

## **NBBC Strategic Risk Register Summary**

### **Fourth Quarter 2025/26**

#### **Full Register Summary**

The total number of 'live' risks is 25.

As at the end of March 2026, the breakdown according to "net" risk is:

- "Net red" 2 (8%)
- "Net amber" 9 (36%)
- "Net green" 14 (56%)

Consequently, 23 of 25 (92%) risks are deemed "satisfactorily managed" – meaning that the

'traffic light' reporting position is "Green" (target 80%).

The "net red" risks are:

- **R1 - Potential failure to provide adequate accommodation to meet the needs of the borough with consequent impact on the lives of residents**
- **R4 - Failure to maintain the economic vibrancy of the borough / town centres**

#### **Environment and Leisure OSP Risks Summary**

There are four strategic risks within the remit of the panel. Two are "net amber" and two are "net green". Details of these risks are shown below.



# **NBBC Strategic Risk Register**

Current Version: 14<sup>th</sup> April 2026

Environment and Leisure OSP Risks

## Risk Level Indicator Matrix and Descriptors

### Key

Green	1 – 4 (acceptable)
Amber	6 – 8 (tolerable)
Red	12 - 16 (unacceptable)

Likelihood	4	4	8	12	16
	3	3	6	9	12
	2	2	4	6	8
	1	1	2	3	4
		1	2	3	4
		<b>Impact</b>			

### Likelihood

- 4: **Very High** – occurrence is most likely or has already happened and will do so again if control measures are not introduced  
 3: **High** – occurrence is anticipated within the next 12 months  
 2: **Significant** – occurrence is probable in the next 3 years  
 1: **Low** – foreseeable, but not probable in the next 3 years

	<b>Level of Impact</b>	<b>Service Delivery</b>	<b>Financial / Legal</b>	<b>Reputation / Community</b>
4	Major	<ul style="list-style-type: none"> <li>• A service delivery failure causes significant hardship to people for a period of 3 to 4 weeks or more or 1 week for anyone that is vulnerable, or failure to meet a nationally mandated deadline</li> <li>• Loss of major stakeholder/partner.</li> <li>• Adverse outcome of a serious regulatory enquiry</li> </ul>	<ul style="list-style-type: none"> <li>• Financial loss over £400,000</li> <li>• Serious risk of legal challenge</li> </ul>	<ul style="list-style-type: none"> <li>• Sustained adverse TV/radio coverage</li> <li>• Borough wide loss of public confidence</li> <li>• Major damage to local environment, health and economy</li> <li>• Multiple loss of life</li> </ul>
3	Serious	<ul style="list-style-type: none"> <li>• A service delivery failure causes significant hardship for a period of 2 to 3 weeks or 3 to 7 calendar days for vulnerable people</li> <li>• Formal regulatory inquiry</li> <li>• Loss of a key partner or other partners</li> </ul>	<ul style="list-style-type: none"> <li>• Financial loss between £200K and £399K</li> <li>• High risk of successful legal challenge</li> </ul>	<ul style="list-style-type: none"> <li>• Significant adverse coverage in national press or equivalent low national TV coverage</li> <li>• Serious damage to local environment, health and economy</li> <li>• Extensive or multiple injuries &amp;/or a fatality</li> </ul>
2	Moderate	<ul style="list-style-type: none"> <li>• A service delivery failure causes significant hardship for 1 to 2 weeks or 1 -2 calendar days for vulnerable people</li> <li>• Loss of a significant non-key partner</li> <li>• Legal concerns raised</li> <li>• Loss of employees has moderate effect on service provision</li> </ul>	<ul style="list-style-type: none"> <li>• Financial loss between £50K and £199K</li> <li>• Informal regulatory enquiry</li> </ul>	<ul style="list-style-type: none"> <li>• Significant adverse coverage in local press or regional TV</li> <li>• Large number of customer complaints</li> <li>• Moderate damage to local environment, health and economy</li> <li>• Moderate injuries to an individual</li> </ul>
1	Low	<ul style="list-style-type: none"> <li>• Disruption to services for up to 1 week</li> <li>• Minor legal implications</li> <li>• Loss of employees not significantly affecting service provision</li> </ul>	<ul style="list-style-type: none"> <li>• Financial loss up to £49K</li> </ul>	<ul style="list-style-type: none"> <li>• Minor adverse media coverage</li> <li>• Minor environmental, health and economy damage</li> <li>• Minor increase in number of customer complaints</li> <li>• One or more minor injuries to an individual</li> </ul>

