

# **Risk Management Update**

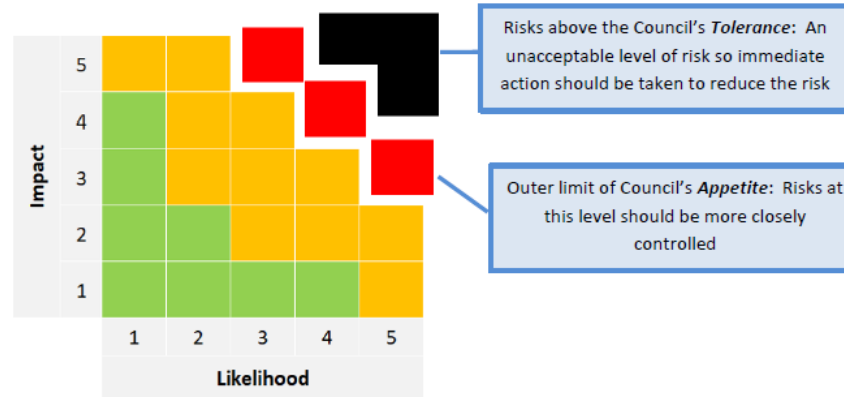
**June 2026**



## INTRODUCTION

A risk is a **potential future event that, if it materialises, effects the achievement of objectives**. Risk management is the process of identifying, measuring and responding to risks. These processes help to ensure that the Council achieves its corporate and service objectives by controlling risks in balance with resources. Good risk management also increases our ability to cope with developing and uncertain events and helps to instil a culture of continuous improvement and optimisation.

The Risk Management Framework sets out the Council's approach to managing corporate (strategic) and operational (service) risks. The Risk Management Framework also includes the Council's risk appetite statement, which articulates how much risk the Council is comfortable with and able to bear. The Council recognises that to achieve its objectives it must take risks, but that some risks are unacceptable (above our tolerance) and so action should be taken immediately to manage these risks. Risk appetite and tolerance are illustrated in the following matrix:



Risks are assessed for impact and likelihood using the following definitions to inform the assessment:

## Impact

| Level                   | Service                                                                        | Reputation                                                        | Wellbeing                                                                                                 | Legal/Compliance                                                                                                                                                                | Financial                                             | Strategic Objectives                        |
|-------------------------|--------------------------------------------------------------------------------|-------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|---------------------------------------------|
| <b>Catastrophic (5)</b> | Ongoing failure to provide an adequate service in a key area                   | Perceived as a failing authority requiring intervention           | Significant staff dissatisfaction, long term absence, or increased staff turnover including key personnel | Litigation almost certain and difficult to defend. Breaches of law punishable by imprisonment. Possible responsibility for death.                                               | Uncontrollable financial loss or overspend over £1.5m | Failure to deliver multiple key priorities  |
| <b>Major (4)</b>        | Key service areas disrupted 5+ days<br><br>Other service areas ongoing failure | Significant adverse national publicity                            | Adverse staff dissatisfaction, or increased absence and turnover of staff                                 | Litigation expected and uncertain if defensible. Breaches of law punishable by significant fines. Fails to prevent death, causes extensive permanent injuries or long term sick | Financial loss or overspend greater than £1m          | Failure to deliver key priority             |
| <b>Moderate (3)</b>     | Key service disruption 3-5 days<br><br>Other service disruption 7+ days        | Adverse national publicity of significant adverse local publicity | Declining staff satisfaction, or some loss of staff due to absence or turnover                            | Litigation expected but defensible. Breaches of law punishable by fines. Fails to prevent extensive permanent injuries or long term sick.                                       | Financial loss or overspend greater than £700k        | Unsatisfactory delivery of priorities       |
| <b>Minor (2)</b>        | Key service disruption 2 days<br><br>Other service disruption 2-7 days         | Minor adverse local publicity                                     | Short-term dissatisfaction, minor loss of staff due to absence or turnover                                | Complaint or litigation possible. Breaches of regulations or standards. Long term injuries or sickness.                                                                         | Financial loss or overspend greater than £100k        | Poor delivery of priorities                 |
| <b>Minimal (1)</b>      | Any service disruption 1+ day                                                  | Unlikely to cause adverse publicity                               | Loss of staff morale but unlikely to result in absence or turnover of staff                               | Unlikely to cause complaint. Breaches of local procedures.                                                                                                                      | Financial loss or overspend under £100k               | Minimal reduction in delivery of priorities |

## Likelihood

| Level                      | Probability | Description                                                                                                                                    |
|----------------------------|-------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Highly Probable (5)</b> | 80% +       | Without action is likely to occur; frequent similar occurrences in local government / Council history or anticipated within the next 6 months. |
| <b>Probable (4)</b>        | 60% - 80%   | Similar occurrences known often in local government / Council history or anticipated within the next 12 months.                                |
| <b>Possible (3)</b>        | 40% - 60%   | Similar occurrences experienced in local government / Council history or anticipated within the next 18 months.                                |
| <b>Unlikely (2)</b>        | 20% - 40%   | Not unheard-of occurrence in local government / Council history. Anticipated within the next 2 years.                                          |
| <b>Rare (1)</b>            | 0% - 20%    | Seldom occurs; no recent similar instances in local government / Council history.                                                              |

### Strategic Risks

- To ensure our current risk register reflects the current risks that could impact the achievement of the council's objects a review is undertaken periodically to determine if the strategic risks in place are up to date and fit for purpose.
- A review was undertaken in March and April 2026, by way of a survey to Members of the Policy and Resources Committee, the Audit Committee, Group Leaders and to officers of the Strategic Management Team. In addition to the survey some interviews with senior officers, the Leader and the Chairman of the Audit Committee were held. The survey and interviews were undertaken to capture the current views and concerns relating to the council's delivery and achievement of its objectives.
- Following on from the survey/interviews, a workshop was held with officers and members to discuss the views captured and establish if any of the existing risks needed to be reviewed, removed or new risks created.
- This session was well attended and received positive contribution. The session developed some new risks and re-framed some of the existing risks which are being presented in this report today.
- The Strategic Risk Register now contains 13 risks and are detailed below. This report captures the description, the causes, the impacts, the current controls in place to mitigate the risks and future planned actions. We have also captured the unmitigated and mitigated risk score.

