Strategic Risk Register Update – Quarter 3, 2024/25   APPENDIX 1

Strategic Risk Register Heat Map

The Heat Map provides an overview of the cumulative position of Current Risk Scores following the latest Risk Review.

The summary below details the separate Corporate Risk Themes with the associated individual risk scores following the latest Risk Review.

Risk Code	Corporate Risk Theme	Corporate Priority Links*	Original Risk Score	Current Risk Score	Target Risk Score
SRR-01	Financial Sustainability	1, 2, 3, 4	20	16	12
SRR-02	Organisation's Internal Capacity to Deliver	1, 2, 3	16	20	6
SRR-02b	Organisation's Internal Capacity to Deliver (Local Waste Transfer Station Closures)	1, 2	20	16	12
SRR-03a	Effective Information Governance Arrangements	1, 2	16	12	6
SRR-03b	Effective ICT Systems and Cyber Security arrangements	1, 2	16	12	6
SRR-04	Delivery of the Local Plan	3	9	16	9
SRR-05	Effective Contract Performance Management - Liberata UK	1	16	12	6
SRR-06	Delivery of key Government Programmes and Major Capital Projects	3	16	12	9
SRR-07	Political Balance / Stability	1	16	12	9
SRR-08	Ability to deal with extreme weather and civil contingencies (such as a pandemic)	1	16	12	9
SRR-09	Achievement of carbon neutral targets by 2030	2, 3	20	20	16
SRR-10	Safeguarding of residents	2, 4	9	9	4

Risk Code	Corporate Risk Theme	Corporate Priority Links*	Original Risk Score	Current Risk Score	Target Risk Score
SRR-11	Public Health and Wellbeing	3, 4	16	12	9
SRR-12	Local Workforce Skills development	3	16	6	9
SRR-13	Leisure Review	1, 4	9	12	6
SRR-14	Joint Venture Companies	3	20	16	9

*Corporate Priority Links Key:
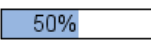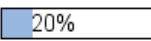
Corporate Priority Reference	Corporate Priority Description
1	Priority 1: Providing High Quality Services and Facilities
2	Priority 2: Proud and Connected Communities and Places
3	Priority 3: Good Growth
4	Priority 4: Healthy Communities

For further details and information related to the Council's Corporate Plan, please click here.

SRR - Detailed Update

SRR-01 Financial Sustainability

Risk Owner	Karen Spencer - Director of Resources

The Council's ability to set a balanced Medium-Term Forecast and annual revenue and capital budgets. Local Government cannot control its income levels which are predominately set by Central Government. This limits the extent to which the Authority can respond to its financial constraints. As a result this risk must be carefully monitored to ensure sufficient controls are in place.

An unbalanced budget could potentially lead to failures to deliver on key projects, outcomes for residents or the filing of Section 114 Notice.

Original Risk Score	Current Risk Score	Target Risk Score
20	16	12

Impact Scores	5 - Catastrophic	4 - Major	4 - Major
Likelihood Scores	4 - Likely	4 - Likely	3 - Moderate

Causes	Consequences	Internal Controls & Mitigations
. Central Government funding policy and level of grant funding payable to Local Government. . Impact of Cost-of-Living Crisis on residents and ability to generate Council Tax. . Cap on Council Tax increases. . Management of external factors such as inflation rates, borrowing costs and energy costs, etc. . High levels of pay inflation.	. Council Budget is set with use of Reserves required to bridge funding gap. . Reduction in Council Reserves year on year. . Potential Section 114 Notice requirement in future years. . Additional scrutiny from Central Government.	. Monthly budget monitoring undertaken by budget manager and service accountant . Capital and Revenue Budget monitoring reported to Executive quarterly . Treasury Management Reports presented to Accounts & Audit Committee, Executive and Council . MTFP report updated bi-annually and submitted to Executive and Full Council in February each year . Daily Treasury management reviews to ensure best returns on cash balances are achieved . Debt management policy in place - linked to Treasury management . Capital Appraisal documents completed for all new capital schemes as part of the budget setting process . Section 151 Officer sign off for Robustness of Estimates, Statement of Accounts and Grant Returns . Annual finance training to Budget Holders, managers and members (When / frequency) . Contingency arrangements built into financial planning &

