
MID YEAR REVIEW OF THE COUNCIL'S CORPORATE RISK REGISTER FOR 2012/13

1 SUMMARY

- 1.1 This report provides a mid year review and update of the Council's corporate risk register for 2012/13 for Members' consideration and approval.

2 INTRODUCTION

- 2.1 The corporate risk register (CRR) provides an overview of the key risks that may affect delivery of the Council's corporate objectives and service delivery.
- 2.2 The Council's corporate risk management framework and policy, which specifies how the Council seeks to manage and control risk, is not being presented for update and will next be reviewed for 2013/14.

3 THE CORPORATE RISK REGISTER FOR 2012/13

- 3.1 The summary corporate risk register for 2012/13 is included at appendix A. As agreed at the March 2012 Audit Committee, to reduce the volume of information presented, and give appropriate prominence to the more serious risks, only medium and high risks have been presented. Risks rated as low are shown in a simplified list at the end of the CRR. A full listing is available on request.
- 3.2 Each of the risks contained in the CRR has been reviewed using a detailed risk analysis, which also includes a summary action plan for the mitigation of each risk. An example of a risk analysis was presented at the March 2012 Audit Committee and the individual risk analyses are available for Members' inspection if required. A regular review of these risks and the mitigating controls and actions is undertaken by the officer corporate risk group and is minuted accordingly.
- 3.3 The CRR is underpinned by divisional risk registers that identify the risk management arrangements that mitigate the operational risks faced by each of the Council's service areas.
- 3.4 As part of the 2012/13 assurance programme, testing will be carried out on a range of controls contained in divisional risk registers. The tests will seek to confirm that controls are in place and operating well to mitigate risk.

4 PRINCIPAL CHANGES TO THE CORPORATE RISK REGISTER FOR 2012/13.

- 4.1 Corporate operational risk 10, which covers the risk of the Council not being able to recruit and retain the right people or skills to meet the changing demands of customers or legislation or the current uncertain economic climate has now been developed and reflects the introduction of the Council's

new safer recruitment policy from January 2012. It is anticipated that when the audit of these recruitment processes is concluded in the autumn of 2012 it will be possible to remove the strategic risk 6 (which covers the risk of employing unsuitable staff) from the risk register, to reflect the reduction in risk that follows from the new policy and procedures.

- 4.2 Following receipt of a report from the Health and Safety Executive on the risk management of our waste collection services, which was undertaken as part of a wider national review of such services, work is now underway to formalise procedures and ensure the adequacy of supervision in the management of contractors working for RDC. It is anticipated this risk analysis will be presented at the next review of the CRR in March 2013.
- 4.3 Potential new risks are currently under review regarding new legislation. These include the effects on Rochford residents of changes associated with the implementation of the Health and Social Care Act and a Judicial Review launched by the recycling industry, which challenges the UK Government's interpretation of an EU Directive and suggests that Councils should no longer be permitted to collect co-mingled recycling. The risk will be presented at the next review of the CRR.
- 4.4 No risks have been deleted at this review.

5 RISK IMPLICATIONS

- 5.1 Management of risk is fundamental to the sound operation of the Council. Failure to manage risk could have significant impact on the Council's ability to correctly define its policies and strategies or deliver against its objectives.
- 5.2 The implementation and operation of the risk management framework will minimise risks and thus mitigate any potential strategic, operational, reputational or regulatory consequences.
- 5.3 Failure to manage risk would also mean that the Council might face censure by its external auditors or the potential for legal proceedings in the event of breaches of the Health and Safety at Work Act.

6 LEGAL IMPLICATIONS

- 6.1 The Council's risk management policy and framework will assist in meeting any specific and general legislative requirements to monitor and manage its risks.

7 RECOMMENDATION

- 7.1 It is proposed that the Committee **RESOLVES**

That the updated corporate risk register for 2012/13 be approved.

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Background Papers:-

None.

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Corporate Risk Register **2012/13**



Report to Audit Committee – 27 March 2012 Appendix A – Corporate Risk Register 2012/13 – Executive Summary

Notes:

* Quality of controls:

- Poor indicates no controls in place or the few that are do not mitigate the risk.
- Fair indicates that some controls in place and some reduction in risk but still not adequate.
- Good indicates that controls in place are considered adequate and reduce the risk.
- Excellent indicates that effective controls are in place which reduces the risk considerably.