### Future Consideration

- The new risks will continue to be reported on at regular intervals to the Policy and Resources Committee.
- An annual report will also continue to be presented to the Audit Committee
- Future reports will included updates on changes made to Strategic risks, and overview of the operational risks and any changes in risk ratings, in a dashboard style report.

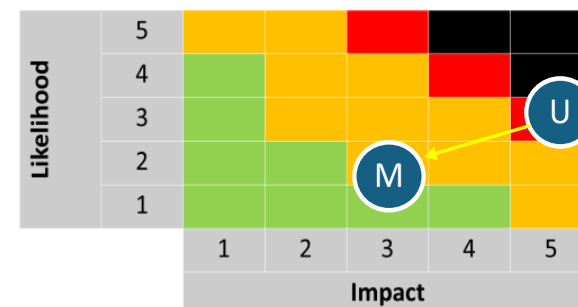
## Strategic Risk Descriptions

|    | Risk                                                                                                | Description                                                                                                                                                           |
|----|-----------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | Local Government Reorganisation                                                                     | Impact of Local Government Reorganisation results in lack of capacity to balance change in line with delivery of existing service                                     |
| 2  | Funding pressures                                                                                   | Funding Pressures prevent the council from balancing the budget or delivering services and capital projects.                                                          |
| 3  | Failure of suppliers                                                                                | Failure of supplier to deliver services as expected, through either a decline in supplier performance, national changes or global impacts                             |
| 4  | Failure of Partnerships                                                                             | Failure of partnerships to deliver services as expected or to remove or withdraw services resulting in impacts to the council                                         |
| 5  | Regulatory and Legislative compliance                                                               | Failing to comply with regulators or legislative compliance as required by the council.                                                                               |
| 6  | Failure to deliver Corporate Plan outcomes                                                          | Failure to deliver Corporate Plan outcomes as intended and agreed                                                                                                     |
| 7  | Failure to deliver statutory services                                                               | Failure to deliver the council's statutory services as required if resources are dissipated to non statutory projects or activities                                   |
| 8  | Cyber security                                                                                      | Cyber security attacks or breaches resulting in loss of IT, data or ability to deliver services.                                                                      |
| 9  | Inability to recruit / retain people / talent                                                       | Inability to recruit or retain staff and talent within the council leading to sub-optimal service delivery                                                            |
| 10 | Five-year housing plan does not meet the housing priorities and infrastructure needs of the borough | Five-year housing plan does not meet the housing priorities and infrastructure needs of the borough                                                                   |
| 11 | IT Failure / Business Continuity / Resilience                                                       | Unforeseen or unexpected disruption caused by an event outside of the council's control leads to the need to enact business continuity, emergency resilience actions. |
| 12 | Ineffective decision-making / inability to achieve consensus                                        | The Inability to achieve consensus or ineffective decision-making results in the council ceasing to function effectively                                              |
| 13 | Use and management of AI / new technologies                                                         | Opportunities lost or ineffective use of new technologies impact the council in a negative way.                                                                       |

## New risk register details

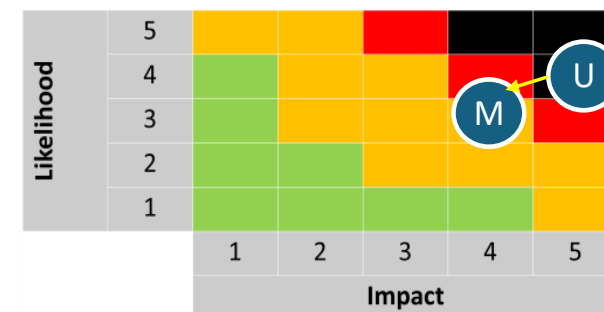
### 1 - Local Government Reorganisation – Larissa Reed

| No | Causes                                                                                                                                                                                                                                                                                                                                                                                                                                               | Impacts                                                                                                                                                                                                                                                                                                                                                                                    |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | <ul style="list-style-type: none"> <li>Uncertainty – geography / decision / timeframes</li> <li>Uncompetitive salary / reward package</li> <li>BAU pressures vs additional workload</li> <li>Secondments to support LGR work</li> <li>Internal skill gaps</li> <li>Shared service disaggregation</li> <li>Legal Challenge / Judicial Review</li> <li>Not being ready</li> <li>Shared Services – Loss of staff, due to greater uncertainty</li> </ul> | <ul style="list-style-type: none"> <li>Loss of people / unable to recruit</li> <li>Not safe and legal on day 1 requirements</li> <li>Failure to deliver BAU / Statutory services</li> <li>Miss opportunity to 'transform' – performance stands still or goes backwards</li> <li>Swale culture lost / swallowed up</li> <li>Reputation</li> <li>Loss of staff due to uncertainty</li> </ul> |



| No | Unmitigated                      | Current Controls                                                                                                                                                                                                                                                                                                                         | Mitigated                       | Actions                                                                                                                                                                                                                                                                                                 |
|----|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | Impact 5<br>Likelihood 3<br>(15) | <ul style="list-style-type: none"> <li>Internal LGR Board</li> <li>Good Kent Governance (workstream groups)</li> <li>Recruitment ongoing (Swale and next level)</li> <li>Skills / training programme for LGR (support programme)</li> <li>External networking and Peer support</li> <li>Work Streams / Priority Action groups</li> </ul> | Impact 3<br>Likelihood 2<br>(6) | <ul style="list-style-type: none"> <li>Programme development once geography / decision known</li> <li>Communication plan post decision (inc elections)</li> <li>Staff opportunities (secondments / tasks)</li> <li>Recruitment rounds</li> <li>Consideration of consultancy support / advice</li> </ul> |

