

Subject:	Strategic Risk Focus Report: SR36, SR23 and SR21		
Date of Meeting:	28th September 2021		
Report of:	Executive Lead Officer, Strategy, Governance & Law		
Contact Officer:	Name:	Kat Brett	Tel: 01273 293846
	Email:	Kat.Brett@brighton-hove.gov.uk	
Ward(s) affected:	All		

FOR GENERAL RELEASE**1. PURPOSE OF REPORT AND POLICY CONTEXT**

- 1.1 To report to the Audit & Standards Committee on the latest quarterly update to the city council's Strategic Risk Register (SRR).
- 1.2 The Committee have agreed to focus on at least two strategic risks (SRs) at each of their meetings. For this meeting there are three SRs risks to receive focus and to enable Members' questions to be asked there will be attendance by Risk Owners as detailed below:

The Executive Director, Economy, Environment & Culture (ED EEC) in respect of:

SR36 Not taking all actions required to address climate and ecological change and transitioning our city to carbon neutral by 2030.

SR23 Unable to develop and deliver an effective Regeneration and Investment Strategy for the seafront and ensure effective maintenance of the seafront infrastructure.

The Executive Director, Housing, Neighbourhoods & Communities (ED HNC) in respect of:

SR21 Unable to manage housing pressures and deliver new housing supply.

2. RECOMMENDATIONS:

That the Audit & Standards Committee:

- 2.1 Note the SRR detailed within [Table 1](#) of this report.
- 2.2 Note [Appendix 1](#) the CAMMS Risk report with details of the three SRs and actions taken ('Existing Controls') and actions planned.
- 2.3 Note [Appendix 2](#) which provides:
 - i. a guide on the risk management process;

- ii. guidance on how Members might want to ask questions of Risk Owners, or officers connected to the strategic risks; and
 - iii. details of opportunities for Members, or officers, to input on Strategic Risks at various points and levels.
- 2.4 Make recommendations for further action(s) to the relevant council body.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 The city council’s SRs are reviewed quarterly by the Executive Leadership Team (ELT) taking on board comments from quarterly risk reviews carried out at Directorate Management Teams. This process ensures the currency of the city council’s SRR.
- 3.2 The Audit & Standards Committee has a role to monitor and form an opinion on the effectiveness of risk management and internal control.
- 3.3 The initial risk score takes account of the existing controls in place to mitigate the risk (current score). The revised risk score assumes that all risk actions are successfully delivered (target score). The ‘likelihood’ score ranges from Almost Impossible (1) to Almost Certain (5) and the ‘impact’ score ranges from Insignificant (1) to Catastrophic (5). These scores are multiplied to give the risk score.
- 3.4 At ELT’s review of the SRR on 14 July 2021 no risks were removed, no new risks were proposed or agreed. There remain 16 Strategic Risks. There were no changes to the Strategic Risk Register.

The risk heat map and Table 1, below, shows the current 16 Strategic Risks in the highest Revised Risk order which takes account of future actions to reduce or mitigate the risks.