Next Review Date(s):

(Risks are reviewed regularly by the Corporate Risk Group and relevant service managers. The risk analyses are updated accordingly, but the Corporate Risk Register will be revised bi-annually.)

Part 1 – Strategic Risks.

Risk	Likelihood	Impact	Risk Rating	Principal Controls & Actions	Quality of controls*	Next Review Date(s)	Notes
SR1. The Council fails to respond appropriately to the levels of grant received from central government	3	3	Med	<ul style="list-style-type: none"> • Business Planning and Target setting processes • Corporate and Divisional / Services Area plans identify key priorities for service delivery • Communication of savings and consequences to Members, staff, residents and service users • Risk review of major contracts • Equality and diversity impact assessments • Medium Term Financial Strategy (MTFS) Action Plan monitoring • Regular reviews of financial modelling. 	Good	Oct 2012 April 2013	<p>The approved budget for 2012/13 is monitored regularly by SMT and reported quarterly to the Executive.</p> <p>Decisions are based on an understanding of service delivery priorities.</p> <p>Next review due with mid year budget review in October 2012.</p>

Report to Audit Committee – 27 March 2012 Appendix A – Corporate Risk Register 2012/13 – Executive Summary

Risk	Likelihood	Impact	Risk Rating	Principal Controls & Actions	Quality of controls*	Next Review Date(s)	Notes
<p>SR3. Risk that the lack of clear national direction leads to a lack of understanding as to where the Council needs to focus its resources.</p> <p>Risks and controls related to specific legislation follow.</p>	3	3	Med	<ul style="list-style-type: none"> Corporate and Divisional / Services Area plans identify key priorities Consultation with service users and staff informs decision making Shared Services and other efficiency projects explore new ways of working Workforce Development Plan (WDP) aims to maintain and develop staff skill sets Key proposals put to Members ensure correct governance Monitoring of new legislation Local Government Assoc. updates circulated to SMT 	Good	<p>Oct 2012</p> <p>Jan 2013</p> <p>April 2013</p> <p>July 2013</p>	There continues to be uncertainty in terms of central government decision making / policy making, including uncertainty as to what constitutes a standard service supplied by a local authority and therefore how free the Council is to set its own standards.
SR3 Localism - The Council could face new financial or service delivery risks as a result of the Localism Act	4	3	Med.	<ul style="list-style-type: none"> Retention of a local Standards Committee Robust tendering and contract management to be applied to any services which may be operated by local bodies MTFS and budgets take account of "localised" services Local Development Framework process to take account of the provisions of the Localism Act 	Good	<p>Oct 2012</p> <p>April 2013</p>	The extent of localism being proposed is as yet unclear and the provisions for Secretary of State determinations may create unpredictable outcomes. Uncertainty means that the risk likelihood remains significant at present, even with controls in place.

Report to Audit Committee – 27 March 2012 Appendix A – Corporate Risk Register 2012/13 – Executive Summary

Risk	Likelihood	Impact	Risk Rating	Principal Controls & Actions	Quality of controls*	Next Review Date(s)	Notes
SR3 Welfare Reform -The Council could face new financial or service delivery risks as a result of the Welfare Reform Bill.	4	3	Med.	<ul style="list-style-type: none"> Capacity reviewed regularly to ensure resources adequate to meet demand for services Staff Career Matrix maintains career paths and expertise MTFS and budgets take account of redefined services Budget monitoring reports Liaison with Benefits System IT suppliers to ensure awareness of the system changes required. 	Good	Oct 2012 April 2013	Transitional arrangements are unclear at present and provision for Secretary of State determinations may create additional unforeseen risks. Uncertainty means that the risk likelihood remains significant at present, but controls should lessen impact.
SR3 Local Government Finance Bill - The Council will face new financial or service delivery risks as a result of the Local Government Finance Bill, particularly in respect of the proposals to localise support for Council Tax and the replacement of Formula Grant by the Business Rates Retention Scheme	4	3	Med	<ul style="list-style-type: none"> Management analysis of the effects LG Finance legislation Pan Essex Council Tax Support Scheme Project Group and Essex Leaders Strategic Finance Group Monitor Government announcements on the Business Rates Retention Scheme. 	Fair	Oct 2012 April 2013	A 10% cut in the Council Tax Benefit support grant coupled with defined protection for vulnerable groups could entail additional costs for the Council or reduced support to other clients.
SR3 Individual Electoral Registration (IER) - The Council will face additional responsibilities and costs in implementing IER for 2013/14 and 2014/15	TBA	TBA	TBA	<ul style="list-style-type: none"> Project Plan to be produced once timeline and tasks are clear Risk Analysis to be produced IT upgrades to Elections software 	TBA	Oct 2012 April 2013	We have yet to be informed of the value of any Government grant towards additional costs.