## NET AMBER RISKS

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
R22	Operation of sub-regional recycling facility in partnership with other authorities and operational costs / realisation of income	High / Major <b>(RED)</b>	1. "Arm's length" company (Sherbourne Resources Ltd.) in place with Strategic Director (PS) on the board.	1: Strategic Director (PS)	Significant / Major <b>(AMBER)</b>	1.Memoranda and articles (Company House).	Strategic Director (PS) / PH – E&PS / E&L OSP
			2. Three-year Business Plan in place and subject to regular review.	2: Strategic Director (PS) / Strategic Director (CR)		2.Business Plan in place / Council reports.	
			3.Elected Member Shareholder panel established to oversee project plan.	3: Cabinet member for Public Services		3.Panel reports and minutes.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			4. Finance and Operational bi-monthly meetings with partners and project team.	4: Strategic Directors (PS) and (CR) / Assistant Director (Environment and Enforcement)		4. Regular meetings and reports to specific working groups with Sherbourne Resources Ltd.	
			5. Sherbourne Resources Ltd. running the facility.	5: Strategic Director (PS)		5. Regular reports to Sherbourne Resources Ltd. Board.	
			6. Bi-monthly meeting of Sherbourne Resources Ltd. Board.	6; Strategic Director (PS)		6. Minutes of meetings and regularly updated project risk register.	
			7. Annual audit of accounts independently arranged by partners.	7: Strategic Directors (PS) and (CR)		7. Audit report.	
			8. Monitoring of supply and market issues.	8: Strategic Directors (PS) and (CR)		8. Accounts records. Updates to OSP.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			9. On-going site visits by officers to monitor operation.	9: Assistant Director (Environment and Enforcement)		9. OSP reports.	
			10. Finance / loan repayment in place and approved by Cabinet.	10: Strategic Directors (PS) and (CR)		10: Cabinet meeting minutes.	
			11. Assessment of recycling material from NBBC residents monitoring by Sherbourne Resources Ltd. (ongoing)	11. Assistant Director (Environment and Enforcement) and Neighbourhood Services Manager		11. Monthly reports from Sherbourne Resources Ltd).	
			12. Review of Business Plan and financial modelling by external auditor and board members.	12: Strategic Directors (PS) and (CR)		12. Minutes of meetings and Business plan signed off by shareholder panel.	
			13. Revised Business Plan 2025/28 signed off by shareholder panel.	13: Strategic Director (PS)		13. Shareholder panel meeting minutes.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			14.Quarterly reports to NBBC Shareholder Panel.	13: Strategic Director (PS / Managing Director (Sherbourne Resources Ltd.)		14. NBBC Shareholder Panel meeting minutes.	
			15.Education Officer appointed to meet recycling targets.	15:Neighbourhood Services Manager		15.Officer in place / monitoring of recycling rates.	
			16.Board membership reflects designated roles and non-executive Directors.	16:Strategic Director (PS)		16.Cabinet minutes (CB 107, March 2026).	
			<b>Planned:</b>				
			1. Annual reviews of the recycling facility to OSP.	1: Assistant Director (Environment and Enforcement)		1. OSP /Cabinet report / minutes.	
			2. Financial review of NBBC partnership to be presented as part of the budget-setting process for 2027/28.	2: Strategic Director (PS) / Strategic Director (CR)		2. Cabinet / Council minutes.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
R25	<p>Noncompliance with regulations relating to:</p> <ul style="list-style-type: none"> <li>Freedom of Information</li> <li>Environmental Information</li> <li>General Data Protection</li> </ul> <p>resulting in penalties applied by the Information Commissioner's Office</p>	Very high / major <b>(RED)</b>	<b><u>Freedom of Information / Environmental Information</u></b>		Significant / major <b>(AMBER)</b>		Management Team / PH – Cabinet / H&CR, H&COM, E&L & BRP OSPs
			1.Monthly FOI reports to designated service areas.	1: Corporate Support and Data Compliance Manager		1.Reports.	
			2.Dash Customer Service Workflow application used to manage outstanding cases.	2: Strategic Director (CR)		2.Dash application.	
			3.Email alerts on receipt of new requests.	3: Strategic Director (CR)		3.Emails.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			4.Nominated officers in some service areas to monitor outstanding requests.	4: Chief Executive / Strategic Directors		4.Nominated Officers.	
			5.Workflow process regularly reviewed and updated if necessary	5: Information Management Group (IMG)		5.Request reports.	
			6. Regular targeted training on meeting FOI request deadlines.	6: Information Management Group (IMG)		6.Training records.	
			7. Nominated employees to monitor and manage FOI / EIR requests.	7: Strategic Director (CR)		7. Officer in place.	
			8. Qualified DPO co-ordinating information in line with the Freedom of Information Act 2000	8: Strategic Director (CR)		8. Officer in place.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			<b><u>Planned:</u></b>				
			1.Refresher training for Senior Managers (September 2025).	1: Corporate Support and Data Compliance Manager		1.Senior Management Team minutes / training records.	
			<b><u>General Data Protection Regulations (GDPR)</u></b>				
			1. Corporate Information Governance Group (CIGG) / Information Management Group.	1: Corporate Support and Data Compliance Manager		1.Meeting minutes.	
			2. Use of an accredited contractor to dispose of electrical equipment (including IT equipment). The contractor guarantees data destruction & provides certification accordingly.	2: Strategic Director (CR)		2. Contractor agreement and meetings minutes	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			3. Compliance with Public Services Network Code of Connection (PSN Co-Co).	3: Strategic Director (CR)		3. Annual PSN Compliance Certification / "Cyber Essentials Scheme" certification.	
			4. Senior Information Risk Owner (SIRO) and Deputy appointed.	4: Strategic Director (CR)		4. SIRO's Job Description	
			5. Information Governance Framework/ ICT Code of Conduct for Employees/Member Protocol for the Use of IT Resources.	5: Assistant Director (Digital & Business Change)		5. Individual Cabinet Member Decision	
			6. Data Protection Officer (DPO) in line with Data Protection regulations.	6: Corporate Support and Data Compliance Manager		6. DPO in place.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			7. Data audit and publication of privacy notices.	7: Assistant Director (Democracy and Governance).		7. Audit records (records of processing activity)/notices on council website: <a href="#">Customer services and Nuneaton and Bedworth Borough Council website   Privacy notice   Nuneaton and Bedworth Borough Council.</a>	
			8. Internal Audit undertaken (Option via Central Midlands Audit Partnership).	8: Assistant Director (Democracy and Governance)		8. Reports in place, reports to Audit and Standards Committee (progress updates, update plan and Annual audit opinion) <a href="#">Meetings – Nuneaton and Bedworth Borough Council</a>	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			9. Data Protection training available on Delta.	9: DPO and Training Officer		9. Delta training records	
			10. Refresh of Corporate Governance Group (CGG) / Information Management Group - refresh of terms of reference (T of R) for CGG (May 2025 at Corporate Executive Team), and Information Management Group established and in place following T of R approved at SLT (October 2025).	10: Assistant Director (Democracy and Governance) / DPO		10.Meetings minutes.	
			11. Data Protection information available to employees via NBBC Intranet.	11: DPO		11. NBBC Intranet.	

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			<b><u>Planned:</u></b>				
			1. Data Protection policy to be updated (June 2026).	1: DPO		1. Policy approved.	
			2. Information Asset Register to be established (timescale to be agreed with Information Management Group).	2: DPO / Information asset owners		2. Register in place.	
			3. Data protection and Freedom of Information Act training for Senior Managers (on-going).	3: DPO		3. Senior Management meeting records.	
			4. Data Protection training to be reviewed to ensure that it is up to date and appropriate (on-going).	4: DPO and Training Officer		4. Delta training records.	