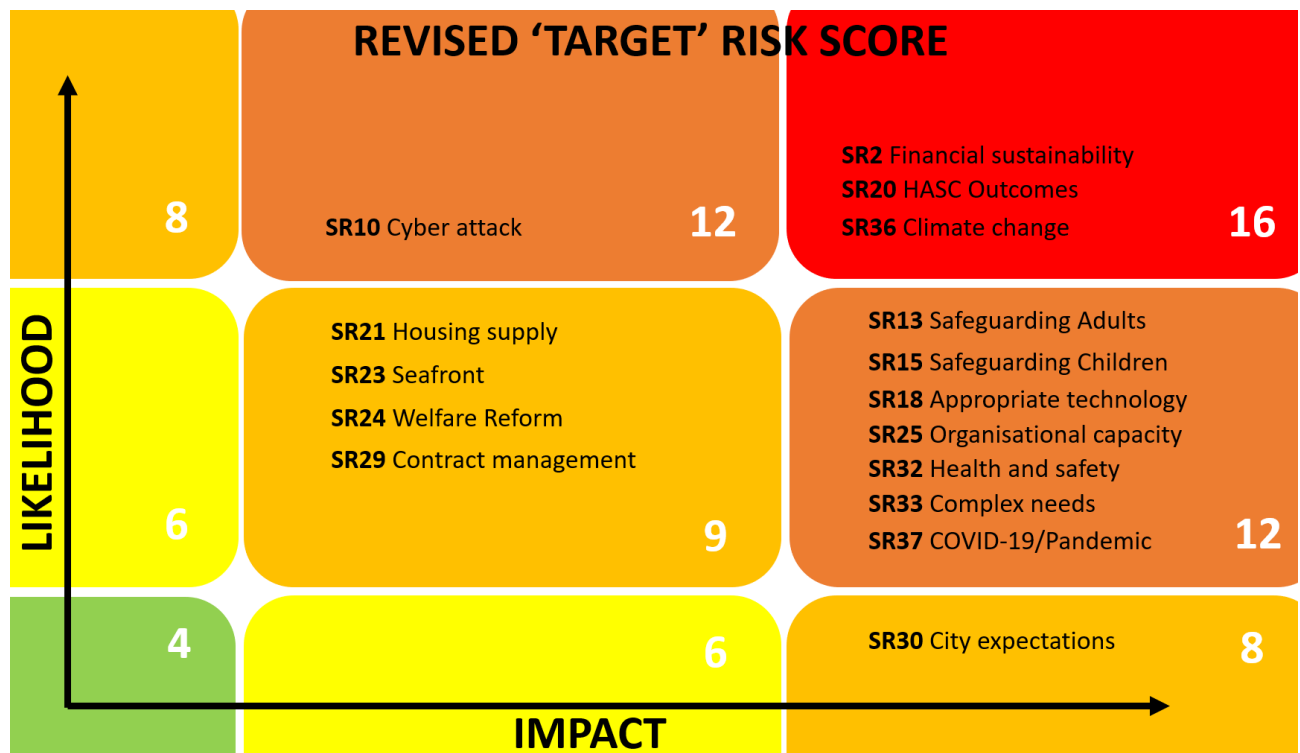


































TABLE 1

Risk Nos.	Risk Title	Initial Risk Score Likelihood (L) x Impact (I) & Direction of Travel (DOT)	Revised Risk Score Likelihood (L) x Impact (I) & Direction of Travel (DOT)	Committee (s)	Risk Owner
SR 2	The Council is not financially sustainable	5 x 4 ◀▶  RED	4 x 4 ◀▶  RED	Policy & Resources Committee	Acting Chief Finance Officer
SR 36	Not taking all actions required to address climate and ecological change and transitioning our city to carbon neutral by 2030	5 x 4 ◀▶  RED	4 x 4 ◀▶  RED	Environment, Transport & Sustainability Committee	Executive Director, Economy, Environment & Culture
SR 20	Failure to achieve health and social care outcomes due to organisational and resource pressures on the Clinical Commissioning Group (CCG) and Brighton & Hove City Council (BHCC)	5 x 4 ◀▶  RED	4 x 4 ◀▶  RED	Health & Wellbeing Board	Executive Director, Health & Adult Social Care
SR 37	Not effectively responding to and recovering from COVID-19 in Brighton and Hove including building resilience for future pandemics	4 x 4 ◀▶  RED	3 x 4 ◀▶  AMBER	Health & Wellbeing Board and Policy & Resources (Recovery) Sub- Committee	Executive Director, Health & Adult Social Care
SR 32	Challenges to ensure health & safety measures lead to personal injury, prosecution, financial losses and reputational damage	4 x 4 ◀▶  RED	3 x 4 ◀▶  AMBER	Policy & Resources Committee	Assistant Director Human Resources & Organisational Development
SR 33	Not providing adequate housing and support for people with significant and complex needs	4 x 4 ◀▶	3 x 4 ◀▶	Health & Wellbeing Board and	Executive Director, Health & Adult Social Care

Risk Nos.	Risk Title	Initial Risk Score Likelihood (L) x Impact (I) & Direction of Travel (DOT)	Revised Risk Score Likelihood (L) x Impact (I) & Direction of Travel (DOT)	Committee (s)	Risk Owner
		 RED	 AMBER	Housing Committee	
SR 18	The organisation is unable to deliver its functions in a modern, efficient way due to the lack of appropriate technology	4 x 4 ◀▶  RED	3 x 4 ◀▶  AMBER	Policy & Resources Committee	Assistant Director Human Resources & Organisational Development
SR25	Insufficient organisational capacity or resources to deliver all services as before and respond to changing needs and changing circumstances	4 x 4 ◀▶  RED	3 x 4 ◀▶  AMBER	Policy & Resources Committee	Chief Executive
SR 13	Not keeping vulnerable adults safe from harm and abuse	4 x 4 ◀▶  RED	3 x 4 ◀▶  AMBER	Health & Wellbeing Board	Executive Director, Health & Adult Social Care
SR 15	Not keeping children safe from harm and abuse	4 x 4 ◀▶  RED	3 x 4 ◀▶  AMBER	Children, Young People & Skills Committee	Executive Director Families, Children & Learning
SR 10	Corporate information assets are inadequately controlled and vulnerable to cyber attack	4 x 4 ◀▶  RED	4 x 3 ◀▶  AMBER	Policy & Resources Committee	Chief Executive
SR 21	Unable to manage housing pressures and deliver new housing supply	4 x 4 ◀▶  RED	3 x 3 ◀▶  AMBER	Housing Committee	Executive Director, Housing,

Risk Nos.	Risk Title	Initial Risk Score Likelihood (L) x Impact (I) & Direction of Travel (DOT)	Revised Risk Score Likelihood (L) x Impact (I) & Direction of Travel (DOT)	Committee (s)	Risk Owner
		RED	AMBER		Neighbourhoods & Communities
SR 24	In the context of Covid-19 the needs and demands for services arising from the changing and evolving landscape of welfare reform is not effectively supported by the council	4 x 3 ◀▶  AMBER	3 x 3 ◀▶  AMBER	Policy & Resources Committee	Acting Chief Finance Officer
SR 23	Unable to develop and deliver an effective Regeneration and Investment Strategy for the seafront and ensure effective maintenance of the seafront infrastructure	3 x 4 ◀▶  AMBER	3 x 3 ◀▶  AMBER	Environment, Transport & Sustainability Committee and Tourism, Equalities, Communities & Culture Committee	Executive Director, Economy, Environment & Culture
SR 29	Ineffective contract performance management leads to sub-optimal service outcomes, financial irregularity and losses, and reputational damage	3 x 4 ◀▶  AMBER	3 x 3 ◀▶  AMBER	Policy & Resources Committee	Acting Chief Finance Officer
SR 30	Not fulfilling the expectations of residents, businesses, government and the wider community that Brighton & Hove City Council will lead the city well and be stronger in an uncertain environment	3 x 4 ◀▶  AMBER	2 x 4 ◀▶  AMBER	Policy & Resources Committee	Chief Executive

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 Through consultation with ELT the Risk Management process currently in operation was deemed to be the most suitable model.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 This is an internal risk reporting process and as such no engagement or consultation has been undertaken in this regard.

6. CONCLUSION

- 6.1 The council must ensure that it manages its risks and meets its responsibilities and deliver its Corporate Plan, risk management is evidence for good governance.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 For each Strategic Risk there is detail of the actions already in place ('Existing Controls') or work to be done as part of business or project plans ('Risk Actions') to address the strategic risk. Potentially there may have significant financial implications for the authority either directly or indirectly. The associated financial risks are considered during the Targeted Budget Management process and the development of the Medium Term Financial Strategy

Finance Officer Consulted: Jeff Coates

Date: 17/08/2021

Legal Implications:

- 7.2 All Strategic Risks which are reported to the Audit & Standards Committee may potentially have legal implications. Members are referred to Appendix 1 of this Report for the detailed description (a description which normally makes reference to any legal implications of a direct nature) provided of the Strategic Risks being focused on in this Committee cycle.
- 7.3 The Council has delegated to its Audit & Standards Committee its powers and duties in relation to risk management, and as a result, this is the correct body for considering this Report.