Report to Audit Committee – 27 March 2012 Appendix A – Corporate Risk Register 2012/13 – Executive Summary

Risk	Likelihood	Impact	Risk Rating	Principal Controls & Actions	Quality of controls*	Next Review Date(s)	Notes
SR4a. In awarding contracts, the Council may be challenged by unsuccessful bidders on the grounds that correct procedures (including meeting EU or other legal requirements) were not followed.	3	3	Med	<ul style="list-style-type: none"> • Council Financial Regulations and Contract Procedure Rules • EU compliant tendering procedures • Clear specification of requirements and tender award and marking criteria • Best value analysis • Internal Audit assurance testing to determine correctness of tendering • Intention to invite tender or place a contract is made visible to the Finance team. • Contractor selection systems • Specialist external advice is taken in respect of eg: EU procurement rules 	Good	Sept 2013	<p>In order to effectively manage the tender process the Council needs to ensure that it has the appropriate internal expertise and ensures that the right procedures are followed.</p> <p>(Controls have been reviewed in the light of feedback from a legal challenge in respect of one contract)</p>

Report to Audit Committee – 27 March 2012 Appendix A – Corporate Risk Register 2012/13 – Executive Summary

Risk	Likelihood	Impact	Risk Rating	Principal Controls & Actions	Quality of controls*	Next Review Date(s)	Notes
SR4a Tender process for new Grounds Maintenance Contract	4	3	Med	<ul style="list-style-type: none"> • Project team formed • Project Plan produced • Risk Analysis produced • Specialist advice obtained • Contractor selection systems • Adherence to Contract Procedure Rules • Specific contract clauses relevant to changes or termination of contract and other “Opt out” clauses • Performance bonds and guarantees • Business Continuity Planning (and prioritisation of services required) with appointed contractor • Contract and Performance Monitoring processes • Business Continuity Planning for the event of contractor failure. • Member Advisory Group 	Good	Monthly	The activity takes place in 2012/13 for a new contract starting in April 2013. Timescales are extremely tight particularly as we are moving from a resource based contract to an output based one.

Report to Audit Committee – 27 March 2012 Appendix A – Corporate Risk Register 2012/13 – Executive Summary

Risk	Likelihood	Impact	Risk Rating	Principal Controls & Actions	Quality of controls*	Next Review Date(s)	Notes
SR4b. Risk of contract arrangements failing whether due to failure of contractor, or because the Council fails to manage its contracts effectively.	3	3	Med.	<ul style="list-style-type: none"> • Opt out / service change clauses in contracts • Performance bonds and guarantees • Contract procedure notes are available to appropriate officers in event of contract manager or other experienced officers' absence / non- availability • Contract Monitoring processes • Business Continuity Planning • Ongoing "due diligence" checks to identify potential problems 	Good	Nov 2012 May 2013	<p>Risk rating is supported by specific analyses for each major contract. See below.</p> <p>(Controls have been reviewed in the light of failure of one contractor during 2012)</p>
<p>SR4b Individual risk analyses of the potential failure to provide contracted services exist for the following major contracts:</p> <ul style="list-style-type: none"> ○ Street Cleansing ○ Waste Management ○ Materials Recycling ○ Leisure Services 	2	3	Med	<ul style="list-style-type: none"> • Principal controls include: Contract procedures Contract Terms and Conditions Monitoring processes and meetings Performance bonds Business Continuity plans • In each case controls are Good and likelihood Very Low but risk is still Medium due to the potential impact of any failure 	Good	3 or 6 monthly	The current ICT Contract is seen as low risk and is covered by an entry in the Information & Customer Services Divisional Risk Register.

