

Epping Forest District Council Corporate Risk Register

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1. Introduction

A strategic risk management 'refresh' exercise was conducted on 15th May 2013 with assistance from Zurich Risk Engineering. This exercise was an opportunity for the Management Board to refresh (or update) through identification, analysis and prioritisation those risks that may affect the ability of the Council to achieve its strategic objectives and Corporate Plan. In doing so, the organisation is recognising the need to sustain risk management at the highest level.

The refresh exercise involved a workshop with Management Board to identify new business risk areas and to update and re-profile important risks from the existing corporate risk register.

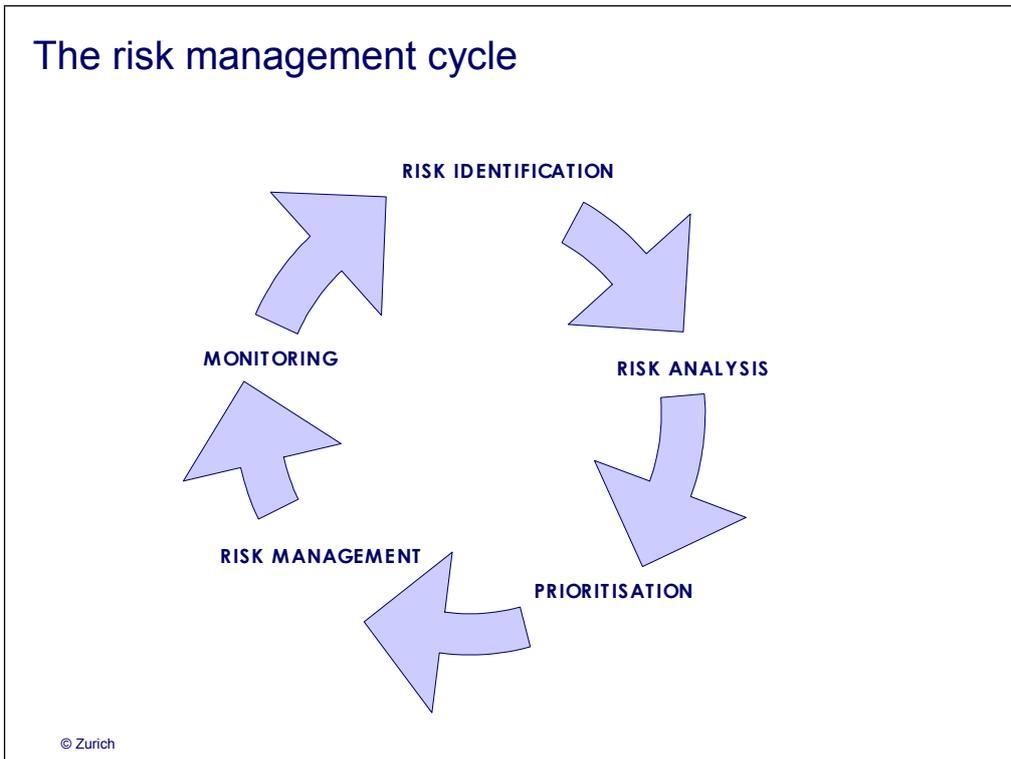
In total 8 strategic risks were profiled at the workshop and during the workshop, each risk was discussed to ensure common agreement and understanding of its description and then prioritised on a matrix. The risk matrix measured each risk for its likelihood and its impact in terms of its potential for affecting the ability of the organisation to achieve its objectives.

For the risks that were assessed with higher likelihood and impact, the group validated the risk scenarios and determined actions to manage them, including assessing the adequacy of existing actions and identifying the need for further actions in order to move the risk down the matrix.

Management Board agreed a timescale for re-visiting these risks in order to assess if they are still relevant and to identify new scenarios. Risks in the red zone will be monitored on a monthly basis and those in the amber zone on a quarterly basis.