Lawyer Consulted: Victoria Simpson

Date: 19/08/2021

Equalities Implications:

- 7.4 Risk owners are requested to ensure that equalities implications are considered in describing strategic risks, their potential consequences and when developing mitigating actions. This will be part of regular ELT & DMT risk review sessions.

Sustainability Implications:

- 7.5 SR36 has a key focus on sustainability. There are additional strategic risks, such as SR23 and SR21, which have sustainability implications. Risk owners will be requested to continue considering sustainability implications and this will also be part of regular ELT & DMT risk review sessions.

Any Other Significant Implications:

- 7.6 None.

SUPPORTING DOCUMENTATION



Appendices:

1. Appendix 1: CAMMS Risk report SR36, SR23 and SR21.
2. Appendix 2: A guide on the risk management process and how Members might want to ask questions of Risk Owners in relation to Strategic Risks.

Background Documents

1. None.

APPENDIX 1: CAMMs Risk Report for SR36, SR23, SR21

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Eff. of Control
SR36	Not taking all actions required to address climate and ecological change and transitioning our city to carbon neutral by 2030.	Executive Director Economy, Environment & Culture	BHCC Strategic Risk	Aug-21	Threat	Treat	 L5 x I4	 L4 x I4	Revised: Uncertain

Causes

Link to Corporate Plan 2020-23. Outcome 5 'A sustainable City', action 5.1 'Become a carbon neutral city by 2030'

The climate is warming and studies recommend that actions must be taken to keep global warming to under 1.5 degrees to avoid negative catastrophic impacts on biodiversity and the ecology of the planet.

Potential Consequence(s)

If this is not addressed local impacts are:

Sea-level rise impacting Brighton & Hove as a coastal city

Coastal protections challenged by sea level rise affecting city roads, homes and the coastline

Increasing local flooding due to extreme weather events and prolonged periods of heavy rainfall, inefficiencies in our urban infrastructure and built environment

Water shortage

Crop failure and food insecurity

Depletion or threat to local species and their natural habitats

Ocean acidification

Disproportionate impact upon groups suffering inequality

Impact on public health due to increased temperatures

Existing Controls

First Line of Defence - Management Actions

1. The Net Zero Carbon Strategy was developed, and launched in 2021.

2. Brighton & Hove is part of the UNESCO biosphere designated area with biodiversity plan overseen by the biosphere delivery board who meet three times p.a. As at January 2020 the delivery board is chaired by Martin Harris CEO of Brighton & Hove buses, the deputy chair is Sean Ashworth of Inshore Fisheries Conservation Authority (IFCA).

3. BHCC, the Brighton & Hove Economic Partnership and the Chamber of Commerce have agreed an economic strategy which includes creating a sustainable city and moving towards a circular economy as a core objective

4. BHCC owns 12,000 acres of downland and agricultural farmland surrounding the city and works in partnership with Southern Water and the South Downs National Park Authority on initiatives to protect the chalk aquifer and city water supply
5. BHCC and the Transport Partnership work together to deliver sustainable transport policies through the delivery of the Local Transport Plan (LTP).
6. Flood and Coastal Erosion risk management - Brighton Marina to River Adur coastal protection scheme undertaken in partnership with the Environment Agency (EA), BHCC, Adur District Council, Shoreham Port Authority.
7. Administering Sustainability and Carbon Reduction Investment Fund (SCIF) overseen as business as usual by Carbon Neutral 2030 Member Working Group.
8. Circular Economy (CE) Routemap agreed by P&R Committee in December 2020. CE Programme established and overseen by programme manager.
9. Biosphere Management Plan agreed September 2020 and being implemented and being monitored by the Biosphere Delivery Board.

Second Line of Defence - Corporate Oversight

1. BHCC's Environment, Transport & Sustainability (ETS) Committee is responsible for the council's functions in relation to coastal protection and flood defence; sustainability; parks; open spaces; sustainable transport; highways management and environmental health
2. Biosphere delivery board oversees delivery of biosphere management strategy
3. BHCC's Policy & Resources (PR) Committee approved the 2030 Carbon Neutral programme in Dec 19 and a Member working group to develop a high level carbon neutral plan by June 2020
4. The Council's Corporate Plan includes a section of priority actions around the theme of 'A Sustainable City' and the target to transition to carbon neutral by 2030.
5. Air quality Programme Board
6. Greater Brighton Economic Board's Infrastructure Panel has oversight of Energy and water plans
7. Communications & Engagement officer agreed to support carbon neutral programme.
8. A Climate Assembly (Citizens Assembly) undertaken as part of a deliberative engagement process to identify and prioritise actions which will support the delivery of the 2030 Carbon Neutral Programme, starting with a focus upon Transport.

Third Line of Defence - Independent Assurance

Environment Agency (EA) in respect of flooding and monthly reports made to EA on how the city council spends the monies received from EA includes schemes such as coastal protection; Property Level Protection; sustainable urban drainage SPG (policy); Strategic Flood Risk Assessment.

2. Internal Audit acts as first level controller to support three EU funded projects part of whose remit is to address some elements of this risk. These are Solar Adoption Rise In the 2 Seas (Solarise), Shaping Climate change Adaptive Places (SCAPE) and Sustainable Housing Initiatives in Excluded Neighbourhoods (SHINE). All claims during 2020/21 were certificated in accordance with EU processes.
3. The risk was reviewed at A&S Committee in January and October 2020.