Report to Audit Committee – 27 March 2012 Appendix A – Corporate Risk Register 2012/13 – Executive Summary

Risk	Likelihood	Impact	Risk Rating	Principal Controls & Actions	Quality of controls*	Next Review Date(s)	Notes
<p>SR5. The Council could fail to implement shared services effectively. This could include :</p> <ul style="list-style-type: none"> failure to clearly define the outcomes required failure to deliver the defined outcomes failure to programme manage the shared service projects pressure on capacity whilst implementing shared services arrangements leads to deterioration of existing services un-intended creation of new legal entities and liabilities. 	3	3	Med.	<ul style="list-style-type: none"> Project Plans, business cases and risk registers for each shard services project Clear partnership agreements covering legal, financial and operational arrangements Reports to Council / Executive or project Steering groups and the Improvement Management Team Service monitoring via Council Performance Management System 	Good	<p>March 2013</p> <p>Sept 2013</p>	
SR8. The Council fails to respond effectively to an incident.	2	3	Med.	<ul style="list-style-type: none"> Business Continuity and Emergency Plans in place with an exercise and review programme. Data Quality and Records Management Policy Out of hours (OOH) response arrangements. IT restoration contract Civil Contingency plans 	Good	<p>March 2013</p> <p>Sept 2013</p>	<p>Business Continuity planning in respect of major contracts is under review in the light of experience of the failure of one contractor in 2012</p> <p>The IT restoration contract will end after the planned move of IT services to an off site data centre in 2012.</p>
SR10 The Council could face new financial or service delivery risks as a result of the Localism Act							Now part of Strategic Risk 3

Report to Audit Committee – 27 March 2012 Appendix A – Corporate Risk Register 2012/13 – Executive Summary

Risk	Likelihood	Impact	Risk Rating	Principal Controls & Actions	Quality of controls*	Next Review Date(s)	Notes
SR11 -The Council could face new financial or service delivery risks as a result of the Welfare Reform Bill.							Now part of Strategic Risk 3
SR12 Failure to agree and complete a satisfactory joint tender process for the next ICT Procurement in 2011 would mean we need to run our own process for a contract commencing in 2013.				Tender process is completed and a new contract for Rochford's ICT services will commence April 2013.			Withdrawn.
SR14 The Council could face legal challenges and adverse legal judgements of Council decisions if relevant procedures are not followed or satisfactorily evidenced	2	3	Med.	<ul style="list-style-type: none"> • Council Constitution and Procedure rules • Compliance with relevant statutory regulations • Records of decisions take • Council, Executive and Committee minutes • Progress on Decisions schedule • Consultation documents and responses to consultation 	Good	<p>April 2013</p> <p>April 2014</p>	In particular there is a increased propensity for legal challenges to planning decisions

Report to Audit Committee – 27 March 2012 Appendix A – Corporate Risk Register 2012/13 – Executive Summary

Part 2 – Corporate Operational Risks.

Risk	Likelihood	Impact	Risk Rating	Principal Controls & Actions	Quality of controls*	Next Review Date(s)	Notes
OR5 Failure to adapt to climate change (Monitored by energy usage and CO ₂ reduction Indicators)	4	2	Med	<ul style="list-style-type: none"> ClimateCO₂de controls implementation Climate based risk assessments in key documents Implementation of adaptive responses and actions Monitoring by Environmental Strategy Group 	Good	Oct 2012 April 2013	Risk and indicators under review at present.
OR6 Failure to safeguard children	2	3	Med	<ul style="list-style-type: none"> New Safeguarding Children & Vulnerable Adults Policy and Procedures Criminal Record Bureau checks Recruitment processes Section 11 Audit (self assessment to ensure compliance with Section 11 of the Children's Act). Attendance at the South East Local Children's Commissioning & Delivery Board Attendance at South Essex Stay Safe Group Designated person(s) for safeguarding issues– Head of Community Services and People and Policy Managers. Specific safeguarding section on Intranet that details processes, contact numbers, "what to do" actions etc. Staff and Member training programmes 	Good	March 2013 Sept 2013	<p>Procedures have been developed to cover the action to take if there are concerns over the wellbeing of a child, or if there are accusations against a member of staff.</p> <p>Procedures are being cascaded to all relevant staff.</p> <p>Safeguarding training currently being reviewed and E-Learning modules of differing levels to be rolled out to all staff over next few months.</p> <p>Member training conducted in November 2011</p>

Report to Audit Committee – 27 March 2012 Appendix A – Corporate Risk Register 2012/13 – Executive Summary