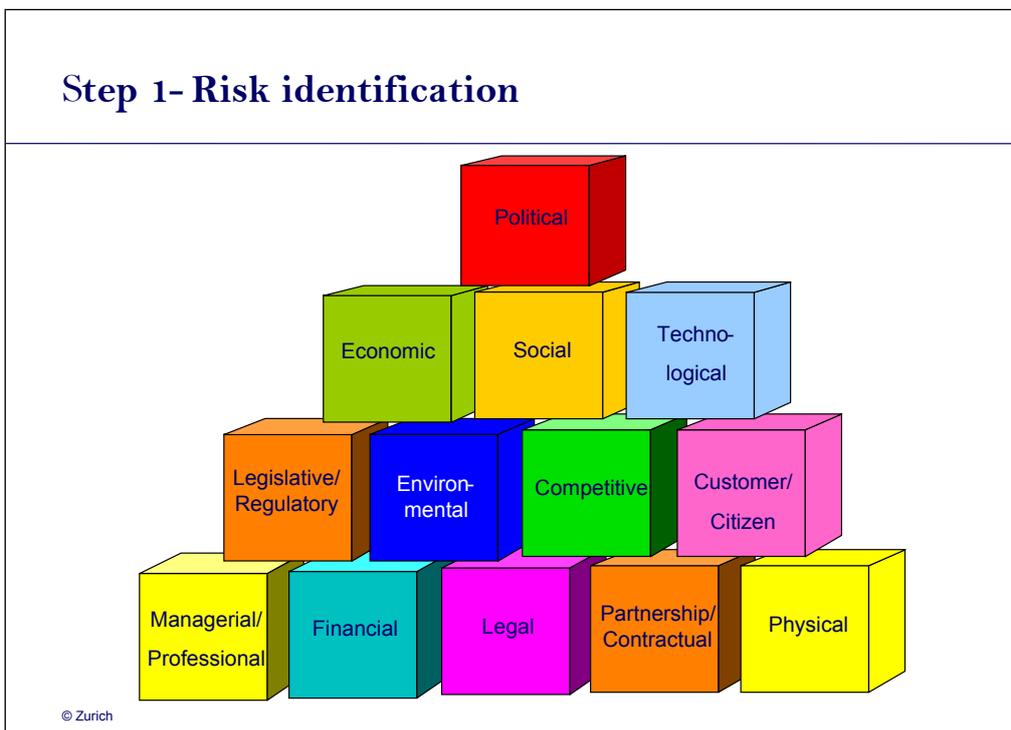
The following report outlines the process utilised by Zurich Risk Engineering and the results achieved.

2. The Process



Risk identification

The first of five stages of the risk management cycle requires risk identification. This formed the initial part of the workshop. In doing so the following 13 categories of risk were considered.



Risk analysis

During the workshop, the identified risks were discussed and framed into a risk scenario format, containing risk cause and consequence elements, with a 'trigger' also identified. This format ensured that the full nature of the risk was considered and also helped with the prioritisation of the risks.

Risk prioritisation

The discussion resulted in 8 risk scenarios being agreed (Appendix 2) and these were then assessed for impact and likelihood and plotted onto a matrix (Appendix 1). The likelihood of the risks was measured as being 'very high', 'high', 'medium', or 'low/very low'. The impact, compared against the key objectives and Corporate Plan was measured as being 'major', 'moderate', 'minor' or 'insignificant'.

Once all risks had been plotted the matrix was overlaid with red, amber and green filters, with those risks in the red area requiring further particular scrutiny in the short-term, followed by those in the amber area.

Risk management and monitoring

The next stage is to monitor the revised management action plans. These plans frame the risk management actions that are required. They map out the target for each risk i.e. to reduce the likelihood, impact or both. They also include targets and critical success factors to allow the risk management action to be monitored.

A risk owner has been identified for each risk. It is vital that each risk should be owned by a member of Management Board to ensure that there is high level support, understanding and monitoring of the work that is required as part of the plans. Risks should also be reviewed as part of the business planning process, in order to assess if they are still relevant and to identify new issues.

The monitoring of these action plans takes place at Corporate Governance Group, Management Board and the Risk Management Group. The action plans are also reported to Members quarterly.

As part of the regular review and reporting additional risks have been identified and added to the register, as shown in the table below.