## NET GREEN RISKS

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
R27	Arson or accidental fire in NBBC corporate buildings	Significant / Major <b>(AMBER)</b>	1. Fire Management Group (FMG).	1: Strategic Directors (PS) / (H&CS) / Assistant Directors (Environment and Enforcement / SH&CS)	Low / Major <b>(GREEN)</b>	1. FMG meeting minutes. HASCOG reports.	Management Team / PH – B&R, R&CS & LC&H, / BRP, E&L & H&CR OSP
			2. Regularly serviced fire detection & alarm systems / fire extinguishers and appropriate Fire Risk Assessments (FRA) regularly reviewed.	2: Strategic Director (H&CS) / Assistant Director (SH&CS)		2. Service records, Fire extinguisher service records & records of FRA outcomes. External report (review of arrangements).	
			3. Quarterly Health & Safety inspections give attention to fire risks.	3: Respective Strategic / Assistant Directors.		3. Quarterly Health & Safety inspection records.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			4. Annual Capital Fire Safety Work Programme.	4: Strategic Director (H&CS) / Assistant Director (Social Housing and Community Safety)		4. Cabinet reports and Capital Projects Meeting Minutes.	
			5. Existing insurance policy documents.	5: Assistant Director (Finance)		5. Policy documents in place.	
			6. Internal audit of fire risk arrangements (completed February 2022).	6: Audit and Governance Manager (CMAP)		6. Internal Audit report.	
			7. Certified fire doors.	7: Strategic Director (H&CS) / Assistant Director (Social Housing and Community Safety)		7. Doors / Certification in place.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			8. Corporate review of Health and Safety arrangements (September 2025).	8: Strategic Director (PS)		8. SLT Report / minutes.	
			9. Town Hall fire prevention arrangements (including upgrade of door entry system).	9: Strategic Director (H&CS) / Assistant Director (Social Housing and Community Safety) / Health and Safety Manager		9. Monitored action plan in place / Updates to Fire Services	
			10. Implement periodic Audit report (CMAP) recommendations.	10: Health and Safety Manager		10. Audit action plan.	
			11. Act on appropriate recommendations arising from public enquiries / legislation changes (on-going).	11: Strategic Director (H&CS) / Assistant Director (Social Housing and Community Safety) / Health and Safety Manager		11. Reports / action plans.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			<b><u>Planned:</u></b>				
			1. Review and refresh Business Continuity Plans (2026/27).	1: Strategic / Assistant Directors			
			2. <b>Leasehold commercial properties</b> – review and establish landlord checks for structure / electrical / gas / fire safety and security of empty purchased properties pending redevelopment (2026/27).	2: Strategic Director (H&CS) / Assistant Director (Social Housing and Community Safety) / Assistant Director (Economy)			
			3. Review of corporate assets and associated operations (2026/27).	3: Strategic Director (H&CS) / Assistant Director (Social Housing and Community Safety)		3.Review findings / updated register / CET report.	

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R30	Ombudsman Complaints (Local Government Ombudsman / Housing Ombudsman) – failure to meet customer expectation after completion of our complaints process	High / Low <b>(GREEN)</b>	1. Formal complaints policy and process.	1: Corporate Support and Data Compliance Manager	High / Low <b>(GREEN)</b>	1. Policy and procedure in place.	Strategic Director (CR) / PH Cabinet / H&CR, H&COM, E&L & BRP OSPs
			2. Designated support and compliance team in place.	2: Corporate Support and Data Compliance Manager		2. Designated manager / team in place.	
			3. Review / Final check of service area escalated responses.	3: Corporate Support and Data Compliance Manager		3. Review records retained.	
			4. Ombudsman monitoring by SLT (Strategic Performance Report).	4: SLT		4. Strategic Performance Report.	

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			5. Annual Ombudsman report to Scrutiny panel.	5: Corporate Support and Data Compliance Manager		5. FPS meeting minutes.	
			<b><u>Planned:</u></b>				
			1. Update complaints policy following regulatory changes (May 2026).	1: Chief Executive / Strategic Director (CR)		1. Updated policy in place.	
			2. Quarterly data compliance update report to SLT.	2: Corporate Support and Data Compliance Manager		2. SLT meeting minutes.	

## **NBBC Strategic Risk Register Summary**

### **Fourth Quarter 2025/26**

#### **Full Register Summary**

The total number of 'live' risks is 25.

As at the end of March 2026, the breakdown according to "net" risk is:

- "Net red" 2 (8%)
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Consequently, 23 of 25 (92%) risks are deemed "satisfactorily managed" – meaning that the 'traffic light' reporting position is "Green" (target 80%).

The "net red" risks are:

- **R1 - Potential failure to provide adequate accommodation to meet the needs of the borough with consequent impact on the lives of residents**
- **R4 - Failure to maintain the economic vibrancy of the borough / town centres**

#### **Health and Corporate OSP Risks Summary**

There are sixteen strategic risks within the remit of the panel. Five are "net amber" and eleven are "net green". Details of these risks are shown below.



# **NBBC Strategic Risk Register**

Current Version: 14<sup>th</sup> April 2026

Health and Corporate OSP Risks

## Risk Level Indicator Matrix and Descriptors

### Key

Green	1 - 4 (acceptable)
Amber	6 - 9 (tolerable)
Red	12 - 16 (unacceptable)

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### Impact

#### Likelihood

- 4: **Very High** – occurrence is most likely or has already happened and will do so again if control measures are not introduced  
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## NET AMBER RISKS

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R8	Failure to deliver / refresh the key elements of the Corporate Plan	Very High / Moderate <b>(AMBER)</b>	1. Member training programme.	1: Chief Executive	High / Moderate <b>(AMBER)</b>	1. Records of all formal Employee & Member meetings and training.	Management Team / PH - Leader and R&CS / H&CR OSP
			2. Annual Development Reviews.	2: Strategic Directors		2. Records of all formal Employee & Member meetings and training.	
			3. Management Development training.	3. Strategic Director (CR)		3. Records of all formal Employee & Member meetings and training.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			4. Performance management framework.	4: Assistant Director (Democracy and Governance)		4. <a href="#">Constitution</a> (ref 5Q). Senior Leadership Team (SLT) performance report (monthly) / Directorate Management Teams (DMTs) performance reports (monthly) / three times per year performance reports to Overview and Scrutiny Panels. ( <a href="#">BRP</a> , <a href="#">EL</a> , <a href="#">HCR</a> , <a href="#">HC</a> ).	
			5. Corporate Plan Delivery Plan reviewed quarterly.	5: Chief Executive		5. Delivery plan in place / SLT reports.	
			6. Monitor and utilise external funding opportunities.	6: Management Team		6. Capital Programme and Revenue Budgets.	