Reason for Uncertainty in Effectiveness of Controls - A significant element of the transition to carbon neutral requires national and/or international policy change and transformation at scale across the city in partnership with City partners, as well as significant behaviour change amongst communities.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Deliver the 2030 Carbon Neutral City Programme to report to P&R Committee (involves work between the ED EEC; the Executive Lead Officer, SGL; and Head of Policy, Partnerships & Scrutiny)	Executive Director Economy, Environment & Culture	35	31/03/23	21/05/19	31/03/23
<p>Comments:</p> <ul style="list-style-type: none"> • 2030 Carbon Neutral Programme Initiation Document approved at P&R committee in December 2019 • Cross-party 2030 Carbon Neutral Programme Board established with terms of reference agreed by P&R Committee, December 2019 • Review of current initiatives that currently tackle climate change developed • Governance structure for officer steering group and project team established, October 2019 • Collation of outline the baseline data and measuring tool, October 2019 • Lead BHCC officer identified and working on Communications plus Digital communications support in place , November 2019 • Ipsos Mori appointed for support to establish and deliver as deliberative engagement (Climate Assembly) process October 2020 - Independent Advisory Board to oversee the Climate Process established – July 2020 - Recruitment of residents to the Climate Assembly – August 2020 - Virtual Climate Assembly took place Oct-Nov 2020 - Outcomes from the Climate Assembly reported to P&R Committee - end Jan 2021 - Draft 2030 Carbon Neutral Programme presented to P&R Committee - end March 2021. - Allocation of transport elements of Carbon Reduction Fund and Climate Assembly Fund agreed by P&R Committee – July 2021 - Report on developing a blue/green investment plan agreed by Greater Brighton Economic Board – July 2021 <p>Steps included work to:</p> <ul style="list-style-type: none"> - deliver the carbon neutral programme - continue to monitor and report on carbon emissions - Proposed allocation of non-transport elements of the Carbon Reduction Fund to be presented to P&R Committee – October 21 - Develop Greater Brighton Blue/Green Investment Plan – Feb 2022 - continue to work up medium term projects for when the plan is reviewed in 2023. 					
Develop a local cycling and walking infrastructure plan (LCWIP)	Assistant Director City Transport	60	30/11/21	21/05/19	30/11/21
<p>Comments: Jun-21: Three stages of stakeholder engagement have been held on the LCWIP project in June and September 2020, and January 2021. Combined with data analysis and modelling work, this has helped inform and develop the draft walking and cycling network. Key walking and cycling route</p>					

audits have been undertaken and high-level proposals suggested. Additional work on cycle parking has been completed and further work on the walking network has been commissioned, to be completed by March 2021.

An Interim LCWIP was developed in response to the Covid-19 emergency and approved by the ETS Committee in June 2020. This is being carried forward via the Covid-19 Urgent Response Transport Action Plan with temporary walking and cycling measures having been installed in the summer. Longer terms proposals for cycling and walking measures have been consulted on recently and ETS Committee will make decisions on these in July 2021.

Develop a new sustainable transport strategy (LTP5) for the city	Assistant Director City Transport	40	31/10/21	21/05/19	31/10/21
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Comments: Jun-21: Internal and key partner engagement took place in Autumn 2020 to inform the developing vision for Transport in the city. A draft vision document is being prepared for wider engagement and public consultation in Autumn 2021. Completion of a draft LTP5 is expected to be ready for further consultation towards by March 2022.

Provisional work on the LTP5 was used to inform materials developed for the Transport-focused Climate Assembly discussions held in Autumn 2020.

Develop a whole Downland Estate plan	Assistant Director - Property & Design	72	31/03/22	21/05/19	31/03/22
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Comments: CDEP consultation/ engagement has progressed with 5 workshops, external stakeholder session, extra sessions as required and culminated in the PfR facilitated April Carousel event with over 90 attendees. Following 4 themed breakout groups PfR were able to form a composite CDEP draft vision reflective of the whole consultation process. This is being signed off through a Member session in July. The next steps are for the PfR draft report to be issued and published. The draft CDEP will start to be written and will collect feedback from the process so far. The draft CDE Plan will be issued in the Autumn for consultation representations. There will be engagement with SDNPA members with a view to taking the CDEP to P & R Committee at the end of 2021 early 2022 and a SDNPA Board for approval.

Improve rates of recycling and re-use and develop business case for food waste collection	Assistant Director - City Environmental Management	60	31/03/22	21/05/19	31/03/22
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Comments: Aug-21:

29.2% of waste was recycled between October 2020 and March 2021.

Recent actions delivered include:

- Approval received from Environment, Transport & Sustainability Committee to undertake a full feasibility study and business case into the introduction of a food waste collection service. The study will also include the carbon impacts of the change.
- Delivery of Digital Cityclean Project to improve the service using digital means and redesigning processes and procedures as necessary. All Cityclean

processes have been mapped.

- Remainder of recycling wheelie bins rolled out. Project will be complete within the quarter 2.
- Between 12 November 2020 and 28 January 2021: there were 591 household collections via the new tech Take Back Scheme, with 6474 items collected and weighing a total of 10.9 tonnes. 616 tonnes of CO2 emissions were saved through reuse of these items
- With partners, started delivery of BLUEPRINT, which is providing practical solutions for designing out waste and pollution by reusing, repairing and recycling existing resources.
- Started developing the specification for the feasibility study to understand the costs of retrofitting the Materials Recovery Facility in Hollingdean to accept Pots, Tubs & Trays (PTT) for recycling. The study has been expanded to include all materials proposed for recycling collections as part of the National Resources & Waste Strategy. The study will also include the carbon impacts of the change.

Review procurement of fleet to deliver lower emissions & improve air quality	Assistant Director - City Environmental Management	60	31/03/22	21/05/19	31/03/22
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Comments: Aug-21:

- Continuing implementation of 10-year Fleet Strategy
- First electric truck to be delivered this month, with a further truck in October and two more by April 2022.
- Working with Property & Design and UKPN to upgrade depot power intake to ensure power capacity is sufficient
- Started procurement of City Parks items to introduce more electric and low carbon vehicles as well new plant
- Started tender process for new sweeper; these will be diesel with electric options to follow closer to 2030
- Replaced all small sweepers and demonstrations continuing with sweepers using a deck scrubber and weed ripper.

Roll out a network of electric vehicle charging points (EVCP) - Directorate Plan ref. 4.38	Assistant Director City Transport	90	30/09/21	21/05/19	30/09/21
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Comments: Jun-21: Installation of 200 lamp post chargers all linked to the Electric Blue app with live charge point status updates is fully complete.

The replacement and upgrading of existing fast chargers should be complete by the end of June 2021. Of the 4 rapid taxi hubs with 24 charging bays planned for installation, 3 are now operational, but work on the remaining hub at the racecourse is being delayed until October 2021 whilst the site is being used as a Covid-19 vaccination centre.