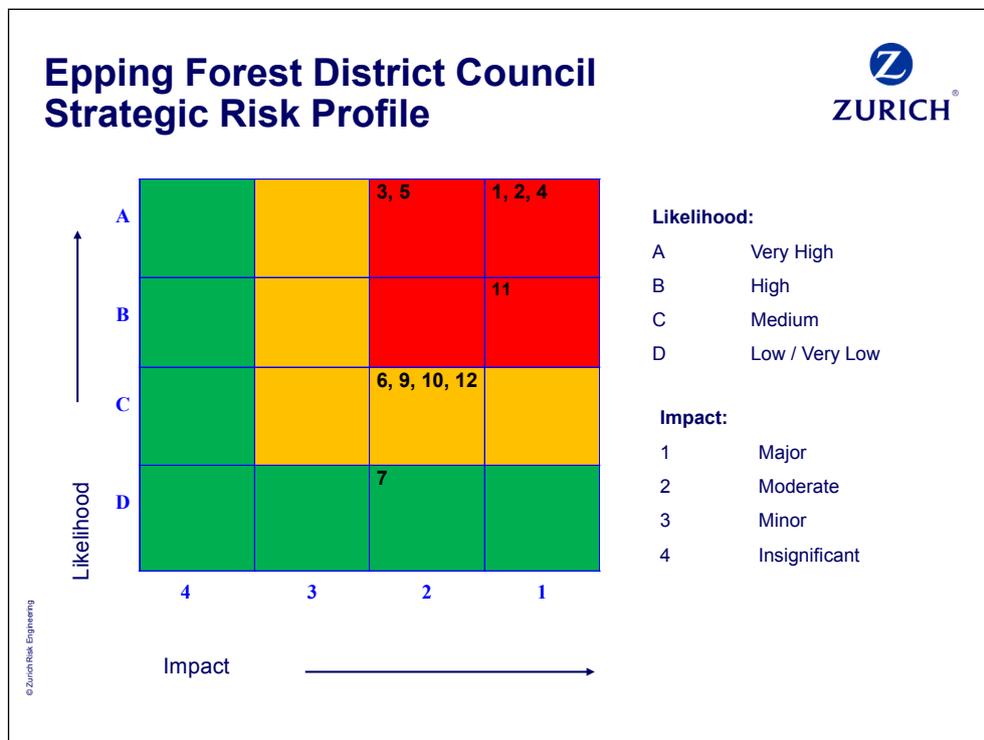
Risk number	Risk name	When added
9	Safeguarding	January 2014
10	Housing Capital Finance	June 2015
11	Transformation Programme	January 2018
12	Waste Management	June 2018

Risk 8 Partnerships – removed in September 2018.

Appendix 1 – Risk Profile

Risk profile

During the workshop, 8 risks were identified and framed into scenarios. The results are shown on the following risk profile.



Appendix 2 details all of the above risks.

It is important that an action plan element is written for each of the risks, with particular focus on those with the highest priority, as it is this which will allow them to be monitored and successfully managed down.

List of current Corporate Risks

Risk number	Short name
1	Local plan
2	Strategic sites
3	Welfare reform
4	Finance – income
5	Economic development
6	Data/ information
7	Business continuity
9	Safeguarding
10	Housing Capital
11	Transformation Programme
12	Waste Management

Appendix 2 – Corporate Risk Register and Action Plans

Risk No 1	Local Plan	A1		
Vulnerability	Trigger	Consequence	Risk Owner	
<p><i>Without an adopted Plan the introduction of the Housing Delivery Test from November 2018 and the Council's ability to deliver housing at the required rate will lead to the presumption in favour of sustainable development being applied and the requirement to prepare an action plan.</i></p> <p>Planning policy recruitment and retention issues. Not considering alternative options of delivering work i.e outsourcing/secondments.</p>	<p><i>The failure to deliver at the required threshold set out in the NPPF of 95% of the housing requirement over the previous three years triggers a requirement for the Council to prepare an action plan in line with national planning guidance to assess the causes of under delivery and identify actions to increase delivery. Although there are transitional arrangements with lower thresholds for November 2018 and 2019 results the delay in submitting the Plan as a result of the JR and Natural England's requirement not to issue planning decisions until a mitigation strategy is in place for Epping Forest SAC is likely to have ongoing consequences for delivery.</i></p> <p>Inability to fill vacancies.</p>	<p><i>Without an adopted plan setting the Council's housing requirement at 518 it is likely that the measurement used will be the 2014 household projection figures/standard method for assessment with an annual requirement of 923 homes. This will result in vulnerability to planning appeal decisions and potential development in the Green Belt as the presumption in favour of sustainable development will apply.</i></p> <p>Significant diversion of professional resources to appeals. Risk of costs awards against Council. Delays in achieving timetable.</p>	<p>Derek Macnab</p>	