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			7. Partnership working arrangements.	7: Management Team		7. Partnership board meeting minutes.	
			8. On-going annual review of delivery plan.	8: Assistant Director (Democracy and Governance)		8. Current plan in place. April 2025 <a href="#">Cabinet</a> (agenda item 8), <a href="#">Council</a> (agenda item 11a). March 2026 <a href="#">Cabinet</a> (agenda item 10).	
			9. Medium Term Financial Plan (reviewed annually).	9: Strategic Director (CR)		9. Current plan in place / Cabinet reports.	
			10. HRA Business Plan (reviewed annually).	10: Strategic Directors (CR) / (H&CS)		10. Current plan in place / Cabinet reports	
			11. Revised Corporate Plan 2025/29 in place following new political leadership.	11: Assistant Directors (Democracy and Governance)		11. Approved plan in place. April 2025 <a href="#">Cabinet</a> (agenda item 8), <a href="#">Council</a> (agenda item 11a).	

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			<b><u>Planned:</u></b>				
			1. Annual (31 <sup>st</sup> March) review of Delivery Plan against external factors.	1: SLT/ Cabinet.			
			2. Review of Annual Development Review (ADR) process (June 2026)	2: Strategic Director (CR)			

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R16	“Cyber” crime or attack	High/ Major <b>(RED)</b>	1.Anti-virus, managed firewall, security patches and robust back-up procedure updated weekly.	1: ICT and Comms. Manager	Significant / Major <b>(AMBER)</b>	1.PSN certification in place	Strategic Director (CR) / PH – R&CS / H&CR OSP
			2.Awareness training sessions held throughout the year.	2: ICT and Comms. Manager		2. Training programme and attendance records.	
			3.Monthly e-communication from Cyber Crime Officer (WCC).	3: Strategic Director (CR)		3. Monthly e-communication.	
			4.Public Services Network (PSN) annual compliance certification.	4: ICT and Comms. Manager		4. PSN certification in place	
			5.Post “Azure” migration, LGA cyber security peer review undertaken (December 2023).	5: ICT and Comms. Manager		5. Peer review report.	

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			6. Phishing e-mail testing of staff to identify and action training requirements (On-going).	6: ICT and Comms. Manager		6. Tests undertaken and training identified.	
			<b><u>Planned:</u></b>				
			1. "Cyber Essentials" certification application to be resubmitted pending Cyber security and risk review (2026/27, subject to upgrade of Electoral Registration software).	1: ICT and Comms. Manager		1. Certificate in place.	
			2. Test internal e-mail security (on-going).	2: ICT and Comms. Manager		2. Report to Management Team.	
			3. Access to Electoral Registration database to be addressed (linked to Central Government elections "cyber" security threat briefing).	3: Democratic and Electoral Services Manager		3. Review completed with access arrangements in place and monitored at least annually.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			4.Review of maintenance, access, storage and disposal of shared files containing electoral data.	4: Democratic and Electoral Services Manager		4: Review completed / records.	
			5.Review and update ICT Security Policy (April 2026).	5: Assistant Director (Digital and Business Change)			