					Management routines. . Continuous improvement programme in place to drive efficiencies . Fees and charges policy reviewed and approved annually . Cross-party Budget Working Group meet monthly to review budget proposals in build-up to budget setting and February MTFP review

Linked Actions					
SRR-01.10 Review of capital financing requirement and capital programme	🛑	50%	Gemma-Louise Wells	30-Sep-2024	Why is the action red, amber or green? This action continues to progress. What are you doing to maintain or improve the situation? Capital programme was agreed at the Feb 2024 council meeting and monitoring is ongoing. Capital financing requirement is reviewed with treasury consultants once draft statements of accounts is produced.
SRR-01.11 Review of JVs.	🛑	20%	Gemma-Louise Wells	30-Sep-2024	Why is the action red, amber or green? The report has been commissioned with the first draft having been due by the end of September 2024. The report has been delayed and is now expected by the end of October. What are you doing to maintain or improve the situation? The findings and any proposed actions will be reported to Council in due course.

Latest Note
Quarter 3 2024/25 Review - This risk score has not changed since the last assessment and remains high. There are a number of external and internal factors impacting this risk. The provisional local government finance settlement was released in December 2024. The Council is currently developing it budget for 25/26 and MTFP.

SRR-02 Organisation's Internal Capacity to Deliver

Risk Owner	Rose Rouse - Chief Executive / Karen Spencer - Director of Resources / Phillip Spurr - Director of Place

The Council's ability to deliver critical services due to staff vacancies, turnover and absence and ineffective decision-making processes. Ability to recruit and retain the right people with the right skills and behaviours in the right job at the right time. The wider employment market that Local Authorities operate in and skill shortage in some areas has increased staff turnover in key areas.

Not maintaining sufficient capacity to deliver key projects will have an impact on the council's ability to carry out its basic statutory functions, outcomes for residents, the mental and physical wellbeing of staff and could contribute to an increase in staff turnover.

Original Risk Score	Current Risk Score	Target Risk Score
16	20	6

Impact Scores	4 - Major	4 - Major	3 - Moderate
Likelihood Scores	4 - Likely	5 - Almost Certain	2 - Unlikely

Causes	Consequences	Internal Controls & Mitigations
Wider macro-economic factors post Covid. Cost of living crisis forces staff to look for new roles. Certain key skills in shortage across the market. Higher % of vacancies in some departments. High % of temporary staff in some departments Long term absence rate increase. Inability to compete with Private Sector salaries	Failure to deliver on statutory duty. Failure to deliver on key projects such as the UK Shared Prosperity Fund, Nelson Town Deal and Colne Levelling Up. Become a designated planning authority. Potential Food Standards Agency intervention Loss of staff.	. Quarterly Performance Clinics monitor capacity and performance, flagging up any issues impacting on the Council's ability to deliver its Corporate Plan. . CLT discusses and makes key decisions on staffing matters following Performance Clinics . Regular Portfolio Holder Briefings held keeping Members informed of current activity / developments which can impact on capacity . Workforce Strategy in place to enable improved long term planning of the Council's workforce and which focusses developing and retaining our current workforce and how we encourage new talent. . Personal Development Review process which identifies skills gaps within the organisation and promotes development. . Employee Benefits Programme in place that promotes staff welfare / health & wellbeing and aids retention. This includes the Employee Assistance Programme (EAP), VIVUP benefits package and AVCwise. . Attendance Policy in place with compliance monitored to ensure remedial action taken where necessary. Regular training is delivered to managers to support this.

			. Corporate Plan communicated with staff so they have a clear understanding of their contributions to the Council's priorities. . Staff Engagement Sessions and Briefings to keep staff involved and informed. . Use of consultants / agency staff to deliver key projects whilst vacancies are filled. . Dynamic IT and Digital Strategies in place to support hybrid working . Effective Utilisation of Apprenticeship Levy year on year.