Risk No 1 Local Plan – Action Plan

Existing Controls/actions to address risk	Effectiveness of controls/actions	Required further management action	Responsibility for action	Critical success factors and measures	Review frequency	Key date
<p>Local Plan Submission Version 2017 Agreed by Council 14 December 2017 and published between 18 December 2017 and 29 January 2018. Following JR decision on 20 September the plan has been submitted.</p>	<p><i>Key milestone to achieve new LDS is receipt of the Inspector's report following the examination in July 2019.</i></p>	<p><i>Preparation of hearing statements by agreed deadlines (set by Inspector) for hearings scheduled in February, March and May 2019.</i></p>	<p>Derek Macnab</p>	<p>Future adherence to project plan.</p>	<p>MB review 6 weekly</p>	<p>None – process ongoing.</p>
<p>Local Development Scheme (LDS) revised following submission of plan for independent examination.</p>	<p><i>Revised Local Development Scheme adopted by Local Plans Cabinet Committee on 22 November 2018.</i></p>	<p><i>Review progress against key milestones.</i></p>	<p>Derek Macnab</p>	<p>Adherence to revised LDS</p>	<p>MB review 6 weekly</p>	<p><i>Hearings scheduled in February, March and May 2019 and Inspectors report due July 2019.</i></p>

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Risk No 1 Local Plan – Action Plan						
Existing Controls/actions to address risk	Effectiveness of controls/actions	Required further management action	Responsibility for action	Critical success factors and measures	Review frequency	Key date
Systematic approach to Duty to Co-operate, engaging public bodies and developing Memorandum of Understanding (MoU)/Statements of Common Ground with statutory consultees to minimise issues to be subject of hearings.	Regular reports at officer and Member level through the Cooperation for Sustainable Development Group. <i>Draft Statements of Common Ground with statutory consultees being prepared.</i>	Important that key decisions do not precede Duty to Co-operate i.e. “fait accompli”.	Derek Macnab	Submitted plan passes legal test of Duty to Co-operate.	MB review six weekly	Officer Meetings – monthly now underway. Duty to Co-operate” Member meetings held regularly.
Development of mitigation strategy as set out in the MoU regarding the effect of development on Epping Forest SAC.	Regular meetings now held with key stakeholders to develop mitigation strategy. <i>Interim mitigation strategy now agreed by Council for recreational pressure on the Forest and Natural England have confirmed it is appropriate.</i>	<i>Need to obtain agreement with other competent authorities (London Borough of Waltham Forest and Redbridge) in order to progress final strategy. Also awaiting outcome of air quality modelling/transport modelling to develop air quality strategy which will need Natural England agreement.</i>	Derek Macnab	<i>Interim mitigation strategy in place for both recreational and air quality issues pending a full agreed strategy.</i>		<i>Agreed strategy by the end of 2019 (following visitor survey in June 2019).</i>
Consultants in place to support project management, resource planning, Sustainability Assessment, transport modelling, master planning.	Staff cannot be prevented from leaving. Exit interviews should reveal any specific patterns. Market is picking up, making recruitment very <i>challenging</i> . EFDC has offered market supplements on key posts to offer competitive salaries in a tight market.	Ongoing review of strategy by senior planners and <i>Leadership Team</i> . Scrutiny Function to be undertaken by Neighbourhood Select Committee.	Derek Macnab	No delays to timetable due to staffing gaps or lack of critical skills		