## 2 – Funding Pressures – Lisa Fillery

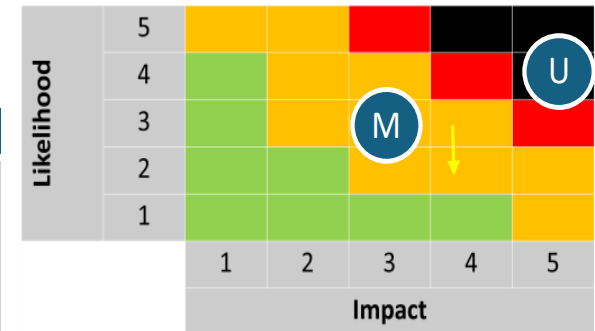


| No | Causes                                                                                                                                                                                                                                                                                                                                                                                                                         | Impacts                                                                                                                                                                                             |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2  | <ul style="list-style-type: none"> <li>Reduction in government funding</li> <li>Inflation higher than budget levels</li> <li>Increase in service demand</li> <li>Contract delivery failure</li> <li>Legislative changes increase costs</li> <li>Inability to make decisions regarding cost savings</li> <li>Lack of income generating opportunities</li> <li>Other agencies cutting their own provision of services</li> </ul> | <ul style="list-style-type: none"> <li>Reliance on reserves</li> <li>Need to further reduce discretionary spend</li> <li>Inability to deliver all statutory services</li> <li>Reputation</li> </ul> |

| No | Unmitigated                      | Current Controls                                                                                                                                                                                                                                                                                                                                                                                               | Mitigated                        | Actions                                                                                                                                                                                                                  |
|----|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2  | Impact 5<br>Likelihood 4<br>(20) | <ul style="list-style-type: none"> <li>Budget setting process</li> <li>Budget monitoring process</li> <li>MI / information shared and reviewed at KFO / CAG groups</li> <li>Use of consultants for advice</li> <li>Reserves strategy</li> <li>Income generation initiatives</li> <li>Reporting to EMT / Members</li> <li>Awareness of upcoming legislative changes</li> <li>Cost saving initiatives</li> </ul> | Impact 4<br>Likelihood 3<br>(12) | <ul style="list-style-type: none"> <li>Ongoing reviews (transformation)</li> <li>Continue BWG to agree budget for future years</li> <li>Savings plan to reduce budget gap</li> <li>Cut discretionary services</li> </ul> |

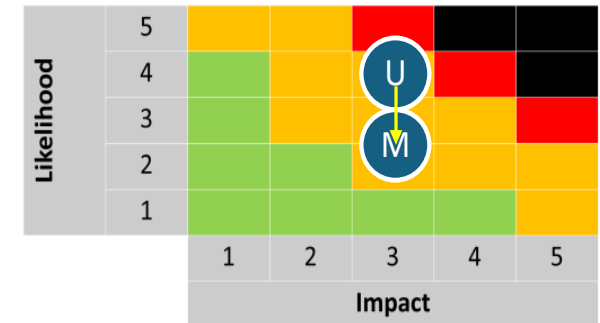
### 3 – Failure of Suppliers – Martyn Cassell

| No | Causes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Impacts                                                                                                                                                                                                                                                                                   |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3  | <ul style="list-style-type: none"> <li>Failure of procurement process</li> <li>Unachievable / Weak contractual specification</li> <li>Lack of contractual remedy</li> <li>Poor performance leads to non-delivery of service</li> <li>Financial difficulties of supplier</li> <li>Lack of investment in infrastructure/ labour shortage</li> <li>Global pressures (pandemic, fuel shortage, war, cost of materials)</li> <li>Change in political direction (national/local) leading to major service redesign</li> </ul> | <ul style="list-style-type: none"> <li>Service levels reduce</li> <li>Service(s) unavailable</li> <li>Resource to remediate</li> <li>Loss of revenue / additional costs</li> <li>Litigation / legal claims</li> <li>Reputation of the council</li> <li>Government intervention</li> </ul> |



| No | Unmitigated                    | Current Controls                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Mitigated                     | Actions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3  | Impact 5, likelihood 4<br>(20) | <ul style="list-style-type: none"> <li>Well developed specifications</li> <li>Robust procurement process</li> <li>Levels of governance / checks before contracts are agreed</li> <li>Financial / Credit checks / external references</li> <li>Penalty clauses related to service levels</li> <li>Contracts in place and effective contract monitoring procedures</li> <li>Regular dialogue with suppliers (including performance management)</li> <li>Contingency plans (BCP) for key suppliers (i.e. alternative / additional service providers who could step in)</li> <li>Use of contractual remedies such as recovery plans</li> <li>Regular communication with key members</li> <li>Annual reporting to relevant committees for scrutiny</li> <li>Regular internal oversight and governance reviews as necessary</li> </ul> | Impact 3, Likelihood 3<br>(9) | <ul style="list-style-type: none"> <li>Use emergency procurement mechanisms within legislation</li> <li>Contract negotiations, including potential variation</li> <li>Awareness of industry developments, best practice and national/global issues</li> <li>Regular engagement with other councils and Industry bodies for learning and peer support</li> <li>Support contractors to undertake new initiatives to resolve problems</li> <li>Corporate oversight and governance of contract management arrangements</li> </ul> |

## 4 – Failure of Partnerships – Emma Wiggins



| No | Causes                                                                                                                                                                                                                                                                                  | Impacts                                                                                                                                                                                                                             |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3  | Lack of communication between partners<br>Lack of clarity on roles and responsibilities within a TOR<br>Lack of ownership/accountability for delivery<br>Conflicting priorities<br>MOU/SLA not appropriate for managing delivery<br>failure/exit<br>Capacity issues within partnerships | Reputational damage<br>Failure to deliver<br>Failure to generate efficiencies<br>Failure to engage with diverse and experienced workforces<br>Erosion of trust (public/possible working partners)<br>Working relationship breakdown |

| No | Unmitigated                      | Current Controls                                                                                                                                                                                                                                                                                                                                 | Mitigated                       | Actions                                                                                                                                                                                                                          |
|----|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3  | Impact 3<br>Likelihood 4<br>(12) | - Appropriate and up to date TOR, MOU/SLA<br>- Good governance<br>- Joint planning and operational meetings<br>- Joint Communications plan<br>- Escalation routes for disagreement/issues arising<br>- Contingency plans for partnership exit or failure<br>- Regular monitoring and review – KPIs<br>- Options appraisal/value for money review | Impact 3<br>Likelihood 3<br>(9) | <ul style="list-style-type: none"> <li>Review of partnerships to consider LGR implications</li> <li>Assess local partnership opportunities post LGR</li> <li>Assess pending partnerships to consider LGR implications</li> </ul> |