Linked Actions					
SRR-02.03 Review the IT Strategy	▶	0%	Sarah Astin-Wood	31-Mar-2025	
SRR-02.08 Recruit new Chief Executive	▶	0%	Karen Spencer; Phillip Spurr	24-Mar-2025	

Latest Note
Quarter 3 2024/25 Review - Current Risk Score has increased from 12 to 20. There are still vacancies in key services areas, HoS are working to fill these. Chief Executive is due to leave March 2025. Recruitment process is yet to progress.

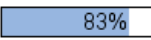## SRR-02b Organisation's Internal Capacity to Deliver (Local Waste Transfer Station Closures)

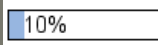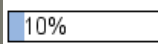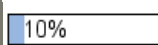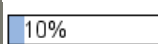| Risk Owner	David Walker - Assistant Director - Operational Services

The council's ability to dispose of its waste despite the forecast closure of the Whinny Hill Waste Transfer Site. The Councils ability to economically and environmentally remove and dispose of waste. Development of a new local Waste Transfer before the closure of the Whinny Hill Waste Transfer site.

Failure to manage this risk will result in a sharp and likely unsustainable increase in costs for the Council.

Original Risk Score	Current Risk Score	Target Risk Score
20	**16**	**12**

Impact Scores	4 - Major	4 - Major	4 - Major
Likelihood Scores	5 - Almost Certain	4 - Likely	3 - Moderate

Causes	Consequences	Internal Controls & Mitigations
The County Council's agreement with SUEZ will be ending on the 31st March 2026. This closure will have significant cost implications for PBC and neighbouring authorities who would be forced to make much longer trips to the next closest Waste Transfer Stations.	If we do nothing this will incur significant additional costs to the Council due to having to transfer waste to the Farington facility, Leyland.	This risk is being "treated" through an active approach. The Council is actively looking to reduce and manage the risk for the duration of its lifetime until a new Waste Transfer Station is open. The Council is currently looking to develop its own waste transfer station in partnership with Burnley to reduce costs to the Council which should be operational in conjunction with the April 2026 deadline.

Linked Actions				
CP24 1.10 Waste and Recycling	▶	83%	David Walker	31-Mar-2025

Why is the action red, amber or green?
This priority is green and on target for delivery. 3/5 milestones have already been completed and good progress has been made towards to completion of the final two.

What are you doing to maintain or improve the situation?
Members are receiving weekly updates on the progress towards achieving both planning and permit approval. These updates will continue for the duration of the Corporate Plan period.

Confirmation has also recently been received from LCC (3rd December 2024) that they will provide containers for the bulking

					and transportation of food waste to Farington from April 2026. This has further progressed this milestone.
SRR-02b.04 Pursue joint delivery of a Waste Transfer Site with Burnley Council	▶	10%	David Walker	31-Mar-2026	Please refer to commentary on SRR-02b
SRR-02b.05 Secure the sale of land for a new Waste Transfer Site	▶	10%	David Walker	31-Mar-2026	Please refer to commentary on SRR-02b
SRR-02b.06 Agree an arrangement for the running of the new Waste Transfer Site	▶	10%	David Walker	31-Mar-2026	Please refer to commentary on SRR-02b
SRR-02b.07 Receive Planning permission for a new Waste Transfer Site	▶	10%	David Walker	31-Mar-2026	Please refer to commentary on SRR-02b

Latest Note

Quarter 3 2024/25 Review - Risk scores reviewed by Risk Owner which has seen the current Risk Score increase from 12 to 16 due to the steps which need to be overcome for a new site to be operational by the April 2026 deadline. Please refer below.

Extension of existing site has now been confirmed by LCC until 2026.
PBC, with Burnley Council, are continuing to pursue joint delivery of a new Waste Transfer Site.
There are a number of steps to overcome before any new site will become operational (planning, permitting, Highways, Land Sale). This is achievable but will be a challenge given the 2026 deadline and given the number of externally controlled factors. Accessible Nelson design has potential to impact on the design of the Waste Transfer Station where its land borders the highway at Scotland Road and Charles Street. Ongoing discussions with LCC highways being held. Discussion has impacted on planning application submission.
Project planned for submission by Late December. Possible planning submission in February 2025.