Risk No 2 Strategic Sites A1						
Vulnerability		Trigger		Consequence		Risk Owner
The Council has a number of Strategic sites which it needs to make the right decisions about and then deliver on those decisions.		Not maximising the opportunity of the strategic sites either through decisions or delivery. Loss of key officers.		<ul style="list-style-type: none"> Financial viability of Council harmed Lack of economic development and job creation External criticism Project delayed or mismanaged 		Derek Macnab
Existing Controls/actions to address risk	Effectiveness of controls/actions	Required further management action	Responsibility for action	Critical success factors and measures	Review frequency	Key date
Work on strategic sites is co-ordinated through a dedicated Cabinet Committee.	<p>Work is progressing on developing a number of sites:</p> <ol style="list-style-type: none"> Landmark/ former Winston Churchill. <i>Cabinet agreed supplementary Capital Expenditure of £140K to undertake separation and other service works to enable lettings to take place. Additional expenditure was also required for Legal Costs. As a result of delay, two perspective tenants have pulled out.</i> St Johns. <i>Failure to conclude negotiations with Frontier, has led to Council developing site in partnership with Epping Town Council. Decision taken to re-locate Epping Sports Centre to site.</i> Pyrles Lane Nursery, Cabinet agreed disposal strategy. <i>Sale agreed October 2018.</i> North Weald Airfield. Cabinet agreed letting to National Police Air Service (NPAS) and construction has started on site. 	<p><i>Undertake building alterations. Re-market vacant units.</i></p> <p><i>Development appraisal required. New layout to be developed to include Leisure Centre. Application for Demolition of non-heritage buildings to be re-submitted.</i></p> <p><i>Nursery Services to re-locate to Town Mead. Completion of sale by end of financial year.</i></p> <p><i>Complete letting of site to NPAS. Full relocation of model flying club to reduce risk.</i></p>	Derek Macnab	Development of strategic sites completed in accordance with Cabinet decisions.	Monthly	None

Risk No 3 Welfare Reform A2						
Vulnerability		Trigger		Consequence		Risk Owner
<p>The government has pledged to make substantial savings from the overall welfare bill. This will require a major reform of the welfare system which is likely to have serious impacts on the Council and the community. This includes Universal Credit, changes to Council Tax and other benefits and direct payments to tenants.</p>		<p>Welfare reform changes have a detrimental effect on the Council and community</p>		<ul style="list-style-type: none"> • Tenants no longer able to afford current/new tenancies. • Increase in evictions and homelessness • Increased costs of temporary accommodation • Unable to secure similar level of income due to payment defaults • Increase in rent <i>and Council Tax</i> arrears • Public dissatisfaction • Criticism of the Council for not mitigating the effects for residents. 		<p><i>Rob Pavey</i></p>
Existing Controls /actions to address risk	Effectiveness of controls/actions	Required further management action	Responsibility for action	Critical success factors and measures	Review frequency	Key date
<p><i>Cross-service working group established to assess impacts of the introduction of Universal Credit and to produce an action plan to mitigate the effects.</i></p> <p>15 09 121</p>	<p><i>To be determined in 2019/20.</i></p>	<p><i>Working Group to be created to meet on a regular basis.</i></p> <p><i>Action Plan to be developed by the end of 2019/20 by baselining the effects of Universal Credit for implementation in 2020/21.</i></p>	<p><i>Rob Pavey</i></p>	<p>A smooth implementation of welfare reforms.</p> <p>Minimise number and cost of redundancies.</p>	<p>Monthly</p>	<p><i>31 March 2019</i></p>

Risk No 4 Finance Income A1						
Vulnerability		Trigger	Consequence			Risk Owner
<p><i>Local Authorities are increasingly dependant on locally generated income and from 2020/21 onwards there is little information on funding. The Fair Funding review will look at how business rate income is distributed amongst authorities but it is unlikely this authority will see any increase in real terms unless additional responsibilities are passed on as a result.</i></p> <p>There is still a large number of rating appeals received where the outcome is uncertain.</p> <p><i>With the increasing possibility of a no deal Brexit, a number of income sources could be adversely affected. The Council is heavily reliant on income from commercial rentals and it is possible that businesses will find trading conditions more challenging and insolvency may become more common. This of course also affects business rates.</i></p> <p>The medium term financial strategy requires substantial net CSB reductions over three years.</p>		<p>Unable to secure required level of income due to reduced demand for services, changes in legislation, <i>changes in economic conditions</i> or adverse change in funding mechanisms.</p>	<ul style="list-style-type: none"> • Council unable to meet budget requirements • Staffing and service level reductions • Increase Council Tax • Increase in charges • Greater use of reserves if required net savings not achieved • Higher level of saving in subsequent years. 			Peter Maddock
Existing Controls /actions to address risk	Effectiveness of controls/actions	Required further management action	Responsibility for action	Critical success factors and measures	Review frequency	Key date
<p>Monitoring of key income streams and NDR tax base. Savings opportunities pursued through service reviews and corporate restructure.</p>	<p>Effective to date as budgets have been achieved that meet the financial targets set by Members. <i>This will however become increasingly challenging over time.</i></p>	<p>Update Medium Term Financial Strategy as announcements are made on changes to central funding and welfare.</p> <p>Continue to pursue opportunities to reduce net spending.</p>	Peter Maddock	<p>Savings targets achieved with net expenditure reductions over the medium term as part of a structured plan. <i>People Strategy for 2018/19 now achieved.</i></p>	Monthly	21 February 2019, budget to Council.