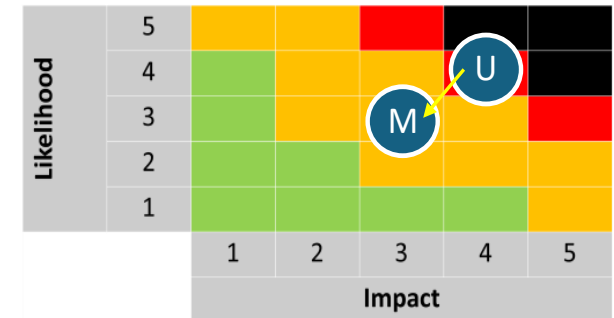
## 5 – Regulatory and Legislative Compliance – Larissa Reed

| No | Causes                                                                                                                                                                                                                                                                                                                                                                                                                | Impacts                                                                                                                                                                                                                     |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5  | <ul style="list-style-type: none"> <li>Lack of skills / knowledge</li> <li>Deliberate non-compliance</li> <li>Lack of awareness regarding current regulation / legislation</li> <li>Lack of awareness regarding changes to regulation / legislation</li> <li>Workload pressures</li> <li>AI</li> <li>Poor record keeping (lack of evidence)</li> <li>Lack of training</li> <li>Third party error / failure</li> </ul> | <ul style="list-style-type: none"> <li>Censure</li> <li>Fine / financial penalty</li> <li>Cost of remediation</li> <li>Special measures</li> <li>Injury / harm to colleague(s) / resident(s)</li> <li>Reputation</li> </ul> |

| Likelihood | 5 |        |   |   |   |   |
|------------|---|--------|---|---|---|---|
|            | 4 |        |   |   |   |   |
|            | 3 |        |   |   |   |   |
|            | 2 |        |   |   |   |   |
|            | 1 |        |   |   |   |   |
|            |   | 1      | 2 | 3 | 4 | 5 |
|            |   | Impact |   |   |   |   |

| No | Unmitigated                          | Current Controls                                                                                                                                                                                                                                                                            | Mitigated                           | Actions                                                                                                         |
|----|--------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|-----------------------------------------------------------------------------------------------------------------|
| 5  | Impact 4<br>likelihood 3<br><br>(12) | <ul style="list-style-type: none"> <li>Training</li> <li>Policy and procedures</li> <li>Regular audits</li> <li>Professional Forums (CPD)</li> <li>Advice from consultants / external advisers</li> <li>Professional Groups</li> <li>Member scrutiny</li> <li>Complaints process</li> </ul> | Impact 3<br>likelihood 1<br><br>(3) | <ul style="list-style-type: none"> <li>Ongoing Lobbying</li> <li>Testing scenario's / group projects</li> </ul> |

## 6 – Failure to deliver Corporate Plan – Lisa Fillery

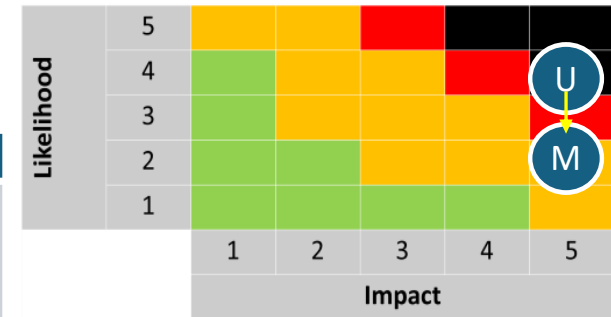


| No | Causes                                                                                                                                                                                                                                                                                                                                                                                                                             | Impacts                                                                                                                                                         |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6  | <ul style="list-style-type: none"> <li>Lack of clarity over priorities / actions</li> <li>Too many actions</li> <li>Lack of monitoring / oversight</li> <li>Funding pressures</li> <li>Funding diverted to statutory services</li> <li>Lack of focus on community requirements</li> <li>Insufficient scrutiny / challenge by Members</li> <li>Misinformation diverts focus</li> <li>Failure of partnership working (EW)</li> </ul> | <ul style="list-style-type: none"> <li>Not achieving meaningful delivery</li> <li>Reputation</li> <li>Inability to apply for/spend government grants</li> </ul> |

| No | Unmitigated                      | Current Controls                                                                                                                                                                                                                                                                                      | Mitigated                       | Actions                                                                                                                                                                                                                                     |
|----|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6  | Impact 4<br>Likelihood 4<br>(16) | <ul style="list-style-type: none"> <li>Scrutiny from / review with Members</li> <li>Oversight by committees (split out committees)</li> <li>Service planning process</li> <li>Annual Corporate plan reporting to P&amp;R (Steph)</li> <li>Agreement of the Annual Delivery Plan to P&amp;R</li> </ul> | Impact 3<br>Likelihood 3<br>(9) | <ul style="list-style-type: none"> <li>Review of Corporate Plan to consider LGR implications</li> <li>Community listening to inform priorities (SJ)</li> <li>Review Corporate Priorities</li> <li>Review of Annual Delivery Plan</li> </ul> |