SRR-03a Effective Information Governance Arrangements

Risk Owner	Howard Culshaw - Head of Legal & Democratic Services

To ensure effective information governance arrangements are in place to make sure that personal data is secure and that an individual's right to privacy is protected. This includes our staff and the workplace.

Effective controls in this area can prevent cyber security incidents and regulatory breaches, as well as facilitate business continuity, disater recovery, risk identification and mitigation across the organisation.

Failure to manage this risk effectively can lead to significant potential and reputational damage.

Original Risk Score	Current Risk Score	Target Risk Score
16	12	6

Impact Scores	4 - Major	4 - Major	3 - Moderate
Likelihood Scores	4 - Likely	3 - Moderate	2 - Unlikely

Causes	Consequences	Internal Controls & Mitigations
. Lack of dedicated resource with the relevant skills and experience designated to manage Information Governance across the Council. . Ineffective information governance arrangements, such as poor quality, out-dated or non-existent necessary documentation, e.g. ROPA, IAR, and Data Flow Maps. . Human error due to a lack of awareness, training and resource. . Weak information governance culture within the organisation. . Inadequate risk management arrangements around information governance risk identification, assessment and analysis. . Lack of robust processes for identification and management of third parties with access to council data, or processing council data; including due diligence processes for engaging suppliers, ensuring GDPR compliant contracts and robust contract compliance arrangements.	. Non-compliance with legal standards, such as General Data Protection Regulations (GDPR) 2018 posing increased risk to the confidentiality, integrity and security of PBC data. . Financial and/or reputational damage to the Council. . Inability to respond effectively in the event of a cyber-attack or loss of data. . Weak information governance culture within the organisation. . Data Protection Breach. . Data Retention Breach. . Lack of understanding what information assets the Council has, how they are secured, who has access to them and the lawful basis for processing.	• **Corporate Governance Steering Group (CGSG)** in place which meets bi-monthly and where information Governance is a standing agenda item. • Chair of the CGSG is the Council's Head of Legal & Democratic Services who also assumes the role of Data Protection Officer (DPO) and Monitoring Officer (MO). • The Council has a Cyber and Information Security training platform (KnowBe4 - KB4) through which an annual training programme is devised and delivered as mandatory training and includes phishing tests throughout the year. • Bi-annual KB4 Management Group meetings take place which includes representatives from Pendle Leisure Trust (PLT) & Liberata IT Services. • KB4 training compliance is reported to Heads of Service monthly and to the CGSG at least 6mthly. • Information Security Handbook in place which is regularly reviewed to account for changes in policy - last formally reviewed in June 2024 and currently under review in January 2025.

				• DPO Record of Disclosure in place.
				• BC & DR plans regularly tested and reviewed.
				• Privacy Notice in place for both **employees** and **customers**.

Linked Actions					
SRR-03.03 Information Asset Register (IAR) and Record of Processing Activity (ROPA) to be reviewed and updated	▶	0%	Howard Culshaw	31-Mar-2025	**Why is the action red, amber or green?** This action is green and on target based on having slipped the delivery dates for the audit recommendations due to capacity and resource issues. **What are you doing to maintain or improve the situation?** MIAA has been commissioned to deliver on the actions identified in their Audit Report and whilst initial progress has been slow progress is underway. The Auditor has issued out the existing but outdated ROPA to Heads of Service for review and comment. A progress review meeting is scheduled with MIAA for 24th January 2025. Work is also underway on an applications / systems spreadsheet which will be incorporated into the ROPA / developed as a standalone IAR.
SRR-03.04 Annual plan to be devised for BCP and IT Disaster Recovery Plan testing	⬣	70%	Howard Culshaw	31-Dec-2024	**Why is the action red, amber or green?** This action is currently Red due to the BC/DR exercise planned for November having to be rescheduled for 16th January 2025 due to key staff availability. **What are you doing to maintain or improve the situation?** The desktop exercise is going ahead on the 16th Jan with planning sessions having been undertaken beforehand and exercise documentation developed in line with NCSC guidance / documents. The scenario is testing the Council's and Liberata IT arrangements in the event of a ransomware attack targeted at the Elections team / process. Lessons will be learned from this exercise and then a live test will be developed to take place later in 2025. Work to be undertaken after this exercise is to also develop an

					annual testing plan.