Risk No 5 Economic Development A2						
Vulnerability		Trigger	Consequence			Risk Owner
Economic development and employment is very important, particularly in the current economic climate. The Council needs to be able to provide opportunities for economic development and employment (especially youth employment) in the District.		Council performs relatively poorly compared to other authorities.	<ul style="list-style-type: none"> • Unable to secure sufficient opportunities • Local area and people lose out • Insufficient inward investment • Impact on economic vitality of area • Loss of revenue 			Julie Chandler
Existing Controls/actions to address risk	Effectiveness of controls/actions	Required further management action	Responsibility for action	Critical success factors and measures	Review frequency	Key date
<i>Economic Development Plan has been drafted and presented to Economic Development Board. Final work being undertaken to complete plan and develop Implementation Plan. Following a resignation within the core EDev Team consideration being given to appoint additional member of staff on a fixed-term basis to complete this work in conjunction with remainder EDev team.</i>	Too early to determine effectiveness.	<i>Completion of final amendments and items related to Local Plan.</i> <i>Publish strategy.</i> <i>Produce EDev Implementation Plan.</i>	Julie Chandler	Growth in NDR tax base and employment opportunities. Improved opportunities for skills development in conjunction with NCC. Council to be viewed as punching above its weight.	Monthly	March 2019

Risk No 6 Data / Information C2						
Vulnerability		Trigger	Consequence			Risk Owner
The Authority handles a large amount of personal and business data. Either through hacking or carelessness, security of the data could be compromised.		Data held by the Council ends up in inappropriate hands.	<ul style="list-style-type: none"> • Breach of corporate governance • Increased costs and legal implications • Reputation damaged 			Rob Pavey
Existing Controls/actions to address risk	Effectiveness of controls/actions	Required further management action	Responsibility for action	Critical success factors and measures	Review frequency	Key date
<p>Updated Data Protection policy agreed by Corporate Governance Group and rolling out through meta-compliance.</p> <p>Data Protection formed part of Member induction from May 2014, with requirement to confirm acceptance of the Council's DP policy.</p> <p>Consolidation of Data Protection and Freedom of Information work in one area.</p> <p>Security Officer is continually monitoring situation and potential risks. Most systems have in built controls to prevent unauthorised access.</p> <p>Controls in systems have been strengthened in response to specific occurrences.</p> <p>New system for handling F.O.I. requests now implemented.</p> <p>Data retention policies on the Council intranet.</p>	Generally effective to date, with no significant lapses so far in 2018/19.	<p>Update F.O.I. publication scheme and guide to information.</p> <p>Data sharing and fair processing notices to be reviewed and standardised.</p> <p>Maintain GCSx compliance and system controls.</p>	Rob Pavey	<p>Continued security of personal data held by the Council in accordance with the Data Protections Act 1998.</p> <p>No criticism from the ICO over how requests are handled.</p> <p>No data loss or system downtime due to unauthorised access of EFDC systems or data.</p>	Quarterly	None

Risk No 7 Business Continuity D2						
Vulnerability		Trigger	Consequence			Risk Owner
<p>The Council is required to develop and implement robust Business Continuity Plans in line with the requirements of the Civil Contingencies Act.</p> <p>Following the re-organisation plans will need to be updated and changes in responsibilities confirmed.</p>		<p>Unable to respond effectively to a business continuity incident (e.g. IT virus/flu pandemic)</p>	<ul style="list-style-type: none"> • Services disrupted / Loss of service • Possible loss of income • Staff absence • Hardship for some of the community • Council criticised for not responding effectively 			Derek Macnab
Existing Controls/actions to address risk	Effectiveness of controls/actions	Required further management action	Responsibility for action	Critical success factors and measures	Review frequency	Key date
<p>Most services already have business continuity plans in place and a separate flu pandemic plan has been developed.</p> <p>The Corporate Plan has been updated and adopted.</p>	<p><i>Audit of Business Continuity arrangements has commenced.</i></p>	<p>Guidance to be issued to services on updating plans.</p> <p>Arrange periodic tests and exercises.</p>	Derek Macnab	<p>Having plans in place which are proved fit for purpose either by events or external scrutiny.</p>	Quarterly	None