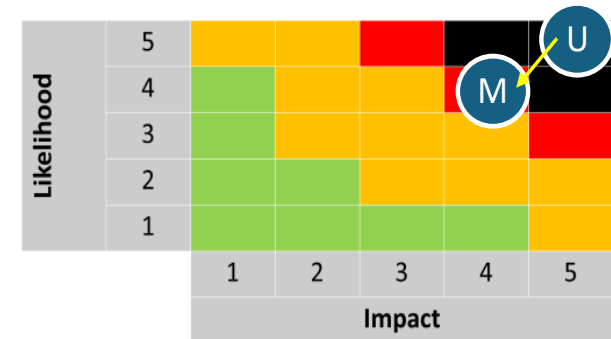
## 7 – Failure to deliver statutory services – Larissa Reed

| No | Causes                                                                                                                                                                                                                                                                                                                                        | Impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7  | <ul style="list-style-type: none"> <li>Changes in legislation or regulatory requirements</li> <li>Delays or pressures caused by central government policy changes</li> <li>Lack of clarity in service prioritisation under pressure</li> <li>Funding constraints</li> <li>Major emergency / pandemic / other staff limiting factor</li> </ul> | <ul style="list-style-type: none"> <li>Reduced service quality</li> <li>Backlogs in key services</li> <li>Regulatory intervention / legal challenge / enforcement action</li> <li>Fines, penalties or compensation</li> <li>Increased costs from reactive delivery</li> <li>Loss of public trusts</li> <li>Loss of member trusts</li> <li>Adverse media coverage</li> <li>Perceived as a failing authority</li> <li>Resources diverted away from transformation or discretionary services</li> <li>Increased workload and stress on staff</li> <li>Reduced morale</li> </ul> |



| No | Unmitigated                      | Current Controls                                                                                                                                                                                                                                                                                                                                                           | Mitigated                        | Actions                                                                                                                                                                               |
|----|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7  | Impact 5<br>likelihood 4<br>(20) | <ul style="list-style-type: none"> <li>Regular reporting to EMT</li> <li>Regular reporting to Committee</li> <li>Service planning and Corporate Plan</li> <li>Performance indicators monitoring</li> <li>Escalation procedures for service failure</li> <li>Business Continuity plans</li> <li>Partnership / contractor monitoring arrangements</li> <li>Audits</li> </ul> | Impact 5<br>Likelihood 2<br>(10) | <ul style="list-style-type: none"> <li>Internal and External audit as necessary</li> <li>Increased effective Member scrutiny and oversight over statutory service delivery</li> </ul> |

## 8 – Cyber security – Julie May

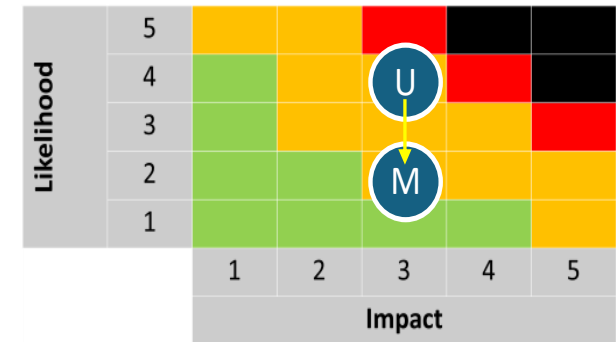


| No | Causes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8  | <ul style="list-style-type: none"> <li>Cloud hosted risk: Shifting from on premise infrastructure to cloud, increases dependency on data centres outside our environment.</li> <li>Unauthorised access or damage, or attempted attacks, on the network/computer systems (within the data centre and the cloud) including via harvesting user credentials, for malicious purposes (carried out by individuals, groups, or nations).</li> <li>Vulnerabilities in unpatched or insecure systems, inadequate password protection or general bad practices.</li> <li>A lack of staff awareness, and/or training and/or about cyber-attacks including phishing, ransomware leading to successful breaches/compromises</li> <li>Devices, systems or applications that have reached end of life, are no longer supported by vendors, or have not been updated in line with security best practice may become increasingly vulnerable to exploitation.</li> <li>Dependency on external suppliers: Reliance on third-party software providers for updates and management, which can lead to delays or security risks and supplier chain attacks.</li> <li>Staff non-compliance with Acceptable User Policy results poor practices that enable cyber attackers to harvest their user login details.</li> </ul> | <ul style="list-style-type: none"> <li>Service disruption: Any activity that could halt the delivery of all services, especially essential services.</li> <li>Financial impacts: loss of income, stolen money and the potential for ransom demands.</li> <li>Reputational damage</li> <li>Multiple risks to staff and residents if personal data hacked</li> <li>Data compromise: Loss of sensitive or critical data could lead to breaches of privacy and legal repercussions as well as loss of organisational history and decision making</li> <li>Increased exposure to high risk vulnerabilities that cannot be patched.</li> <li>Potential for data breaches, operational disruption, or downtime across multiple services.</li> <li>Inability to meet compliance requirements such as PSN or Cyber Essentials.</li> <li>Reduced capacity to maintain operational services, resolve incidents, or progress key ICT projects.</li> <li>Loss of specialist knowledge, leading to delays, errors, or increased risk of system outages or vulnerabilities.</li> <li>Reduced resilience during major incidents, impacting recovery time.</li> <li>Lower service performance, slower response times, and potential impact on statutory or cross-council commitments.</li> <li>Despite significant investment in counter-measures even a moderate breach could lead to several days outage across all sites. Possibility that partners could face large ransom demands if backups are compromised and/or reputational damage.</li> </ul> |