Latest Note
New risk due to SRR-03 (Effective ICT Systems and Cyber Security and Information Governance) risk being split into two separate strategic risks: - SRR-03a - Effective Information Governance arrangements - SRR-03b - Effective ICT systems and Cyber Security arrangements Work is underway to deliver the mitigating actions related to this risk and the internal audit recommendations.

SRR-03b Effective ICT Systems and Cyber Security arrangements

Risk Owner	Karen Spencer - Director of Resources / Sarah Astin-Wood - Head of Policy & Commissioning

The Council's ability to successfully utilise and exploit its IT systems and information assets.

To minimise the Council's cyber risk and ensure the operational resilience in the event of an incident. The Council operates within a wider cyber security context and cannot directly control the level of threat posed.
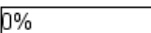
Failure to manage this risk will lead to reductions in efficiency / capacity and ability to respond effectively in the event of a cyber incident, as well as significant potential financial and reputational damage.

Original Risk Score		Current Risk Score	Target Risk Score
16		12	6
Impact Scores	4 - Major	4 - Major	3 - Moderate
Likelihood Scores	4 - Likely	3 - Moderate	2 - Unlikely

Causes	Consequences	Internal Controls & Mitigations
Cyber Security incident affects Council's ability to deliver critical services. Ineffective operational resilience. Human error due to a lack of awareness, training and resource. Owners / administrators and deputies not identified for key systems.	Cyber security incident resulting in loss of data, systems and / or reputational damage. IT systems not being used to their full potential, impacting on resource and resilience. Inability to respond effectively to system upgrades, management, maintenance and development. Lack of understanding what information assets the Council has, how they are secured and who has access to them.	. **BCP & DR plan regularly tested and reviewed** . The Council has a Cyber and information Security Training Platform (KnowBe4 – KB4) and an annual KB4 training programme is devised and delivered, including phishing tests. . KB4 training compliance is reported Heads of Service monthly and to the CGSG at least 6mthly. . Bi-annual KB4 Management Group meetings take place which includes reps from Pendle Leisure Trust (PLT) & Liberata IT Services . Information Security Handbook in place - last reviewed in June 2024. . Constant KB4 Phishing "dip test" conducted and reported to managers . Monthly IT Programme Board governance meetings take place between PBC and Liberata IT Services . Monthly PSG Meetings take place where the IT Risk Register is reviewed . Cyber Treatment Plan successfully delivered and reviewed quarterly by IT, PBC and Local Digital Team . Cyber Essentials accreditation achieved in September 2024.

					. Cyber Essentials Plus assessment undertaken in November 2024. . Idox User Group in place and active [meeting frequency, etc] . Frequent communications issued relating to cyber security to raise awareness, inform of current threats, etc. . DDoS (Distributed Denial of Service) protection software implemented to reduce the risk to the Council's website due to the limitations of the current perimeter firewalls. . Digital 360 Peer Review undertaken in December 2024.

Linked Actions					
SRR-03.03 Information Asset Register (IAR) and Record of Processing Activity (ROPA) to be reviewed and updated	▶	0%	Howard Culshaw	31-Mar-2025	**Why is the action red, amber or green?** This action is green and on target based on having slipped the delivery dates for the audit recommendations due to capacity and resource issues. **What are you doing to maintain or improve the situation?** MIAA has been commissioned to deliver on the actions identified in their Audit Report and whilst initial progress has been slow progress is underway. The Auditor has issued out the existing but outdated ROPA to Heads of Service for review and comment. A progress review meeting is scheduled with MIAA for 24th January 2025. Work is also underway on an applications / systems spreadsheet which will be incorporated into the ROPA / developed as a standalone IAR.
SRR-03.04 Annual plan to be devised for BCP and IT Disaster Recovery Plan testing	⬢	70%	Howard Culshaw	31-Dec-2024	**Why is the action red, amber or green?** This action is currently Red due to the BC/DR exercise planned for November having to be rescheduled for 16th January 2025 due to key staff availability. **What are you doing to maintain or improve the situation?** The desktop exercise is going ahead on the 16th Jan with planning sessions having been undertaken beforehand and exercise documentation developed in line with NCSC guidance / documents. The scenario is testing the Council's and Liberata IT arrangements in the event of a ransomware attack targeted at the