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
R20	Pandemic – service, social and economic implications	Very High/ Major <b>(RED)</b>	1. Corporate Business Continuity Plan.	1: Chief Executive	Significant / Major <b>(AMBER)</b>	1. Plan in place.	Management Team / PH - Cabinet / H&CR OSP
			2. Business Continuity Plans (BCPs).	2: Assistant Directors		2: Plans in place.	
			3. Emergency Plan including regular training.	3: Strategic Director (CR)		3. Plan in place / training records.	
			4. Risk assessment in place to address and co-ordinate the safe delivery of (revised) services / working arrangements.	4: Head of Health and Safety and Environmental Health		4. Risk assessment in place.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			5. Pandemic response and recovery: <ul style="list-style-type: none"> <li>• Incident Management Team</li> <li>• Implement responsibilities linked to Civil Contingencies Act</li> </ul>	5: Chief Executive		5. Terms of reference / meeting minutes:	
			6. Implement directives from Central Government, as required.	6: Chief Executive		6. Regular completion of pro forma returns to Government.	
			7. Effective and timely communication systems (employees, Elected Members, public and media).	7: Chief Executive		7. E-mail and public / media communications / bulletins.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			8. Encourage employees to take up vaccination offers.	8: Chief Executive		8. Employee newsletters and bulletins.	
			<b><u>Planned:</u></b>				
			1. Update Emergency / Business Continuity Plans (2026/27).	1: Management Team		1. Plans in place.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
R25	<p>Noncompliance with regulations relating to:</p> <ul style="list-style-type: none"> <li>Freedom of Information</li> <li>Environmental Information</li> <li>General Data Protection</li> </ul> <p>resulting in penalties applied by the Information Commissioner's Office</p>	Very high / major <b>(RED)</b>	<b><u>Freedom of Information / Environmental Information</u></b>		Significant / major <b>(AMBER)</b>		Management Team / PH – Cabinet / H&CR, H&COM, E&L & BRP OSPs
			1.Monthly FOI reports to designated service areas.	1: Corporate Support and Data Compliance Manager		1.Reports.	
			2.Dash Customer Service Workflow application used to manage outstanding cases.	2: Strategic Director (CR)		2.Dash application.	
			3.Email alerts on receipt of new requests.	3: Strategic Director (CR)		3.Emails.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			4.Nominated officers in some service areas to monitor outstanding requests.	4: Chief Executive / Strategic Directors		4.Nominated Officers.	
			5.Workflow process regularly reviewed and updated if necessary	5: Information Management Group (IMG)		5.Request reports.	
			6. Regular targeted training on meeting FOI request deadlines.	6: Information Management Group (IMG)		6.Training records.	
			7. Nominated employees to monitor and manage FOI / EIR requests.	7: Strategic Director (CR)		7. Officer in place.	
			8. Qualified DPO co-ordinating information in line with the Freedom of Information Act 2000	8: Strategic Director (CR)		8. Officer in place.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			<b><u>Planned:</u></b>				
			1.Refresher training for Senior Managers (September 2025).	1: Corporate Support and Data Compliance Manager		1.Senior Management Team minutes / training records.	
			<b><u>General Data Protection Regulations (GDPR)</u></b>				
			1. Corporate Information Governance Group (CIGG) / Information Management Group.	1: Corporate Support and Data Compliance Manager		1.Meeting minutes.	
			2. Use of an accredited contractor to dispose of electrical equipment (including IT equipment). The contractor guarantees data destruction & provides certification accordingly.	2: Strategic Director (CR)		2. Contractor agreement and meetings minutes	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			3. Compliance with Public Services Network Code of Connection (PSN Co-Co).	3: Strategic Director (CR)		3. Annual PSN Compliance Certification / "Cyber Essentials Scheme" certification.	
			4. Senior Information Risk Owner (SIRO) and Deputy appointed.	4: Strategic Director (CR)		4. SIRO's Job Description	
			5. Information Governance Framework/ ICT Code of Conduct for Employees/Member Protocol for the Use of IT Resources.	5: Assistant Director (Digital & Business Change)		5. Individual Cabinet Member Decision	
			6. Data Protection Officer (DPO) in line with Data Protection regulations.	6: Corporate Support and Data Compliance Manager		6. DPO in place.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			7. Data audit and publication of privacy notices.	7: Assistant Director (Democracy and Governance).		7. Audit records (records of processing activity)/notices on council website: <a href="#">Customer services and Nuneaton and Bedworth Borough Council website   Privacy notice   Nuneaton and Bedworth Borough Council.</a>	
			8. Internal Audit undertaken (Option via Central Midlands Audit Partnership).	8: Assistant Director (Democracy and Governance)		8. Reports in place, reports to Audit and Standards Committee (progress updates, update plan and Annual audit opinion) <a href="#">Meetings – Nuneaton and Bedworth Borough Council</a>	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			9. Data Protection training available on Delta.	9: DPO and Training Officer		9. Delta training records	
			10. Refresh of Corporate Governance Group (CGG) / Information Management Group - refresh of terms of reference (T of R) for CGG (May 2025 at Corporate Executive Team), and Information Management Group established and in place following T of R approved at SLT (October 2025).	10: Assistant Director (Democracy and Governance) / DPO		10.Meetings minutes.	
			11. Data Protection information available to employees via NBBC Intranet.	11: DPO		11. NBBC Intranet.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			<b>Planned:</b>				
			1. Data Protection policy to be updated (June 2026).	1: DPO		1. Policy approved.	
			2. Information Asset Register to be established (timescale to be agreed with Information Management Group).	2: DPO / Information asset owners		2. Register in place.	
			3. Data protection and Freedom of Information Act training for Senior Managers (on-going).	3: DPO		3. Senior Management meeting records.	
			4. Data Protection training to be reviewed to ensure that it is up to date and appropriate (on-going).	4: DPO and Training Officer		4. Delta training records.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
<b>R34</b>	Corporate Fraud: <ul style="list-style-type: none"> <li>• Procurement</li> <li>• Payments and Finance</li> <li>• Elections</li> <li>• Employment application / recruitment</li> <li>• Internal Fraud</li> <li>• Housing benefit fraud, tenancy fraud, Right to Buy fraud, subletting and Council tax fraud</li> <li>• External grants (3rd sector, private sector and activity-based funding/grants)</li> <li>• Insurance claims</li> <li>• Insider and employee fraud</li> </ul>	Very High/ Major <b>(RED)</b>	1. Employment of a Corporate Fraud Officer.	1: Assistant Director (Finance)	High / Serious <b>(AMBER)</b>	1. Officer in place.	Management Team / R&CS / H&CR OSP
			2. National Fraud Initiative.	2: Assistant Directors (Democracy and Governance / Finance / Social Housing and Community Safety)		2. Records and exercise undertaken every 2 years (data upload, checked and updated)	
			3. Approved officers for different levels of approval for credit cards, purchase orders, invoices and payments.	3: Assistant Director (Finance)		3. Records and authorised list. Systems updated.	
			4. Officer declarations of interest process and duty.	4: Assistant Director (Democracy and Governance)		4. Records maintained.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			5. Member declarations of interest process and duty.	5: Assistant Director (Democracy and Governance)		5. Records Maintained. <a href="#">Councillor Declarations of Interests 2025-2026   Nuneaton and Bedworth Borough Council</a> .	
			6. Annual accounts – third party related transactions (chief officers).	6: Assistant Director (Finance)		6. Records maintained.	
			7. Procurement conflicts of interest assessment forms and declarations.	7: Assistant Director (Democracy and Governance)		7. Records maintained.	
			8. Procurement Contract Procedure Rules and Strategy.	8: Assistant Director (Democracy and Governance)		8. Strategy and Procedure Rules in place. <a href="#">Constitution</a> (ref: 4G)	
			9. Access to Internal Audit provision (CMAP).	9: Strategic Director (CR)		9. CMAP in place.	
			10. Employee Code of Conduct.	10: People Services Manager.		10. Code in place.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			11. Elected Member Code of Conduct.	11: Assistant Director (Democracy and Governance)		11. Code in place. <a href="#">Constitution</a> (ref: 5AA and 5A Member Code of Conduct Complaint Process)	
			12. Corporate Governance Training.	12: Assistant Director (Democracy and Governance)		12. Training records on training system (Delta).	
			13. No Purchase Order No Pay Policy, Financial Procedure Rules and segregation of duties.	13: Assistant Director (Finance)		13. Strategy and Procedure Rules in place.	
			14. Evidence-based insurance claims to mitigate fraudulent insurance claims.	14: Assistant Director (Finance)		14. Records maintained, and checks undertaken.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			15. Council policies and procedures (Employee Code of Conduct, Gifts & Hospitality Policy, Anti-Fraud, Corruption and Bribery Strategy, Anti-Money Laundering Policy, Whistleblowing Procedures).	15: Assistant Director (Democracy and Governance) / Assistant Director (Finance) / People Services Manager		15. Policies and Procedure Rules in place. <a href="#">Constitution</a>	
			16. Directors are responsible for ensuring that there is a strong internal control environment within their service areas, for example, by making sure that proper authorisation and approval controls are in place, e.g. payroll documentation, or that certain duties are divided amongst the team to prevent the risk of fraud or accidental error.	16: Strategic Directors and Assistant Directors		16.Procedures updated and tested following National Fraud Initiative and Audits.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			17. Recruitment employee related checks (No right to work in the UK, false identity, false qualifications, false references, concealment of key information for example reasons for breaks in employment history).	17: People Services Manager		17. Checks in place and files recorded and maintained.	
			18. Evidence based checks and challenge for over inflation of activity data by providers to obtain increased funding / payments from the Council for all grant applications.	18: Strategic Directors and Assistant Directors		18. Checks in place and files recorded and maintained.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			19. Electoral based fraud: identify fraud, applications for registration, absent voters and voter ID.	19: Democratic and Electoral Services Manager		19. Records maintained per elections risk register.	
			20. Undertake visits to properties across the housing stock to ensure that the tenants assigned are residing there as their main and principal home.	20: Assistant Director (Social Housing and Community Safety)		20. Correspondence / records of checks.	