Risk	Likelihood	Impact	Risk Rating	Principal Controls & Actions	Quality of controls*	Next Review Date(s)	Notes
OR7 Failure to safeguard vulnerable adults	2	3	Med	<ul style="list-style-type: none"> New Safeguarding Children & Vulnerable Adults Policy and Procedures Criminal Record Bureau checks Recruitment processes Section 11 Audit to ESAB. Designated person(s) for adults and vulnerable people safeguarding issues– Head of Community Services and People and Policy Manager Specific safeguarding section on Intranet that details processes, contact numbers, “what to do” actions etc. Staff and Member training programmes 	Good	March 2013 Sept 2013	<p>Procedures have been developed to cover the action to take if there are concerns over the wellbeing of a vulnerable adult, or if there are accusations against a member of staff.</p> <p>Procedures are being cascaded to all relevant staff.</p> <p>Safeguarding training currently being reviewed and E-Learning modules of differing levels to be rolled out to all staff over next few months.</p> <p>Member training conducted in November 2011</p>

Report to Audit Committee – 27 March 2012 Appendix A – Corporate Risk Register 2012/13 – Executive Summary

Risk	Likelihood	Impact	Risk Rating	Principal Controls & Actions	Quality of controls*	Next Review Date(s)	Notes
OR9 The Council's service delivery may suffer if key staff are lost from a smaller leaner flatter organisation.	3	3	Med.	<ul style="list-style-type: none"> • Succession planning • Work shadowing / secondments • Procedure notes • Managed substitution and nominated deputies • Holiday/absence management • "My Performance Review" (MPR) process covers training and development needs • 'E' Learning modules • Intranet libraries of procedures • Member Training and Development Programme • Insurance to cover the loss of key staff 	Good	Oct 2012 April 2013	With expertise vested in fewer individuals, the Council is at greater risk of losing key knowledge, expertise, or skill sets. The controls listed seek to minimise this risk.
OR10 Council fails to recruit and / or retain the right people and skills to meet the changing demands of customers, legislation, or the economic climate	3	3	Med	<ul style="list-style-type: none"> • Workforce Development Plan / Profile • Investors in People / Positive about Disabled People • Safer Recruitment Policy and procedures, including; CRB checks, health checks, requirement for references, proof of eligibility to work in the UK etc. • Probationary period of 6 months • Induction training • Performance Reviews highlight development needs and competencies • Occupation Health Scheme referrals 	Good	April 2013 Oct 2013	Reviewed September 2012

Report to Audit Committee – 27 March 2012 Appendix A – Corporate Risk Register 2012/13 – Executive Summary

Risk	Likelihood	Impact	Risk Rating	Principal Controls & Actions	Quality of controls*	Next Review Date(s)	Notes
OR11 The Council fails to respond appropriately, or effectively, to unauthorised or illegal incursions/encampments on land in the District	3	3	Med.	<ul style="list-style-type: none"> Defined central point of contact for staff, Members and the public Legal procedure notes Senior Management Team emergency callout briefing note Rota call out officers notes Staff/Members briefings Appropriate physical barriers Intelligence reports Multi agency co-ordinated response arrangements including the Countywide Travellers Unit 	Good	<p>March 2013</p> <p>Sept 2013</p>	<p>Aim is to ensure any such incursions are remedied as soon as possible and with the minimum of cost, disruption, or damage.</p> <p>(Use of physical barriers is necessarily riskier than other controls because of the need to maintain user access to the areas concerned.)</p>
OR12 - Risk of not supplying accurate and timely data to meet requirements of the government Single Data List.	2	3	Med	<ul style="list-style-type: none"> Single Data List schedule of requirements Audit and Performance Team liaison with Heads Of Service Annual Performance Indicator Audit Other checks conducted as part of Internal Audits 	Good	<p>April 2013</p> <p>Sept 2013</p>	<p>The Single Data List was introduced by government to reduce the reporting burden on councils. It replaced the centralised collection National Indicators via a single channel with a range of reports to different departments. New Homes Bonus is based on a number of statistical returns.</p>

Corporate Risk Map

Impact	4 Catastrophic						
	3 Critical	OR 2,4 & 13	SR 8,14 & OR 6,7 & 12	SR 1,3,4a,4b, 5 & OR 9,10,11	SR 4		
	2 Marginal		SR 7a,9 & OR3,8	SR 2,6,7b,13 & OR 1	OR 5		
	1 Negligible						
		1 Negligible	2 Very Low	3 Low	4 Significant	5 High	6 Very High
		Likelihood					