## 8 – Cyber security 2 – Julie May

| No | Unmitigated                          | Current Controls                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Mitigated                            | Actions                                                                                                                                                                                                                                                                                                                          |
|----|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8  | Impact 5<br>Likelihood 5<br><br>(25) | <ul style="list-style-type: none"> <li>Disaster recovery plan</li> <li>Regular Backup Programme</li> <li>Comprehensive Business Continuity Plans to ensure recovery and minimum service disruption</li> <li>IT Security Policy</li> <li>Boxphish Cyber security training mandatory and undertaken via ELMs</li> <li>Nessus scanning software in now fully deployed and reporting daily on system vulnerabilities</li> <li>Endpoint Compliance Policies for laptops, mobiles and Bring Your Own Device</li> <li>Enhanced M365/Azure Backup Protection</li> <li>Enhanced Multi Factor Authentication user experience - Adopting secure methods (Phone App)</li> <li>Annual IT health check for Public Service Network Accreditation (PSN)</li> <li>Review of third-party software products via DPIAs</li> <li>Advanced firewalls, real-time monitoring systems, and multi-layered next generation Anti Virus Software</li> <li>Clear and enforceable policies covering access to systems, password management</li> <li>Communication plans for internal and external communication during incidents</li> <li>Cyber Essentials Accreditation</li> <li>Review of existing security products to align with industry standards</li> <li>MFA mandated for all staff and applied to all staff user accounts.</li> <li>Configure one-time passcodes for MFA resets.</li> <li>Managed SOC Services (Kiphu)</li> </ul> | Impact 4<br>Likelihood 4<br><br>(16) | <ul style="list-style-type: none"> <li>Enforce MFA in all locations (included trusted locations)</li> <li>Simulated Phishing and Awareness campaign continuing</li> <li>Ongoing programme of awareness raising through Cyber events, training and tests</li> <li>Regular Cyber incident Business Continuity Exercises</li> </ul> |

## 9 – Inability to recruit / retain people/talent – Bal Sandher

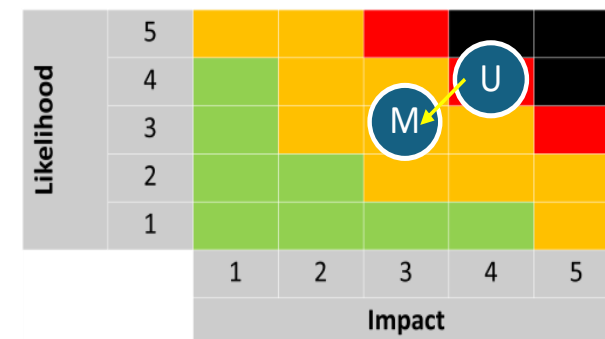


| No | Causes                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9  | <ul style="list-style-type: none"> <li>Pay constraints – uncompetitive salary/reward package</li> <li>Seen as less innovative, less career progression and development, and less flexibility than private sector</li> <li>Public scrutiny and political environment deter candidates</li> <li>Limited employer branding efforts</li> <li>Uncertainty as a result of LGR</li> <li>Acknowledged 'hard to recruit' roles (professionalisms/highly skilled roles)</li> </ul> | <ul style="list-style-type: none"> <li>Reduced service quality &amp; delays</li> <li>Increased reliance on agency staff causing inconsistency</li> <li>Loss of institutional knowledge</li> <li>Higher costs due to Agency/Consultant spend and failed recruitment cycles</li> <li>Inefficiencies from under-resourcing</li> <li>Increased workload for remaining staff</li> <li>Lower morale and engagement</li> <li>Higher sickness absence and stress/mental health</li> <li>Reduced ability to deliver transformation programmes</li> <li>Slower adoption of digital innovation</li> <li>Governance and compliance risks (skills gaps in key roles)</li> <li>Reputational risk if the Council is not seen as a good place to work</li> </ul> |

## 9 – Inability to recruit / retain people/talent – Bal Sandher

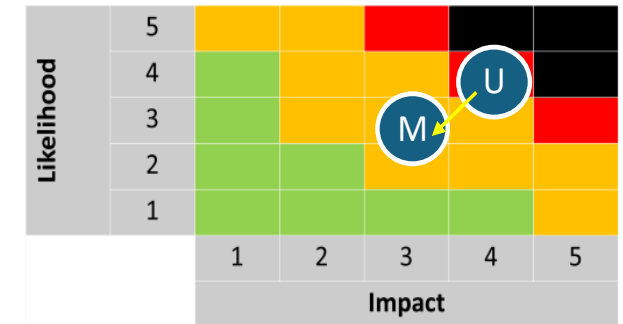
| No | Unmitigated                          | Current Controls                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Mitigated                           | Actions                                                                                                                                                                                                                                                                                                                                 |
|----|--------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9  | Impact 3<br>Likelihood 4<br><br>(12) | <ul style="list-style-type: none"> <li>• Workforce strategy monitoring &amp; reporting</li> <li>• Training &amp; development programme to increase skill levels</li> <li>• Occupational health, employee support and wellbeing programmes, HSE stress survey</li> <li>• Recruitment process includes ability to adjust pay and market supplement for hard to recruit jobs</li> <li>• Rewards package reviewed regularly</li> <li>• Commissioning specialist external support as required</li> <li>• Use of ClearReview to encourage continuous conversations and clear objectives</li> <li>• Hybrid Policy and service review of hybrid arrangements</li> <li>• Graduates site created and career grades used for staff progression</li> <li>• Apprenticeship schemes &amp; professional qualifications offered</li> <li>• Review of exit interview on reasons for leaving</li> <li>• Monitor and review the online onboarding for new staff</li> <li>• Annual market supplement reviews and job evaluation schemes</li> <li>• Targeted campaigns</li> <li>• Sponsor License held</li> <li>• Regular engagement surveys with action plans</li> </ul> | Impact 3<br>Likelihood 2<br><br>(6) | <ul style="list-style-type: none"> <li>• Simplify &amp; improve candidate experience, particularly in relation to web recruitment</li> <li>• Identify critical roles and future skills need through Kent HR workstream and develop succession planning</li> <li>• Increase investment in skills for all staff to support LGR</li> </ul> |

## 10 – Lack of Five-Year Housing Land Supply and/or out-of-date Local Plan negatively impacts development and infrastructure needs within the borough – Joanne Johnson



| No | Causes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10 | <ul style="list-style-type: none"> <li>Lack of skills, knowledge and resource to develop and maintain an up to date and robust Local Plan.</li> <li>Political and public pressure through engagement stalls development of the plan.</li> <li>Lack of timely engagement from statutory consultees, prior to 31.12.26 deadline (before new Local Plan system must be adhered to).</li> <li>National policy/methodology changes (NPPF) mean existing work on the plan will have to be amended if 31.12.26 timeframe breached.</li> <li>Allocated sites are unsuitable or unavailable.</li> <li>Developers not building out in line with planned/agreed targets.</li> <li>Procedural issues (eg agreeing S106 documentation)</li> <li>Lengthy appeals leading to delays.</li> </ul> | <ul style="list-style-type: none"> <li>The Council fails to have an up to date, robust Local Plan in place</li> <li>The Council is vulnerable to inappropriate and speculative development</li> <li>National presumption in favour of sustainable development leads to speculative applications and greater risks of appeal.</li> <li>Fewer houses delivered than Government assessed need.</li> <li>Infrastructure coming forward piecemeal rather than in a strategic fashion.</li> </ul> |