					Elections team / process. Lessons will be learned from this exercise and then a live test will be developed to take place later in 2025. Work to be undertaken after this exercise is to also develop an annual testing plan.
SRR-03.08 Take part in the Cyber Assessment Framework pilot (CAF)	✅	100%	Howard Culshaw	31-Dec-2024	**Why is the action red, amber or green?** This action is now complete with a lot of work having been undertaken. The deadline for submitting the CAF Scoping Document (self/assessment) for Pendle was 2nd December 2024 with Pendle's being submitted on 18th November 2024. We have received confirmation that we had met the requirements for being CAF Ready on 21st November 2024 (MHCLG). **What are you doing to maintain or improve the situation?** Next steps are currently awaited from MHCLG to continue to the next stage of the process outside of the pilot.
SRR-03.09 Undertake Cyber Essentials Plus	✅	100%	Sarah Astin-Wood; Admin_Marie Mason	31-Jan-2025	Cyber Essentials Plus Certification achieved 10th December 2024.
SRR-03.10 Review feedback / next steps from MHCLG re CAF scoping / self assessment submission and progress further actions / work as required	▶	0%	Sarah Astin-Wood; Admin_Daniel McCaffrey	31-Dec-2025	
SRR-03.11 Replace the current existing perimeter firewalls	▶	0%	Sarah Astin-Wood; Admin_Marie Mason	31-Dec-2025	
SRR-03.12 Upgrade existing vulnerability management software with a more robust and improved vulnerability and patch management solution	▶	0%	Sarah Astin-Wood; Admin_Marie Mason	31-Mar-2025	
SRR-03.13 IT Programme Board exploring document labelling options / polices in O365 for protecting sensitive data without data classification and applying labels.	▶	0%	Sarah Astin-Wood; Admin_Daniel McCaffrey	30-Mar-2025	

Latest Note

New risk due to SRR-03 (Effective ICT Systems and Cyber Security and Information Governance) risk being split into two separate strategic risks:
- SRR-03a - Effective Information Governance arrangements
- SRR-03b - Effective ICT systems and Cyber Security arrangements

Four additional actions have been incorporated which will further mitigate the risks to the council with regards the Cyber Security arrangements of the Council.

The Digital 360 Peer Review report has also been received in early Jan 2025 and is currently being reviewed by CLT.

SRR-04 Delivery of the Local Plan

Risk Owner	Neil Watson - Assistant Director - Planning, Economic Development & Regulatory Services

The Council's ability to deliver an updated Local Plan. An approved local plan would allow the Council to effectively manage the boroughs land, resources, and infrastructure. Approval of the local plan is essential to ensuring continued economic development and investment throughout the borough.

Failure to deliver the local plan would have negative economic, social and heath outcomes for the residents of Pendle.

Original Risk Score	Current Risk Score	Target Risk Score
9	16	9

Impact Scores	3 - Moderate	4 - Major	3 - Moderate
Likelihood Scores	3 - Moderate	4 - Likely	3 - Moderate

Causes	Consequences	Internal Controls & Mitigations
Resource challenges. Challenging public sector landscape and central funding uncertainty Changes to national planning policy and political uncertainty.	The Local Plan is not fit for purpose (not the right plan for the area) resulting in Corporate Priorities not being achieved. The wrong Local Plan will potentially harm the economic and housing needs of the Borough.	• Monthly meeting of Local Plan Steering Group to give oversight and governance to meet targets. • Contributed to Government Planning Policy consultation and ensuing changes were reported to Committee to help steer the Plan effectively through the changes. • Data driven approach to Local Plan design. • Public consultations conducted and outcomes reported to Executive as required. • Steering Group for Local Plan meets monthly.