Key	Risk level	Action required
	High	Urgent/imperative to manage down risk – transfer or terminate
	Medium	Seek to influence risk over medium term or transfer out risk e.g. by insuring
	Low	Tolerate and monitor – manage down if possible

Risk Scoring

LIKELIHOOD of event occurring					
Negligible – 1	Very Low – 2	Low – 3	Significant – 4	High – 5	Very High – 6
0% to 5%	6% to 15%	16% to 30%	31% to 60%	61% to 85%	86%to100%

IMPACT of event occurring				
	Negligible – 1	Marginal – 2	Critical – 3	Catastrophic – 4
Financial	£0K - £10K	£10K - £200K	£200K - £1M	£1M- £10M
Service Provision	Minor service delay	Short term service delay	Service suspended/ Medium term delay	Service suspended long term/ Statutory duties not delivered
Project	Minor delay	A few milestones missed	A major milestone missed	Project does not achieve objectives and misses majority of milestones
Health & Safety	Sticking Plaster/first-aider	Broken bones/Illness	Loss of Life/Major illness	Major loss of life/Large scale major illness
Objectives	Minor impact on objectives	Objectives of one section not met	Directorate Objectives not met	Corporate objectives not met
Morale	Mild impact on morale	Some hostile relationships and minor non cooperation	Industrial action	Mass staff leaving/Unable to attract staff
Reputation	No media attention/minor letters	Adverse Local media	Adverse National publicity	Remembered for years!
Government relations	Minor local service issues	Poor Assessment(s)	Service taken over temporarily	Service taken over permanently
Political	No interest / Minor attention	Adverse local media or individual public reaction	Adverse national publicity or organised public reaction	Major political reaction - remembered for years!

Report to Audit Committee – 27 March 2012 Appendix A – Corporate Risk Register 2012/13 – Executive Summary

Notes: This list provides a summary of the Corporate Risk Register which have been assessed as Low Risk.

Part 1 – Strategic Risks

Risk	Next Review Date	Notes
SR2. The Council could fail to understand and respond to changes in demand for its services resulting from the challenging economic environment (e.g. increasing homelessness and increasing demand on benefits).	Oct 2012	Controls in place.
SR6. The Council is at risk of employing unsuitable staff if it does not ensure robust recruitment procedures including screening staff adequately e.g. CRB checks, health checks, requirement for references, proof of eligibility to work in the UK etc.	Nov 2012	This risk will diminish as the result of the recent introduction of the new Safer Recruitment policy.
SR7a. The Council could fail to take correct decisions because of poor quality data or a failure to interpret data effectively.	Sept 2013	Controls in place.
SR7b. The Council may fail to adequately protect data resulting in key operational, commercial, or personal data being lost or made public.	Sept 2013	We aim to ensure that Personal data is fully protected in accordance with Data Protection Acts and with a good standard of controls
SR9. The Council may enter into, or continue with, statutory, or non-statutory, partnerships which fail to deliver the required services within agreed budgets.	Sept 2013	Partnership guidance document updated in September 2011 with establishment of joint LSP with Castle Point BC
SR13 The Council fails to discharge its responsibilities under either the Health and Safety at Work etc Act 1974 (or Regulations made there-under) or the Regulatory Reform (Fire Safety) Order 2005	Oct 2012	Controls in place.

Report to Audit Committee – 27 March 2012 Appendix A – Corporate Risk Register 2012/13 – Executive Summary

Part 2 – Corporate Operational Risks

Risk	Next Review Date	Notes
OR1 Ineffective internal or external communication.	July 2013	Internal and external communication processes are developed and continue to evolve.
OR2 Unexpected major financial liability or uninsured loss	Sept 2013	Reviewed at commencement of each Business Planning Cycle.
OR3 High volumes of staff, client or contractor fraud	June 2013	Review is linked to and covered by the Annual Governance Statement presented in June each year.
OR4 Failure to be aware of / comply with, existing or new legislation	May 2013	Controls in place.
OR 8 The Council could misunderstand or misuse its powers under the Regulation of Investigatory Powers Act (RIPA)	March 2013	Controls in place.
OR13 ICT service failures or other interruptions resulting from the move of ICT services to an off site data centre in 2012	Monthly and at project meetings	Project management in place.