The project aims to increase electric vehicle uptake in the city through an improved charger network to help meet net carbon neutral ambitions by 2030 and air quality targets. All public chargers are powered by 100% renewable electricity.

Further grant funding has recently been secured from Innovate UK to create a model disabled bay charging point and a booking systems for charging electric fleet vehicles on the public network.

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Eff. of Control
SR23	Unable to develop and deliver an effective regeneration and investment strategy for the seafront and ensure effective maintenance of the seafront infrastructure	Executive Director Economy, Environment & Culture	BHCC Strategic Risk	Aug-21	Threat	Treat	Amber L3 x I4	Amber L3 x I3	Revised: Adequate

Causes

Link to Corporate Plan 2020-23: Outcome 2 'A city working for all', actions 2.5 'Develop our visitor economy'.

The seafront is a city asset which is iconic and contributes to the city's reputation. The council is the lead custodian of the seafront but the benefits are shared by many. At least 5 million people use our seafront every year. It is a very significant attraction in our visitor economy; provides a series of important public spaces for residents; many businesses in the city rely on the draw of the seafront to sustain their organisation's value and to provide an attractive place for stakeholders and employees. It is being used beyond its original design life and, in many ways, is a victim of its own success and affected by the changing patterns and increased demands of usage. Resourcing required to deliver a solution is not readily available and impacts on timing of delivery of any projects. There several ambitious capital, regeneration and investment projects along seafront in various stages of planning development, including the Waterfront project, Shelter Hall, the King Alfred. The deterioration of Madeira Terraces in particular have reached a critical point, requiring fencing and safety measures until a longer term funding is developed which is expected to cost £24 million. The council is proactive in bidding for Heritage Lottery Funds (HLF) but as at 3 January 2019 two bids have been unsuccessful. The City Council is the coast protection authority and is required to deliver coastal strategy studies, coastal protection, and flood defences in partnership with DEFRA and the Environment Agency. Management of climate events, long shore drift and the impact of climate change requires management and re-profiling of the shingle beaches, groynes and sea walls.

Potential Consequence(s)

Without adequate investment the seafront will decline in popularity and impact on the visitor economy and the city and regional economy with potential to affect:

1. the heritages structures and infrastructure along the seafront which require significant investment and ongoing revenue in order to ensure suitability for modern use
2. preservation of the reputation of the city and enhancing its offer and protecting the visitor economy
3. the A259 highway and associated structures, such as the seafront arches and sewage infrastructure which could have an impact upon our transport systems and economy, and effect sewage and foul water management in the city centre
5. management of the impact of climate events and long shore drift upon the city's beaches which would lead to reduction in amenity space impact upon the visitor economy and profitability of small businesses
6. provision of adequate sea protection measures which could lead to coastal flooding impacting upon residents, businesses and visitors.

Existing Controls

First Line of Defence: Management Controls

- 1) Strategic Delivery Board has been established and is actively considering seafront redevelopment opportunities including the Black Rock and King Alfred sites. Project managers provide a monthly report of all projects to the Strategic Delivery Board.
- 2) Department for Transport (DfT) funding secured for the redevelopment of the West Street / A259 Junction and Shelter Hall. Initial infrastructure work commenced late 2015.
- 3) Annual special inspection report on the condition of Madeira Terraces undertaken by Structural Engineering consultants.
- 4) PR&G approval in December 2018 to enter into a conditional land acquisition agreement with Aberdeen Standard Investments for the Brighton Waterfront Project.
- 5) Project has commenced to restore first 30 arches of the Madeira Terrace with a Madeira Terrace Project Board established to oversee the project.
- 6) King Alfred Project Board established, looking at options for development.
- 7) Physical (weekly and monthly) Inspections of 12km of Coastline and Sea Defences undertaken by Coast Protection Engineer.
- 8) Seafront Structures supporting the A259 are routinely maintained and restored utilising funding via the Council's LTP annual capital programme.

Second Line of Defence: Corporate Oversight

1. Quarterly monitoring of strategic management of the council's investment in the seafront through the Greater Brighton Economic Board and the Member led Strategic Delivery Board as project specific member-led projects boards, underpinned by the Officer led Corporate Investment Board (capital) and Modernisation Board (revenue).
2. Member oversight by Regional Flood & Coastal Defence Committee, facilitated and Chaired by Environment Agency.
3. Coast Protection solutions and projects delivery by service lead officer.

Third Line of Defence: Independent Assurance

1. The risk has been reviewed by the A&S Committee in 2020/21 on October 2020; in 2019/20 in January 2020;
2. Internal audit reviews were Seafront Investment Strategy (Strategic Risk 23) Reasonable Assurance - December 2018. Internal Audit work on the Waterfront Project in 2017/18. In 2016/17 audits were Valley Gardens and Shelter Hall (Limited Assurance). Some independent assurance on this risk is also provided by the Greater Brighton Economic Board (quarterly) and Coast to Capital LEP.
3. Projects funded by Government departments are overseen by the Greater Brighton Economic Board (quarterly) and Coast to Capital LEP governance arrangements (quarterly) / and by relevant government department (according to their timetable). No funding has been withdrawn to date.
4. Department for Transport (DfT), Coast to Capital (C2C) LEP and TfSE funded schemes will be scrutinised by their respective regional officers
5. Coast Defence includes oversight of B&H's Coastal Defence Strategy and agreement of Business Cases by Environment Agency and DEFRA.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Bid for external funding to carry out large scale repairs to ensure longevity of seafront structures	Assistant Director City Transport	20	01/01/25	01/05/19	01/01/25
<p>Comments: Jun-21 update: Negotiations continue with the Department of Transport (DfT) in respect of the £20M funding bid submitted by the council as part of the new designation for the A259 in the city as 'Major Route Network', this is being facilitated and prioritised by Transport for The South East (TfSE). This started in July 2019 when we submitted our bid to TfSE for onward submission to DfT with the intention that once we were successful schemes would begin in 2020/21 for approx. 5 years duration but we are still in negotiations.</p>					
Bring forward key sites that form the City Regeneration Programme: 1) Waterfront; 2) Black Rock; and 3) King Alfred.	Assistant Director - City Development & Regeneration	10	31/03/23	01/04/19	31/03/23
<p>Comments: Aug-21: 1) Waterfront: A report went to P&R Committee in July 2021 updating members on current progress, ahead of a plan to report back in January 2022 with clear a recommendation on strategy moving forward. Officers are currently embarking upon a procurement exercise to appoint a specialist consultant to undertake extensive research and market analysis to determine optimum capacity and a financial model to help inform operation and revenue projections moving forward. 2) Black Rock: Work now underway, with a successful planning application achieved in June 2020 and 4 works packages moving ahead. Progress is being reported to the Member Working Group. From Summer 2020. 3) King Alfred: The Sports Facilities Investment Plan for the strategic investment in the whole sports estate was agreed in June 2021. King Alfred will be a project within that wider strategy, overseen by a Member Working Group. Site options for a West Sports Hub (presently the KA) continue to be investigated.</p>					
Flood and Coastal Erosion risk management - complete the feasibility and detailed design work prior to implement the Brighton Marina to River Adur coastal protection scheme undertaken in partnership with the Environment Agency (EA), BHCC, Adur District Council, Shoreham Port Authority. The scheme proposes new and improved groynes, seawall and beach profile management, to improve coastal protection for the seafront arches, promenade, A259, southern storm water sewer, city main foul & storm wate	Assistant Director City Transport	70	28/02/22	01/04/18	28/02/22