## NET GREEN RISKS

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
R3	A major NBBC contractor or supplier cannot deliver a service as planned or ceases trading / failure to comply with requirements for procuring goods and services	Significant / Major <b>(AMBER)</b>	1. Managed under the Democracy and Governance Operational Risk Register.	1: Assistant Director (Democracy and Governance)	Low / Major <b>(GREEN)</b>	1. Democracy and Governance Operational Risk Register (CM Folder Ref: FDR25/1318).	Management Team / PH – R&CS / H&CR OSP
			2. Procurement Team notify service areas of declining economic financial stability of a supplier for appropriate action.	2: Procurement Team / Assistant Directors		2. Correspondence and Credit Agency records.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
R7	Breakdown of Council services due to an emergency or significant incident.	Low/Major (AMBER)	1. Corporate Business Continuity Plan.	1: Management Team	Low/Serious (GREEN)	1. Plan in place.	Chief Executive and Strategic Director (CR) / PH - Cabinet / H&CR OSP
			2. Emergency Plan including regular training.	2: People Services Manager		2: Plan in place.	
			3. Shared service Emergency Planning Officer in place.	3: Strategic Director (CR)		3. Joint Emergency Planning Officer (JEPO) two-year work streams plan.	
			4. Flexibility of working at Town Hall or Gresham Road Depot.	4: Strategic Director (CR)		4. Availability of locations.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			5. People Services Manager appointed as strategic lead officer for emergency planning.	5: Strategic Director (CR)		5. Officer in post.	
			6. Business Continuity Planning policy.	6: Strategic Director (CR)		6. Policy in place.	
			7. Updated Emergency Plan.	7: Strategic Director (CR) and Joint Emergency Planning Officer (shared service)		7. Plan in place.	
			8. "Cloud"-based service has replaced server rooms in council buildings.	8: Strategic Director (CR) and Joint Emergency Planning Officer (shared service)		8. Service in place.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			9. On-going Strategic and Assistant Directors attending Warwickshire Local resilience Forum (WLRF) training on Civil Contingencies Act responsibilities.	9: Chief Executive		9. Training records held by WLRF.	
			10.Engagement with WLRF and Coventry, Solihull and Warwickshire partnership (CSW), as appropriate, to explore options to mitigate national power outages.	10: Strategic Director (CR)		10.Meeting minutes	
			<b><u>Planned:</u></b>				
			1. Update Business Continuity Plans (2026/27).	1: Strategic Directors			
			2. Training sessions on new Emergency Plan by end of June 2026.	2: Strategic Director (CR)			

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			3.NBBC to employ Emergency Planning Officer and move away from CSWR partnership to allow greater local resilience relating to emergency planning. (2026/27)	3: Assistant Director (Recreation and Culture)			

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
R10	Failure to effectively manage the Council's finances	V. High / Serious <b>(RED)</b>	1. Adequate level of reserves held to manage fluctuations. Section 151 assurance statement on budget proposals	1: Strategic Director (CR)	Low / Moderate <b>(GREEN)</b>	1. Reserves maintained and kept under review / S151 Officer's annual Assurance Statement on reserves.	Chief Executive & Strategic Director (CR) – Section 151 Officer / PH – R&CS / H&CR OSP
			2. Housing Revenue Account Business Plan (regularly updated).	2: Strategic Director (H&CS)		2. Internal audit / annual Cabinet report.	
			3. Medium-Term Financial Plan (Updated February 2026).	3: Strategic Director (CR)		3. Cabinet / Full Council minutes.	
			4. Strategic Risk Register maintenance and review.	4: Risk Management and Performance Officer		4. Document controlled Strategic Risk Register.	
			5. Financial and contract procedure rules and associated regular training.	5: Assistant Director (D&G)		5. Internal / External audit reports / training records.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			6. Level of reserves reviewed as part of annual budget setting process.	6: Strategic Director (CR)		6. Cabinet report.	
			7. Section 151 Officer in post.	7: Chief Executive		7.Member-led appointment process.	
			8.Multi-year capital budget and funding monitoring (in February).	8: Strategic Director (CR)		8.Cabinet / Council reports.	
			<b><u>Planned:</u></b>				
			1.Medium-Term Financial 3-year Strategy (July 2026).	1: Strategic Director (CR)			