Linked Actions					

Latest Note
Quarter 3 2024/25 Risk Review - the Current Risk Score has remained the same. The Local Plan (LP) will now proceed to EIP (examination in public) where the planning inspector can refuse to approve the plan. Due to the recent change in government and their expected changes to planning regulations / requirements (focusing on building more houses) it is unlikely that the present plan will be approved. The new LP will need to be started as soon as the legislation is set out as required in the revised NPPF.

SRR-05 Effective Contract Performance Management - Liberata UK

Risk Owner	Sarah Astin-Wood - Head of Policy & Commissioning

The Council's ability to ensure value for money is delivered from the Council's key high value contract with Liberata UK Ltd. There is a risk that the Council's performance management framework is ineffective and doesn't provide the right information to inform effective and timely decision-making.

Poor contract management would lead to a significant loss of value of money from the Liberata contract and negatively impact the council capacity to deliver. and physical wellbeing of staff and could contribute to an increase in staff turnover.

Original Risk Score		Current Risk Score	Target Risk Score
16		**12**	**6**
Impact Scores	4 - Major	4 - Major	2 - Minor
Likelihood Scores	4 - Likely	3 - Moderate	3 - Moderate

Causes	Consequences	Internal Controls & Mitigations
Ineffective Contract documents and service agreements. Ineffective KPI's. Uncoordinated Strategic goals between organisations. Lack of Client capacity to effectively manage the Contract.	The Council is unable to deliver the required savings and efficiencies resulting in increased costs. Inability to make well informed future proof decisions.	• Annual internal audit review of Liberata Contract arrangements • Monthly Partnership Steering Group meetings undertaken which includes the review of delivery of performance indicators against targets set, any issues with service delivery, Horizon Scan. • Regular (When) contract meetings held between the Council's Director of Resources and Liberata's Local Government Regional Manager. • Quarterly Joint Partnership Board meetings are held and membership includes Members. Agenda items include updates on Liberata (as a business), performance review and challenge, along with any business as required (e.g. agreement of the performance framework, etc. • Annual Performance Framework Review is undertaken to ensure the framework remains fit for purpose.

Linked Actions					
SRR-05.05 Review of governance arrangements	▶	0%	Sarah Astin-Wood	31-Mar-2025	PBC is looking to neighbouring authorities for best practice with regards to governance arrangements.

Latest Note
Quarter 3 2024/25 Risk Review - Risk score remains the same.
No major changes impacting risk score. New KPI's and performance framework has been agreed and PBC is looking to neighbouring authorities for best practice with regards to governance arrangements.
LGA Digital Peer Review was conducted in December 2024. Report is due January 2025 and will likely include recommendations for improvements on how PBC and Lib IT interact, and present governance arrangements.
Customer Contact Strategy continuous improvement session was held January 2025 with representatives from Liberata and PBC with future sessions to follow. These sessions will look to make continuous improvements to contract arrangements and performance.

SRR-06 Delivery of key Government Programmes and Major Capital Projects

Risk Owner	Phillip Spurr - Director of Place

The Council's ability to deliver on the agreed major programmes and projects as planned, within budget and within timescales is reliant on having the right people in place in the right jobs, to focus on key programmes, including: LUF, Nelson Town Deal, UKSPF, Joint Venture (JV) Partnership Schemes, new cemetery facilities in Nelson, and a new Waste Transfer Station. The lack of clear project scopes and project plans creates delays in delivery. Any changes in key personnel can lead to delays in delivery. Potential lack of delivery capacity to move key work forward in a timely way.

Failure to deliver key government programmes and major projects would have negative economic, social and health outcomes for the residents of Pendle.