Comments: Jun-21 update:

Technical and financial approval for Grant in Aid funding has been formally approved by the Environment Agency (EA) and work is underway on the detailed design scope before a detailed design contract can be awarded by May 2021.

Monitor, manage and carry out repairs to highways and structures related to the seafront	Assistant Director City Transport	90	31/12/23	01/08/16	31/12/23
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Comments: Jun-21 update:

Procurement of detailed design on Phase 4 will start later in 2021 but progression is subject to funding from the Department for Transport (DfT). Phase 3 of the Seafront Arches (Shelter Hall) scheme is now largely complete. Some parts of the building remain unoccupied, but the main premises is occupied. Phase 4 to 5 of the Kings Road Arches bid to DfT was submitted in 2019, but a lack of resource and capacity has hindered progress on the application.

The crowd funding campaign for the renewal and upgrading of the first three arches was successful, further funding has been allocated in budgets and MT30, i.e Madeira Terraces first 30 arches, (first phase) design work has commenced.	Assistant Director - City Development & Regeneration	25	31/03/23	22/12/17	31/03/23
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Comments: Aug-21:

- Design Team has delivered RIBA Stage 2 report for first 43 arches.
- HOP completed structural survey of MT Shelter Hall (C2)
- Policy & Resources Cttee agree delegated authority to ED of Economy, Environment Culture to Procure & award contract for restoration works. (1/7/21)
- Procurement Advisory Board meet re: procurement route for MTR-Ph1.

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Eff. of Control
SR21	Unable to manage housing pressures and deliver new housing supply	Executive Director, Housing, Neighbourhoods & Communities	BHCC Strategic Risk, Environmental / Sustainability	Aug-21	Threat	Treat	 L4 x I4	 L3 x I3	Revised: Adequate

Causes

Link to Corporate Plan 2020-23. Outcome 1 'A city to call home'.

Brighton & Hove is a growing city with high house prices, low incomes, an ageing population and a significant proportion of households with a support need. Scope for development within the city is affected by significant geographical constraints and competing land pressures. The increasing demand for housing continues to outstrip new supply and as a consequence accommodation is becoming less affordable. Housing shortages are particularly acute for low income households affecting our ability to retain essential workers in the city. Demand for affordable rented homes is growing with a significant number of households in temporary accommodation. The private rented sector continues to expand at the expense of rates of owner occupation which are in long term decline.

Potential Consequence(s)

1. Changes in Government legislation require council intervention to prevent homelessness at an earlier stage.
2. The city is constrained in its capacity to accommodate economic growth, housing supply obligations and sustainable development objectives.
3. The city council is unable to meet its strategic housing and planning policy objectives to: meet City Plan and Housing Strategy requirements in terms housing numbers; improve overall housing supply and housing mix; deliver affordable lower cost homes, in particular homes for rent.
4. The city council is unable to meet statutory homelessness obligations. In particular, corporate critical budget implications arising from Temporary Accommodation pressures owing to lack of suitable alternative accommodation and overall need to reduce the use of Temporary Accommodation.
5. The shortage of homes to meet the accommodation requirements of elderly and vulnerable people which can have an adverse impact on social care provision and cost pressures on both social care and Health.
6. Impact on our ability to recruit and retain lower income working and younger households and employment in the city, in particular in social care, health and other lower wage sectors.
7. Housing pressures and inability to access to affordable good quality homes may have varying and disproportionate adverse impacts on different groups and communities.

Existing Controls

First Line of Defence: Management Controls

1. Housing Work Plan 2019-2023 agreed at Housing Committee on 18 September 2019 with reports on progress to be taken to every other committee. Progress is also subject to regular review against delivery within business plans e.g. HNC Directorate Plan and Service Plans;
2. The City Plan also sets out housing targets across all tenures; policies on securing affordable housing through the planning system, residential development standards;

3. Housing Revenue Account (HRA) Asset Management Strategy is aligned to Housing Strategy in support of improving housing supply & housing quality which is in alignment with the Housing Committee Work Plan;

Key controls include:

1. Housing Allocation Policy framework ensuring best use of existing council and registered provider resources through nomination of affordable housing to priority households.
2. Deliver 800 additional council homes - 2019-23. Includes:
 - a) New build council homes under our New Homes for Neighbourhoods programme;
 - b) Homes purchased under our Home Purchase Policy;
 - c) Improving supply through best use of existing HRA assets including conversions and extensions and the hidden homes programme;
 - d) Work in partnership with Community Land Trust to support community housing initiatives.
3. Deliver 700 other affordable homes - 2019-23. Includes:
 - i) Enabling delivery of new affordable homes in partnership with Registered Provider partners and Homes England;
 - ii) Development of additional Housing Delivery Options. The Living Wage Joint Venture 'Homes for Brighton & Hove' with Hyde to deliver 1,000 new lower cost homes for rental and sale. Future possibilities for housing market intervention / direct delivery through a council wholly owned housing company;
4. Increase the supply of council owned Temporary Accommodation (TA) in addition to procurement of TA and long term private sector housing lettings with private landlords for those to whom we owe a housing duty;
5. Bringing long term empty private sector homes back into use through our Empty Property Service;
6. Tenancy sustainment initiatives particularly for more vulnerable people in order to prevent homelessness;
7. Ongoing work of Greater Brighton Housing & Growth initiatives to share good practice and accelerate delivery of new homes;
8. On-going work of the Greater Brighton Strategic Property Board; bringing national, regional and local partners together to make the best use of the combined public estate – including the release of surplus land and sites for economic growth (new jobs, employment floorspace and homes);
9. Early intervention through the homelessness trailblazer programme and funding to support households into the private rented sector;
10. Homeless and Housing Recovery working group includes partners risk log and mitigations to the key Covid-19 risks for Housing including 1) the need to move on rough sleepers accommodated under the 'Everyone In' initiative; 2) increase in Statutory Homelessness as we move out of the pandemic (relates to the moratorium on Private Rented Sector evictions); and 3) relationship/household breakdown due to Covid pressures and impacts post Covid.

Second Line of Defence: Corporate and Committee Oversight

1. The Housing Committee Work Plan 2019-2023 focuses on key shared priorities around providing Additional Affordable Homes including consultation with stakeholders, resource planning and a timescale for reports to come to Committee. Performance reports to be brought to alternate Housing Committee meetings to monitor how officers are progressing with delivery against the Work Plan.
 2. Corporate Investment Board.
 3. Strategic Investment Board.
 4. Cross Party Housing Supply Members Board (formerly Estates Regeneration Members Board, cross party).
 5. Strategic Housing Partnership (cross sector).
 6. Strategic Accommodation Board (reviewing accommodation needs of vulnerable households across Housing, Children Services & Adult Social Care).
- Progress is reported in Housing, Neighbourhoods & Communities (HNC) Directorate Plan.

7. The risk was reviewed at Audit & Standards Committee in January 2019 and October 2020.
8. Homeless Reduction Board - a Member Board meeting at least quarterly to oversee progress against the Homelessness and Rough Sleeping Strategy.

Third Line of Defence: Independent Assurance

1. 2020/21 The risk was reviewed at A&S Committee in October 2020. An Internal Audit of Temporary Accommodation was undertaken (Minimal Assurance), Housing Repairs Service (Partial Assurance).
2. 2019/20 The risk was reviewed at A&S Committee in January 2019 and March 2020. The Internal Audit reports Housing Allocations (Substantial Assurance), Temporary Accommodation (Partial Assurance).

Current activity is to ensure all Audit requirements have been actioned.

2. Internal Audit - previous activity. June - Oct 2018 Supported & Semi-Independent Accommodation – Reasonable Assurance. No specific Internal Audit work in 2017/18. In 2016/17 on Housing New Builds concluded Substantial Assurance.
3. Ministry of Housing, Communities & Local Government information returns. Submitted annually.
4. Homes England (HE) information returns where we have HE grant allocations. HE grant for homeless move on accommodation – regular updates to HE on scheme progress and draw down on grant.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Deliver Housing Committee Work Plan	Assistant Director Housing	30	31/03/23	01/10/19	31/03/23
<p>Comments: Jul-21: The Housing Committee Work Plan 2019-23 is incorporated in the Housing, Neighbourhoods & Communities Work Directorate Plan and appropriate business plans. Regular reports on progress are made to Housing Committee and Performance reporting six monthly to P&R Committee. Links to reports are available on the council's website. This is now subject to quarterly reporting to Housing Committee, incorporated as part of our regular performance report.</p>					
Effective implementation of affordable housing policy in the City Plan	Head of Planning	70	31/03/22	01/04/15	31/03/22
<p>Comments: July 21 - The Development Management Service continues to implement policies in the City Plan to secure on site affordable housing (subject to viability) and/or commuted payments in consultation with policy and housing colleagues. Monitoring (2019-20) indicates that an average of 21% of all housing delivered annually in the city is affordable housing (the delivery target is 30%). Challenges are viability, permitted development rights (office to residential) and emerging first homes policy. Commuted sums secured towards direct delivery of affordable homes is reported in the Infrastructure Funding Statement and at November 20 the pot stood at £5.7m The Submission City Plan Part Two, which includes housing site allocations and a build to rent policy, will progress to examination stage in October 21 with a view to adoption in Spring 2022. Affordable Housing and Viability Training provided to Councillors in July 21. Recruitment of a Housing Delivery Project Officer (funded by council for one year) will be carried out in September 21 the primary role will be to unblock delayed housing sites.</p>					

Work with partners to address student housing needs	Head of Planning	95	31/03/22	01/04/15	31/03/22
<p>Comments: Jul-21: Citywide Article 4 Direction in place from June 2020 for new small HMOs. This means planning permission is required for all new small HMOs which allows policies in the City Plan Part One and Part Two (the latter with limited weight) to be applied in considering applications. There are objections to the Part Two Plan policy which will be tested at examination. Meanwhile, a significant number of purpose built student accommodation/rooms have been delivered or are under construction. The last Authority Monitoring Report (2019-20) indicates that an additional 4500 rooms have or are being added to the city's stock since City Plan was adopted in 2016. This is likely to reduce pressure for HMOs on the existing housing stock in the city and enable release back to small homes. Work will be undertaken to assess the impact.</p> <p>Collaborative working continues with close working between Private Sector Housing, Planning and other relevant Council Services and the 6/8-weekly Private Rented Sector (PRS) meetings with lead councillors has been re-established (June 21) to support effective and collaborative implementation of policy and enforcement.</p>					
Work with partners, including regional partners & LEP, to promote Economic development incl. increased sub-regional working to meet housing need	Head of Planning	40	31/03/22	01/04/15	31/03/22
<p>Comments: Jul-21: Work on West Sussex and Greater Brighton's Local Strategic Statement 3 (LSS3), which will provide a strategy for meeting housing, business space and infrastructure needs across the area, has been further delayed. In the interim, work has been carried out on a joint statement of common ground to support Local Plans. Background evidence will also be commissioned directly from consultants, via an agreed procurement framework, that will underpin future work on LSS3. This work is due to be completed by December 2022.</p> <p>The Government has indicated it will abolish the current mechanism for cross authority working (Duty to Cooperate) and proposals for its replacement are likely to come forward later this year. In the meantime, cooperative working continues with both West and East Sussex authorities to help meet future housing needs.</p>					