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
R12	Safeguarding children and adults with care and support needs from abuse, neglect and harm	Significant / Serious (AMBER)	1. Safeguarding Policy and Guidance (and subject to regular review)	1: Assistant Director (Democracy and Governance)	Low / Serious (GREEN)	1. Policy in place ( <a href="#">NBBC Safeguarding Policy   Nuneaton and Bedworth Borough Council</a> ) and training records.	Strategic Director (CR) / PH – R&CS / H&CR OSP
			2. Corporate safeguarding lead officer and single point of contact for Warwickshire Family Connect.	2: Assistant Director (Democracy and Governance)		2. Job description and person specification.	
			3. NBBC Recruitment & selection procedure.	3: Strategic Director (CR)		3. Recruitment records.	
			4. Disclosure & Barring Service policy and checks (DBS).	4: People Services Manager		4. DBS check records.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			5. Warwickshire Family Connect and Adult Social Care (ASC).	5: Assistant Director (Democracy and Governance)		5. NBBC ( <a href="#">Safeguarding children   Safeguarding   Nuneaton and Bedworth Borough Council</a> ) and WCC ( <a href="#">Warwickshire Safeguarding</a> ).	
			6. Safeguarding refresher training (every 3 years).	6: Assistant Director (Democracy and Governance)		6. Training records ("DELTA").	
			7. Warwickshire Safeguarding partnership best practice guidelines.	7: Assistant Director (Democracy and Governance)		7. Warwickshire Safeguarding website ( <a href="#">Warwickshire Safeguarding</a> ).	
			8. Warwickshire Housing safeguarding lead officer.	8: Assistant Director (Social Housing and Community Safety)		8. Correspondence / meeting minutes.	
			9. Multi Agency Public Protection Authority (MAPPA).	9: Assistant Director (Social Housing and		9. Minutes of meetings.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
				Community Safety)			
			10.Referrals and requests for information (separate ones for Children and Adults).	10: Assistant Director (Democracy and Governance)		10. DASH Safeguarding referral process / referrals and requests records.	
			<b><u>Planned:</u></b>				
			1. Update sharing agreement with Warwickshire Family Connect / Warwickshire Safeguarding Children's Board (in 2026/27).	1: Assistant Director (Democracy and Governance) / Equalities and Safeguarding Officer		1. Revised agreement in place.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
R15	Insufficient planning or resourcing of capital investment priorities	Significant / Serious (AMBER)	1. Corporate / Strategic programme management arrangements.	1: Chief Executive	Low / Moderate (GREEN)	1. Minutes of meetings (including Strategic / HRA / ITC / Regeneration / Corporate Asset Management programme boards).	Management Team / PH - Cabinet / H&CR OSP
			2. Housing Revenue account (HRA) Business Plan regularly reviewed.	2: Strategic Directors (H&CS) and (CR)		2. Plan and dedicated Finance Business Partner in place.	
			3. Medium Term Financial Plan including regular review.	3: Strategic Director (CR)		3. Plan in place.	
			4. Internal audit programme.	4: Strategic Director (CR)		4. Audit reports.	
			5. Treasury Management Strategy and Prudential Indicators.	5: Strategic Director (CR)		5. Strategy in place / Council minutes.	

<b>Risk Ref</b>	<b>Risk Description</b>	<b>Gross Risk</b>	<b>Mitigation Control Existing / Ongoing</b>	<b>Mitigation Owner</b>	<b>Net Risk / Status</b>	<b>Sources of Assurance</b>	<b>Risk Owner / Portfolio (PH) / OSP</b>
			6. Regular reporting on the multi-year Capital programme.	6: Strategic Director (CR)		6. Reports.	
			7. WMCA funding for land remediation.	7: Strategic Director (H&CS)		7. Funding received.	
			8. Local Regeneration funding agreed.	8: Strategic Director (H&CS)		8. Monitoring and evaluation return and programme board minutes	
			9. Bedworth funding agreed.	9: Strategic Director (H&CS)		9. Funding agreement in place. Corporate programme strategic board minutes.	
			10. Monthly WMCA engagement meetings.	10: Strategic Director (H&CS)		10. Meeting minutes / funding applications.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			11. HRA Corporate Programme Strategic Board to oversee major capital work spend / budget management.	11 Strategic Director (H&CS)		11. Meeting minutes.	
			12. Annual General Fund / HRA budget setting (3-year budget process).	12: Strategic Director (CR)		12. Cabinet meeting minutes.	
			13. Budget monitoring.	13: Management Team (Senior Leadership Team)		13. MT reports / minutes.	
			14. Programme management arrangements.	14: Management Team (Senior Leadership Team)		14. MT reports / minutes.	
			15. Investment plan agreed under the Local Regeneration funding programme.	15: Strategic Director (H&CS)		15. Agreement in place.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			16. Up-to-date Capital Strategy in place (December 2025).	16: Assistant Directors (Finance) and (Economy) / Strategic Director (CR / Strategic Director (H&CS)		16. Strategy in place.	
			<b>Planned:</b>				
			1. Revised HRA Asset Management Plan (2026/27).	1: Assistant Director (Social Housing and Community Safety)		1. Plan in place.	
			2. Establish up-to-date Asset Management Plan & including Acquisition and Disposal programme (in first quarter 2026/27).	2: Assistant Directors (Finance), (Social Housing and Communities) and (Economy) / Strategic Director (CR / Strategic Director (H&CS)		2. Cabinet / Full Council reports / Corporate Governance Group minutes	
			3. Review of HRA governance arrangements (2026/27).	3: Strategic Director (H&CS)		3. Housing and Communities OSP report.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
R23	Communications - disruptive adverse comment or media coverage reflecting extremely badly on the Council, impacting on the reputation of the Council and/or the Borough, resulting from failure to take appropriate communications action	Low / Moderate <b>(GREEN)</b>	1. Communications and marketing strategy associated protocols and plans (and on-going review).	1: Strategic Director (CR)	Low / Moderate <b>(GREEN)</b>	1. Press releases, training, communications and marketing action plan; media statements; Media monitoring.	Strategic Director (CR) / PH - Cabinet / H&CR OSP
			2. Media training for Strategic / Assistant Directors.	2: Communications and Marketing Manager		2. Training records.	
			3. LGA social media training for Elected Members (and on-going internal training, as required).	3: Chief Executive		3. Training delivered / records.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			<b><u>Planned:</u></b>				
			1. Review and update of Communications and marketing strategy (October 2026).	1: Strategic Director (CR)			
			2. Refresh of media training for Strategic / Assistant Directors (March 2027).	2: Communications and Marketing Manager			