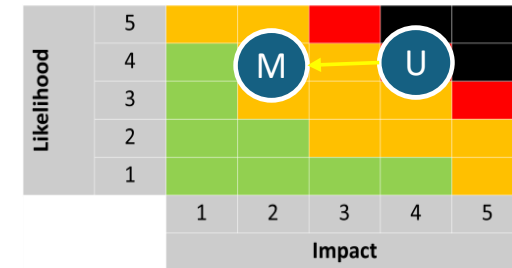
# 10 – Lack of Five-Year Housing Land Supply and/or out-of-date Local Plan negatively impacts development and infrastructure needs within the borough – Joanne Johnson



| No | Unmitigated                          | Current Controls                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Mitigated                           | Actions                                                                                                                                                                                                                                                                                                                                                                                                 |
|----|--------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10 | Impact 4<br>Likelihood 4<br><br>(16) | <ul style="list-style-type: none"> <li>Provision of a sound evidence base to support the delivery of a new Local Plan in line with the agreed Local Development Scheme.</li> <li>Ensure members and officers are up to date with key regulation and legislation changes.</li> <li>5YHLS figure to be robustly reviewed at appropriate (annual) update opportunities.</li> <li>Interim staff being used to fill vacancies in planning as required, and to cover peaks in workload.</li> <li>Agility in member/governance process across PTPWG, P&amp;R and Full Council (without loss of oversight)</li> <li>Additional budget sought and approved from National Government</li> <li>Horizon scanning for funding opportunities for Local Plan process and infrastructure</li> <li>Robust HELAA processes ensure understanding of suitable land supply</li> </ul> | Impact 3<br>Likelihood 3<br><br>(9) | <ul style="list-style-type: none"> <li>Refinement of 'statement of common ground' process for major development sites</li> <li>Working with Government to unblock/speed up stalled sites via the New Homes Accelerator Unit</li> <li>Recruitment drives and development of 'grow our own' approach</li> <li>Strategic working with statutory infrastructure providers to optimise S106 spend</li> </ul> |

## 11 – IT Failure / Business Continuity / Resilience – Stephanie Curtis

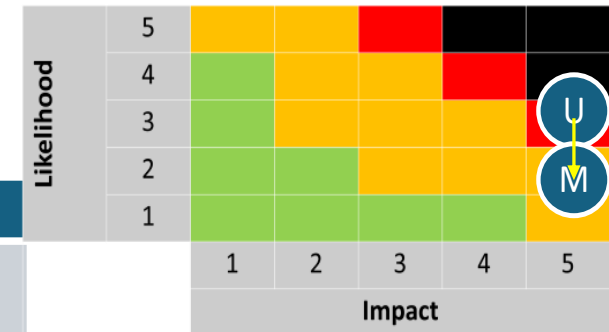
| No | Causes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Impacts                                                                                                                                                                                                                      |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 11 | <ul style="list-style-type: none"> <li>Power outage</li> <li>Hardware not working (servers/computers)</li> <li>Staffing issues (absence/turnover/failure to recruit)</li> <li>Human error</li> <li>Software issues/upgrades</li> <li>Major incident</li> <li>Outdated BCPs</li> <li>Unclear responsibilities</li> <li>Skills gaps in critical areas</li> <li>Overly complex BCPS</li> <li>BCPs not being tested</li> <li>Lack of awareness for BCPs</li> <li>Lack of staff in dedicated BCP/Resilience roles for a critical incident (shared service – maybe dealing with an incident in another area)</li> </ul> | <ul style="list-style-type: none"> <li>Not being able to deliver statutory services</li> <li>Reputational damage</li> <li>Data loss</li> <li>Financial loss</li> <li>Delayed or partial recovery from an incident</li> </ul> |



| No | Unmitigated                                           | Current Controls                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Mitigated                                            | Actions                                                                                                                                                                              |
|----|-------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 11 | <b>Impact 4</b><br><b>Likelihood 4</b><br><b>(16)</b> | <ul style="list-style-type: none"> <li>Enhanced back up - M365/Azure Back up Protection</li> <li>Ability to locate devices</li> <li>Regular back up programmes</li> <li>Appropriate planning and training for Business Continuity</li> <li>Specialist BC/Resilience Team now offering shared service between MBC/SBC</li> <li>Membership of Kent Resilience Forum and Local Authority Resilience Agency (LARA)</li> <li>Robust BCP plans that periodically reviewed</li> <li>BCPs appropriately tested</li> <li>Special interest group incentives for recruitment</li> <li>Clearly defined roles/responsibilities for BC/Resilience staff</li> </ul> | <b>Impact 2</b><br><b>Likelihood 4</b><br><b>(8)</b> | <ul style="list-style-type: none"> <li>Possible mandatory BC/Resilience responsibilities added to job roles</li> <li>Ongoing resilience and business continuity exercises</li> </ul> |