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APPENDIX 2: A guide on the risk management process

including the questions Members might want to ask of Risk Owners in relation to Strategic Risks

1. Across the council there are a number of risk registers which prioritise risks consistently by assigning risk scores 1-5 to the likelihood (denoted by 'L') of the risk occurring, and the potential impact (denoted by 'I') if it should occur. These L and I scores are multiplied; the higher the result of $L \times I$, the greater the risk.

e.g. L4xI4 which denotes a Likelihood score of 4 (Likely) x Impact score of 4 (Major), which gives a total risk score of 16.

2. A colour coded system, similar to the traffic light system, is used to distinguish risks that require intervention. Red risks are the highest, followed by Amber risks and then Yellow, and then Green.

	IMPACT				
	Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
LIKELIHOOD					
Almost certain (5)	0	0	0	0	0
Likely (4)	0	0	0	1	0
Possible (3)	0	0	0	1	1
Unlikely (2)	0	0	0	0	1
Almost impossible (1)	0	0	0	0	0

3. The Strategic Risk Register (SRR) mostly includes Red and Amber risks. Each strategic risk has a unique identifying number and is prefixed by 'SR' representing that it is a strategic risk.
4. Each risk is scored twice with an Initial 'Current' level of risk and a Revised 'Target' risk score:
 - a) The **Initial 'Current' Risk Score** reflects the Existing Controls already in place under the 'Three Lines of Defence' methodology. This represents good practice as it identifies the First Line – Management Controls; Second Line – Corporate Oversight; and Third Line – Independent Assurance and the currency and value of each control in managing the risk. Therefore the Initial Risk Score represents the 'as is' / 'now' position for the risk, taking account of existing controls.
 - b) The **Revised 'Target' Risk Score** focuses on the application of time and expenditure to further reduce the likelihood or impact of each risk. It assumes that any future Risk Actions, as detailed in risk registers, will have been delivered to timescale and will have the desired impact.
 - c) The Risk Owners are asked to consider the 4Ts of Risk Treatments – Treat, Tolerate, Terminate, Transfer. Risk actions should reduce the likelihood and/or impact – if neither are true, there will not be any reason to undertake the action.

Suggested questions for Members to ask Risk Owners and officers on Strategic Risks

The Audit & Standards Committee has a role to monitor and form an opinion on the effectiveness of risk management and internal control. As part of discharging this role, the Committee focuses on at least two Strategic Risks at each of their meetings.

The Committee invite the Risk Owners of Strategic Risks to attend Committee and answer their questions based on a CAMMS Risk report appended to each Report. In the CAMMS Risk report, the Risk Owner:

1. Describes the risks, the cause and potential consequences and the officers involved and provides an **Initial 'Current' Risk Score** which takes account of the existing controls in place to mitigate the risk.
2. Existing Controls are set out using the Three Lines of Defence model:
 - 1st line: management controls
 - 2nd line: corporate oversight
 - 3rd line: independent assurance

This is provided in order that Members can identify where the assurance comes from, and how frequently it is reviewed and in the case of the 3rd line, then whether audits or inspections have happened and if so when that did it happen and what the results were. Risk Owners ensure that existing controls continue to operate effectively.

3. (Future) Risk Actions then are detailed and allocated to individuals with percentages achieved against target dates, with commentary on the current position. This provides the **Revised 'Target' Risk Score** which assumes that all the risk actions have been successfully delivered.

The Risk Owners of Strategic Risks will always be an Executive Leadership Team (ELT) officer. They may bring with them to Committee other officers who are more closely connected to the mitigating work.

Three areas of enquiry are suggested to be explored by the A&S Committee:

1. Is the Risk Description appropriately defined? Does the Committee understand the cause and potential consequences?
2. Is the Committee reassured that each (future) Risk Action either reduces the impact or the likelihood of the risk? Are members reassured that risk actions are actually being delivered?
3. In respect of the Initial 'Current' and Revised 'Target' Risk Scores, does the Committee feel comfortable with Risk Owner's assessment? This represents the risk level that the organisation is prepared to accept.

How Members and officers can input on Strategic Risks (SRs)

The risk management process benefits from input by Council Members and by staff at all levels. The opportunities to do this are:

Members to ELT leads:

- Each SR is discussed between Members and ELT leads at the regular meetings with Committee Chairs
- Members are responsible for raising risks that they identify with their contact officers, often the Head of Service, Assistant Director or Executive Director
- Any risk suggestion from Members will be reviewed by ELT and any actions taken will be reported back to the relevant Member(s).

Officers to Line Manager, Directorate Management Team (DMT) or corporate risk management lead:

- The Behaviour Framework expects all officers to escalate risks and/or suggest mitigations to their line managers. If officers feel they do not have appropriate access to their line managers, they may escalate the risk to the corporate risk management lead
- Risks may get discussed as part of staff meetings, PDPs/121s/ team and service meetings or part of projects or programmes. Any significant risks to be escalated through to their Head of Service/ Assistant Director to raise through the management chain and discuss at quarterly DMT risk reviews.
- The ELT lead within a directorate will discuss escalated risks with the DMT at least on a fortnightly basis and will seek assistance as required. They have access to ELT and determine the way forward in consultation with the Risk Management Lead.

DMT to ELT:

- The quarterly SR review at ELT includes a summary of Directorate Risks reviewed at DMTs
- The ELT lead within a directorate will discuss escalated risks with the ELT and determine the way forward i.e. whether to amend the Strategic Risk Register