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
R26	Non-compliance with Department of Work and Pensions (DWP) data use guidelines.	High / Serious <b>(AMBER)</b>	1. On-going system testing linked to DWP plan.	1: Strategic Director (CR)	Low / Low <b>(GREEN)</b>	1. DWP plan.	Strategic Director (CR) / PH – R&CS / H&CR OSP
			<b><u>Planned:</u></b>				
			1.On-going audit of DWP Plan.	1: Assistant Director (Finance)		1.Audit logging records.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
R27	Arson or accidental fire in NBBC corporate buildings	Significant / Major <b>(AMBER)</b>	1. Fire Management Group (FMG).	1: Strategic Directors (PS) / (H&CS) / Assistant Directors (Environment and Enforcement / SH&CS)	Low / Major <b>(GREEN)</b>	1. FMG meeting minutes. HASCOG reports.	Management Team / PH – B&R, R&CS & LC&H, / BRP, E&L & H&CR OSP
			2. Regularly serviced fire detection & alarm systems / fire extinguishers and appropriate Fire Risk Assessments (FRA) regularly reviewed.	2: Strategic Director (H&CS) / Assistant Director (SH&CS)		2. Service records, Fire extinguisher service records & records of FRA outcomes. External report (review of arrangements).	
			3. Quarterly Health & Safety inspections give attention to fire risks.	3: Respective Strategic / Assistant Directors.		3. Quarterly Health & Safety inspection records.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			4. Annual Capital Fire Safety Work Programme.	4: Strategic Director (H&CS) / Assistant Director (Social Housing and Community Safety)		4. Cabinet reports and Capital Projects Meeting Minutes.	
			5. Existing insurance policy documents.	5: Assistant Director (Finance)		5. Policy documents in place.	
			6. Internal audit of fire risk arrangements (completed February 2022).	6: Audit and Governance Manager (CMAP)		6. Internal Audit report.	
			7. Certified fire doors.	7: Strategic Director (H&CS) / Assistant Director (Social Housing and Community Safety)		7. Doors / Certification in place.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			8. Corporate review of Health and Safety arrangements (September 2025).	8: Strategic Director (PS)		8. SLT Report / minutes.	
			9. Town Hall fire prevention arrangements (including upgrade of door entry system).	9: Strategic Director (H&CS) / Assistant Director (Social Housing and Community Safety) / Health and Safety Manager		9.Monitored action plan in place / Updates to Fire Services	
			10. Implement periodic Audit report (CMAP) recommendations.	10: Health and Safety Manager		10.Audit action plan.	
			11. Act on appropriate recommendations arising from public enquiries / legislation changes (on-going).	11: Strategic Director (H&CS) / Assistant Director (Social Housing and Community Safety) / Health and Safety Manager		11.Reports / action plans.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			<b><u>Planned:</u></b>				
			1. Review and refresh Business Continuity Plans (2026/27).	1: Strategic / Assistant Directors			
			2. <b>Leasehold commercial properties</b> – review and establish landlord checks for structure / electrical / gas / fire safety and security of empty purchased properties pending redevelopment (2026/27).	2: Strategic Director (H&CS) / Assistant Director (Social Housing and Community Safety) / Assistant Director (Economy)			
			3. Review of corporate assets and associated operations (2026/27).	3: Strategic Director (H&CS) / Assistant Director (Social Housing and Community Safety)		3.Review findings / updated register / CET report.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
R29	Human Resources (HR) – failure to effectively manage workforce planning / comply with legislation and policies	Low / Serious <b>(GREEN)</b>	1.Advisory Conciliation and Arbitration Service (ACAS) code of practice and legislation.	1: People Services Manager	Low / Serious <b>(GREEN)</b>	1.Approved policies in place.	Chief Executive (Head of Paid Services) / PH R&CS / H&CR OSP
			2.Up-to-date HR policies and procedures subject to regular review and developed in consultation with trade unions.	2: People Services Manager		2.Regular alerts from designated bodies / Policies in place.	
			3.Appropriate training on HR policies and procedures.	3: People Services Manager		3.Training records.	
			4.Change Management Policy	4: People Services Manager / Service managers.		4.Management Team minutes.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			5. Periodic review of employee remuneration levels.	5: People Services Manager		5.Report to Remuneration Panel and Employee Committee.	
			6.Strategic Workforce Planning training undertaken.	6: People Services Manager / Assistant Directors.		6.Training records	
			7.Introduction of Human Resources and People Strategy (April 2026)	7: People Services Manager		7.Strategy in place	
			<b><u>Planned:</u></b>				
			1. Update of Business Continuity Plans - Trade Union reforms taking effect from April 2026 may increase the likelihood, frequency and duration of industrial action (2026/27).	1: People Services Manager		1.Business Continuity Plans.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
R30	Ombudsman Complaints (Local Government Ombudsman / Housing Ombudsman) – failure to meet customer expectation after completion of our complaints process	High / Low <b>(GREEN)</b>	1. Formal complaints policy and process.	1: Corporate Support and Data Compliance Manager	High / Low <b>(GREEN)</b>	1. Policy and procedure in place.	Strategic Director (CR) / PH Cabinet / H&CR, H&COM, E&L & BRP OSPs
			2. Designated support and compliance team in place.	2: Corporate Support and Data Compliance Manager		2. Designated manager / team in place.	
			3. Review / Final check of service area escalated responses.	3: Corporate Support and Data Compliance Manager		3. Review records retained.	
			4. Ombudsman monitoring by SLT (Strategic Performance Report).	4: SLT		4. Strategic Performance Report.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			5. Annual Ombudsman report to Scrutiny panel.	5: Corporate Support and Data Compliance Manager		5. FPS meeting minutes.	
			<b><u>Planned:</u></b>				
			1. Update complaints policy following regulatory changes (May 2026).	1: Chief Executive / Strategic Director (CR)		1. Updated policy in place.	
			2. Quarterly data compliance update report to SLT.	2: Corporate Support and Data Compliance Manager		2. SLT meeting minutes.	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
R 31	Modern Slavery and Human Trafficking – failure to effectively monitor and comply with legislation	Low /Major (GREEN)	1. Annual modern slavery statement (including policies and training).	1: Assistant Director (G&D) / People Services Manager	Low /Major (GREEN)	1. Cabinet minutes / Modern Slavery Statement Register.	Management Team / PH – R&CS / H&CR OSP
			2. Qualified officers in post (Human Resources & Procurement).	2: Assistant Director (Governance & Democracy) / People Services Manager		2. Officers in post.	
			3. Raising awareness with Elected Members.	3: Strategic Director (CR) / Assistant Director (Governance & Democracy)		3. Cabinet minutes / Corporate Governance Training.	
			4. Procurement procedures including Modern Slavery questions as part of the tender process – including contract terms and conditions.	4: Assistant Director (Governance & Democracy)		4. Contract procedure rules and monitoring and review of tender templates	

Risk Ref	Risk Description	Gross Risk	Mitigation Control Existing / Ongoing	Mitigation Owner	Net Risk / Status	Sources of Assurance	Risk Owner / Portfolio (PH) / OSP
			5. Specific Modern Slavery e-learning training module for senior officers.	5: People Services Manager		5. Training records.	