L2 X I1 = 2	
022	12/09/19	Dene Robson	Insight & Intelligence	Funding programmes based on European Funding	Adjustment necessary in partnership working to accord with Government instruction in the light of a no deal outcome.	L1 X I1 = 1	Joint work with LEPs and the Managing Authorities.	L1 X I1 = 1	
023	12/09/19	Dene Robson	Insight & Intelligence	Funding programmes based on European Funding	Deferred consultation and action on future funding arrangements	L1 X I1 = 1	Ministry of Housing, Communities and Local Government (MHCLG) Policy Team will liaise with LEPs and instruct relevant action.	L1 X I1 = 1	
024	12/09/19	Claire Locke	Contracts	Waste/Parking	Fuel shortage	L4 X I4 = 16	- Prioritise collection of food/garden waste and residual (non-recyclable) - Run mini bus to collect staff from Swindon/Cirencester - Prioritise parking enforcement - public safety only	L3 X I3 = 9	
025	12/09/19	Martin Holland	Contracts	Waste/Parking	Car park cash collection	L2 x I2 = 4	None	L2 X I2 = 4	
026	12/09/19	Claire Locke	Contracts	Waste	Inability to secure tyres/parts for vehicles	L3 X I4 = 12	- Prioritise collection of food/garden waste and residual (non-recyclable)	L3 X I4 = 12	
027	12/09/19	Claire Locke	Contracts	Waste	Export of waste delayed	L3 X I4 = 12	- Identify alternative disposal facilities OR ask householders to store dry recycle	L3 X I4 = 12	
028	12/09/19 Updated 26/09/19	Martin Holland	Contracts	Leisure	Shortage of pool chemicals	L3 X I3 = 9	Suppliers and contractors stockpiling supplies	L2 X I2 = 4	Update 26/09/19 - We will need to mitigate the fact that some raw materials for pool chemicals are sourced from Europe. In order to prepare for this, our chemical company has stocked additional chemicals and registered for the HMRC simplification processes. We will also take action to ensure that before the 31st October we have a full stock of chemicals at each site.

029	12/09/19	Claire Locke	Contracts	Waste	Availability of staff (drivers, loaders)	L2 X I3 = 6	Ubico are trying to reduce reliance on agency staff Provide advice for non-British nationals (signpost to settlement scheme)	L2 X I3 = 6	
030	12/09/19	Claire Locke	Contracts	Waste	Reduction in recycling material values resulting in reduced income	L4 X I4 = 16	None (influenced by national/global markets)	L4 X I4 = 16	
031	12/09/19	Martin Holland	Contracts	Parking/leisure	Impact of Brexit on economy reduces customer use of services (Financial risk)	L2 x I2 = 4	None (could work with leisure contractor to consider price reductions if appropriate)	L2 X I2 = 4	
032	12/09/19	Claire Locke	Contracts	Waste	Supply of waste containers (boxes, wheelie bin, sacks)	L3 X I4 = 12	Advance order and stockpile of containers	L2 X I4 = 8	
033	12/09/19	Claire Locke	Contracts	Waste	Fuel shortage for hauliers to get to depot to collect materials thus stockpiling at depot	L3 X I4 = 12	Cease collecting recycling and ask residents to store in short term	L2 X I4 = 8	
034	12/09/19	Martin Holland	Contracts	Parking	Availability of parts for EVCPs or P & D machines	L2 x I2 = 4	P & D machines UK manufacture	L2 X I1 = 2	
035	12/09/19	Martin Holland	Contracts	Contracts	Suppliers build in 'Brexit risk' when pricing contracts – costs increase as result	L2 X I1 = 2	Council considers what risk it carries within contracts	L2 X I1 = 2	
036	12/09/19	Christine Cushwa	Assets	Estates	Economy downturn impacts on rental income (Financial risk)	L2 X I3 = 6	None	L2 X I3 = 6	
037	12/09/19	Christine Cushwa	Assets	Property	Price of building materials increases	L3 X I3 = 9	Use QS, consider alternative materials, delay non-urgent works	L3 X I2 = 6	Establish list of projects which have potential to be impacted (Christine C)
038	12/09/19	John Chorlton	ICT/Technology	Maintenance of infrastructure	Maintenance provider unable to meet Service Level Agreements due to Fuel Shortages and/or Spare Part Delivery Delays	L3 X I3 = 9	Instigate DR procedures and run systems from partner Council locations.	L3 X I3 = 9	
039	12/09/19	John Chorlton	ICT/Technology	Maintenance of devices	Maintenance provider unable to source / deliver replacement parts	L2 x I2 = 4	Being part of a partnership with 4 Councils allows each Council to hold spares and share as/when necessary	L2 X I1 = 2	
040	12/09/19	John Chorlton	ICT/Technology	Infrastructure cloud providers	Cloud Services disrupted.	L2 x I2 = 4	We still maintain the in-house ability to run services we have migrated to the Cloud in-house.	L2 X I1 = 2	
041	12/09/19	John Chorlton	ICT/Technology	Technology procurement	Additional Tariffs imposed could lead to budget overspends.	L2 x I2 = 4	Products from European companies could be delayed if solution unable to be found	L2 X I2 = 4	
042	02/10/19	Tony Oladejo	ICT	GDPR	The Council and Publica are both Data Controllers are required to comply with GDPR . In a no-deal scenario, the UK will become a 'third country' and the transfer of data with the EU will face stricter rules., and if no EU-UK data transfer agreement is made, The Council & Publica may face new compliance costs for additional restrictions.	L2 X I3 = 6	· We will continue to review the Information Commissioner's Office guidance on GDPR and assess the impact a No Deal · Publica / Council has contracts with suppliers such as Microsoft and Google & Salesforce (all these suppliers may have data centres in the EU). We have now received recent assurances from government's Ministry of Housing & Communities & Local Government that they have approached our major providers of cloud-based services, in the event of any challenge to the transfer of personal data from the EEA to the UK, they will (provided this is lawful under their relevant contract) continue providing services to government and bodies who have purchased their services.	L2 X I2 = 4	