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Risk No 9 Safeguarding C2			
Vulnerability	Trigger	Consequence	Risk Owner
<p>The Council needs to demonstrate its ability to meet its duties under Sections 11 and 47 of the Children Act 2004 and the Care Act 2014, which refer to adults with needs for care and support. This includes a specific responsibility for safeguarding adults from self-neglect.</p>	<p>The Council fails to meet its duties in regard to safeguarding children, young people and adults with needs for care and support.</p>	<ul style="list-style-type: none"> • A child, young person or vulnerable adult suffers significant harm • A child, young person or vulnerable adult suffers from exploitation • Avoidable death of a child, young person or vulnerable adult living in the District • Reputational risk for Council • Censure and special measures applied 	<p>Julie Chandler</p>

Risk No 9 Safeguarding - Action Plan

Existing Controls/ actions to address risk	Effectiveness of controls/actions	Required further management action	Responsibility for action	Critical success factors and measures	Review frequency	Key date
<p>The Council has a Safeguarding Policy (2018), updated in line with new legislation. The policy details what is required of all staff and Elected Members and is supported by a set of procedures which set out the process for recording safeguarding concerns, incidents and allegations.</p> <p>A corporate Safeguarding Group ensures sharing of best practice and information across Directorates and enables the identification of any weaknesses in the Council's work.</p> <p>Council policies have been developed for all new and emerging safeguarding issues such as Child Sexual Exploitation (CSE).</p> <p>A Safeguarding Strategy and Action Plan has been adopted by Cabinet.</p> <p>A bespoke Basic Safeguarding Awareness e-learning training resource has been developed and all staff and Members are required to undertake this.</p> <p>An EFDC bespoke 'Enhanced' safeguarding training session has been developed, <i>which commenced roll out in October 18 and is being provided to all staff in the council who have direct contact with the public.</i></p> <p>The Council will be producing a violence and Vulnerability action plan in 2019.</p>	<p>The Council has reduced the risk of safeguarding issues going unnoticed by staff and Elected Members by developing a new programme of training and production of the new Policy and procedures 2018.</p> <p>This group has become an effective forum for sharing of best practice and commitment from all Directorates is shown.</p> <p>Several of these policies have been used across Essex as examples of best practice.</p> <p>These documents set out areas requiring further improvement.</p> <p><i>All staff are required to undertake this training and Managers are responsible for monitoring this.</i></p> <p>The Safeguarding 'Hub' enables all EFDC safeguarding issues to be reported and dealt with efficiently.</p>	<p>Leadership Team and Managers to continue to promote vigilance amongst staff.</p> <p>The Council needs to ensure timely response to changes in legislation or local procedures.</p> <p>Directorates need to continue to commit time for representatives to attend the Corporate Working Group.</p> <p><i>Training records to be held and maintained centrally by the People Team on the iTrent system when it is fully operational.</i></p>	<p>Julie Chandler</p>	<p>The Council meets all of its duties for safeguarding children under Section 11 and 47 of the Safeguarding Act 2004.</p> <p>The Council meets the new duties of the Care Act 2014.</p> <p>The Council fully meets all aspects of the ESCB Section 11 and ESAB Safeguarding self - assessment.</p>	<p>Quarterly</p>	<p>Annual submission of ESAB/ESCB Audits.</p>