## 12 – Ineffective decision-making / inability to achieve consensus

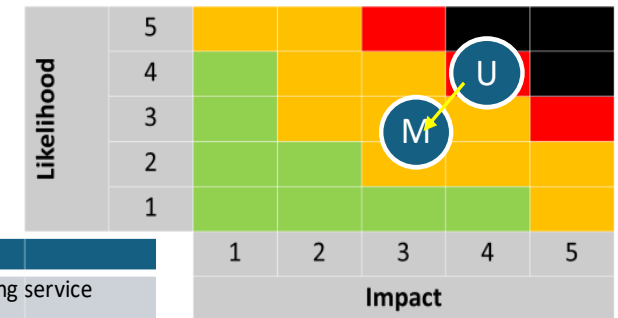
– Larissa Reed



| No | Causes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12 | <ul style="list-style-type: none"> <li>Lack of clearly defined decision-making (governance) processes or inconsistent application</li> <li>Lack of clarity on roles and responsibilities between members and officers</li> <li>Weak alignment between Member decisions and Corporate plan priorities</li> <li>Political differences or instability leading to lack of consensus</li> <li>Lack of trusts or ineffective communications</li> <li>Decisions taken without robust data, analysis or evidence base</li> <li>Limited time for effective debate and scrutiny</li> <li>Skills gaps in strategic decision-making</li> <li>LGR creating uncertainty</li> <li>External pressures requiring quick decisions</li> </ul> | <ul style="list-style-type: none"> <li>Failure to deliver Corporate plan priorities</li> <li>Delays in implementing major projects or transformation</li> <li>Ineffective or inconsistent service delivery due to unclear direction</li> <li>Resources diverted to low-priority or unplanned activities</li> <li>Increased risk of poor or unlawful decisions</li> <li>Inefficient use of resources due to poor decisions</li> <li>Increased costs from re-work, delays or reversal of decisions</li> <li>Confusion over priorities and responsibilities</li> <li>Reduced staff morale / disengagement</li> </ul> |

| No | Unmitigated                      | Current Controls                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Mitigated                        | Actions                                                                                                                                                                                                                                                                                                                 |
|----|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12 | Impact 5<br>Likelihood 3<br>(15) | <ul style="list-style-type: none"> <li>Constitution and formal decision-making framework</li> <li>Committee structure with defined roles and responsibilities</li> <li>Strong officer support</li> <li>Corporate Plan and Annual Delivery Plan</li> <li>Use of business cases and impact assessments for key decisions</li> <li>Overview and Scrutiny function providing independent challenge</li> <li>Member induction</li> <li>Leadership development programmes for senior officers</li> <li>Coaching for Members</li> </ul> | Impact 5<br>likelihood 2<br>(10) | <ul style="list-style-type: none"> <li>Cross-party or informal discussions to build consensus</li> <li>Ongoing Member training</li> <li>Leadership development programmes for members</li> <li>Introduce clear criteria for motions</li> <li>Strengthen decision making guidance (what does good look like?)</li> </ul> |

## 13 – Use and management of AI / new technologies – Lisa Fillery



| No | Causes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 13 | <ul style="list-style-type: none"> <li>Lack of clear corporate policy or appetite for AI adoption</li> <li>Inconsistent application of AI policy across services</li> <li>Use of AI tools with access to personal data without appropriate controls</li> <li>Unclear data retention and storage requirements</li> <li>Poor data quality leading to unreliable AI outputs</li> <li>Lack of staff understanding of AI limitations and risks</li> <li>Insufficient training in ethical, lawful and safe AI use</li> <li>Over reliance on AI outputs without appropriate human review</li> <li>Procurement of AI-enabled systems without Information governance involvement</li> <li>Use of unauthorised AI tools outside of corporate controls, including the input of Council-held personal or confidential data into such tools</li> <li>Lack of transparency or detail in AI-assisted decision</li> <li>Absence of a central register or inventory of AI systems in use</li> <li>Lack of clearly defined and approved AI use cases across services</li> <li>Failure to consider or update privacy notices where AI introduces new or expanded processing</li> <li>Lack of ongoing monitoring or oversight of how AI tools are used in practice</li> </ul> | <ul style="list-style-type: none"> <li>Poor / inappropriate decision-making affecting service outcomes</li> <li>Reduced quality or consistency in service delivery</li> <li>Breach of data protection legislation</li> <li>Misuse of personal data</li> <li>Regulatory intervention or challenge</li> <li>Financial loss from errors, procurement issues or legal claims</li> <li>Inefficient investment in inappropriate or ineffective technologies</li> <li>Loss of public trust due to misuse of AI or perceived “unsafe” decisions</li> <li>Negative media coverage</li> <li>Weak audit trail for decisions supported by AI</li> <li>Inability to demonstrate transparency or accountability</li> <li>Staff misuse or inappropriate reliance on AI tools</li> <li>Reduced professional judgement or skill erosion over time</li> <li>Failure to uphold individuals’ rights, including the right to obtain human intervention and challenge decisions</li> <li>Unlawful automated decision making leading to ICO enforcement action</li> <li>Breach of the Public Sector Equality Duty arising from biased or discriminatory AI outcomes</li> <li>Failure to retain or retrieve AI-generated information in line with FOI/EIR obligations</li> <li>Use of AI leading to further processing of personal data beyond its original purpose, without a valid lawful basis</li> </ul> |

## 13 – Use and management of AI / new technologies – Lisa Fillery

| No | Unmitigated                          | Current Controls                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Mitigated                           | Actions                                                                                                                                                                                                                                                                                                                                                            |
|----|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 13 | Impact 4<br>Likelihood 4<br><br>(16) | <ul style="list-style-type: none"> <li>Corporate AI Policy in place</li> <li>DPIA for AI use involving personal data</li> <li>Monitoring and reporting of breaches or incidents</li> <li>Staff to undertake required training before being able to use AI tools</li> <li>Restrictions on users and use of AI</li> <li>Maintenance of a central register of approved AI systems (currently including corporate tools such as Copilot)</li> <li>Provision of approved use case examples and guidance to support appropriate AI use</li> <li>Annual review of privacy notices and processing activities to identify and capture AI-related processing, including updates to the privacy register where applicable</li> <li>Controlled allocation of AI licences, including defined use and user acknowledgement of acceptable use</li> </ul> | Impact 3<br>Likelihood 3<br><br>(9) | <ul style="list-style-type: none"> <li>Guidance published on acceptable use and risks of AI</li> <li>Data quality standards</li> <li>Controls on procurement</li> <li>Further develop and expand the Central AI register as adoption increases</li> <li>Develop a consistent approach to recording and evidencing how AI tools are used across services</li> </ul> |