Risk No 10 Housing Capital Finance C2						
Vulnerability		Trigger		Consequence		Risk Owner
<p>If the Council is unable to spend right to buy receipts in set timescale on qualifying capital schemes we will have to pay the money to the Government along with interest at a penalty rate.</p> <p>Changes to legislation which reduce income to the HRA.</p>		<p>Schemes are delayed by either the planning process or unanticipated site problems.</p> <p>Imposition of further restrictions on rent levels.</p>		<ul style="list-style-type: none"> • Loss of capital resources • Revenues cost of penalty interest • Loss of rental income • Delays in provision of new social housing • Increase in housing waiting list • Current 30 year business plan may become unsustainable. 		Paul Pledger
Existing Controls/actions to address risk	Effectiveness of controls/actions	Required further management action	Responsibility for action	Critical success factors and measures	Review frequency	Key date
<p>Position being monitored by the House Building Cabinet Committee and a number of contingency options are available including purchasing on the open market.</p> <p>The Council belongs to the Association of Retained Council Housing which lobbies on such issues.</p>	<p>Effective to date.</p> <p>Effective to date. Other issues may arise in the future though.</p>	<p>Continue close monitoring of financial position.</p> <p>Keeping Members fully informed of the potential consequences of their actions.</p> <p>Monitor policy developments/announcements and participate in lobbying if appropriate.</p> <p>The risk to spending our 1-4-1 receipts is being monitored on a quarterly basis.</p>	<p>Paul Pledger</p> <p>Paul Pledger</p>	<p>Loss of right to buy receipts is minimised.</p> <p>Impact of Policy changes is minimised as far as possible.</p>	<p>Monthly</p> <p>Monthly</p>	<p>Ongoing</p>

Risk No 11 Transformation Programme B1						
Vulnerability		Trigger		Consequence		Risk Owner
<p>The Council has embarked on a major programme to modernise working practices and improve efficiency. The three key projects within the programme are people, accommodation and ICT. These are all challenging pieces of work and if any of them fail or are significantly delayed the whole programme may collapse.</p>		<p>There are many issues with the potential to disrupt one or more of the projects. Each project requires resourcing financially and with staff time. Loss of a key individual or a lack of finance would make delivery difficult.</p> <p>Restrictive listing of offices could obstruct the work on accommodation.</p>		<ul style="list-style-type: none"> • Service improvements not achieved for residents. • Improvements in efficiency not delivered. • Pressure on future budgets. • Reputational damage to the Council. 		Derek Macnab
Existing Controls /actions to address risk	Effectiveness of controls/actions	Required further management action	Responsibility for action	Critical success factors and measures	Review frequency	Key date
<p><i>New Leadership Team considering Transformation issues at their weekly meetings.</i></p>	<p>ICT and People strategies approved by Cabinet and progressing.</p> <p><i>People Strategy at L2 Service Manager Implementation Stage.</i></p> <p><i>People Strategy due to be considered by O & S in December 2018.</i></p> <p><i>Cabinet agreed revised Accommodation Strategy on 10 December 2018.</i></p>	<p><i>Leadership Team. TPB to continue to monitor projects and ensure adequate human and financial resource available.</i></p> <p><i>Task & Finish Panel to be established to cover Performance Reporting.</i></p>	Derek Macnab	<p>Projects delivered on time and in budget with full benefits realisation.</p> <p>Detailed success factors and measures are set out in the project management documents for each project.</p>	Monthly	Key dates are set out in the project management documents for each project.

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Risk No 12 Waste Management C2						
Vulnerability		Trigger		Consequence		Risk Owner
<p>Inability of the Council's partnering contractor, Biffa Municipal Limited to secure profitable outlets for recycling materials processed through the Material Recycling Facility (MRF) could result in diminishing income.</p>		<p>There has been significant drop in income from the sale of recycling materials especially paper, caused primarily by the Chinese government decision to ban import of MRF paper. This has resulted in saturation in the commodity markets.</p>		<ul style="list-style-type: none"> • Reputational damage to the Council if recycling materials is sent to landfill. • Additional costs to the Council if Biffa cannot sell materials. • Additional costs under pain/gain share mechanism in the contract if the income from recycling continues to drop or worst case becomes a cost. 		<p><i>Qasim Durrani</i></p>
Existing Controls /actions to address risk	Effectiveness of controls/actions	Required further management action	Responsibility for action	Critical success factors and measures	Review frequency	Key date
<p>Financial settlement is being agreed with Biffa to mitigate some of the costs arising from the increased costs of processing and the capital investment incurred to improve the quality of recycling output from the Biffa MRF.</p>	<p>Dependent, to a large extent, on the market forces in the case of commodity prices.</p> <p><i>Due to volatility of sale prices of recycling materials the contractual arrangement of Recycling Index Unit Rate (RIUR) is to be continued to be monitored closely.</i></p>	<p>Management Board to continue to monitor the costs and market fluctuations.</p>	<p><i>Qasim Durrani</i></p>	<p>RIUR reviews result in increased income.</p> <p>Difficulties in selling recycling materials is identified early.</p>	<p>Monthly</p>	<p><i>Ongoing</i></p>