Original Risk Score	Current Risk Score	Target Risk Score
16	12	9

Impact Scores	4 - Major	4 - Major	3 - Moderate
Likelihood Scores	4 - Likely	3 - Moderate	3 - Moderate

Causes	Consequences	Internal Controls & Mitigations
Loss of critical staff affecting the ability to deliver key projects. Lack of sufficient capacity and specialist capabilities to progress activities.	Reputational damage with communities, public and partnerships. Loss of grant funding and investment. Failure to deliver key transformational activities.	. Monthly / Quarterly Returns - Both financial and delivery returns submitted as per funding conditions. . Nelson Town Deal Board meetings undertaken frequently bi-monthly) . PenBrook Joint Venture established and meet quarterly to deliver key Nelson Town Deal projects . Internal programme governance under review . Consultants procured to assist with the delivery of cemetery facilities project and internal working group established meeting monthly . Agreement reached to secure Raise Partnership regeneration support for NTD and LUF.

Linked Actions					
SRR-06.05 Recruit a Principal Economic Development Officer	✅	100%	Iftikhar Bokhari	31-Dec-2024	Action completed. Officer recruited and in post.
SRR-06.06 External Review of regeneration management modles	▶	0%	Phillip Spurr	31-Mar-2025	

Latest Note
Quarter 3 2024/25 Review - No change to risk score this quarter.

Existing programmes and projects will carry on. In the November 2024 budget confirmation was received of continuation of the Long Term Town plan programme. Officers continue to work to ensure timely delivery of the Town Deal and Levelling Up programmes. A report on the way forward for the UKSPF programme will be presented to Executive in January 2025. |

SRR-07 Political Balance / Stability

Risk Owner	Howard Culshaw - Head of Legal & Democratic Services

The Council's ability to deliver effective decision making by Members.

Failure to achieve strong political balance and buy-in will affect the decision-making processes, hindering delivery of key projects / corporate priorities.
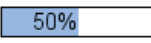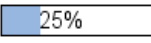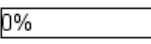
Pendle has a balanced political base which has seen the control of Council change over recent years.

Original Risk Score	Current Risk Score	Target Risk Score
16	**12**	**9**

Impact Scores	4 - Major	4 - Major	3 - Moderate
Likelihood Scores	4 - Likely	3 - Moderate	3 - Moderate

Causes	Consequences	Internal Controls & Mitigations
Inability to achieve a strong political balance and buy in. Insufficient training and support to enhance the decision-making process. Insufficient attendance at training and support sessions.	Hindering delivery of key projects (such as, UKSPF, LUF, Town Deal)/ corporate priorities. (e.g. responding to the recommendations of the Leisure Review) Poor decision making could lead to the issuing of a S114 notice with consequences such as the subsequent closure of all leisure centres.	• **Declaration of Interest forms** completed and published for all Members • **Constitution** guiding member actions and behaviour • Constitution review undertaken annually. • Inductions for all new members • Member Newsletter issued monthly to keep Members informed of current activity • Delivery of a relevant, responsive and effective Member training programme. • **Member Code of Conduct** in place and reviewed annually. • **Governance & Committee** Structure in place. • Regular meetings with Portfolio Holders and CMT.

Linked Actions				
CP24 1.04 Governance	▶	37%	Karen Spencer; Phillip Spurr	31-Mar-2025	**Why is the action red, amber or green?** This priority is still green and on target however delays are expected. **What are you doing to maintain or improve the situation?** The consultant who has been appointed has failed to meet the

				projected September 2024 deadline. We are hopeful that the new December 2024 deadlines will be met.
CP24 1.04a Consider the actions from the Value for Money review by external audit	▶	50%	Gemma-Louise Wells	31-Mar-2025	**Why is the action red, amber or green?** This milestone is green and on target for delivery. **What are you doing to maintain or improve the situation?** Draft report on Joint Ventures have been received, next steps (recommendations) are now being planned. We are now agreeing terms of reference for the Planning Report.
CP24 1.04b Review of constitution	▶	25%	Howard Culshaw	31-Mar-2025	**Why is the action red, amber or green?** This priority is still green and on target. **What are you doing to maintain or improve the situation?** The consultant who has been appointed is now progressing the report that will feed in to the review. The outcome of this review is due to be reported to Council by the end of the financial year.
SRR-07.06 Await / implement the results from the Value for Money Audit in relation to Members	⬣	0%	Howard Culshaw	31-Dec-2024	

Latest Note
Report relating to Planning and Joint Ventures that was due in September 2024 has been delayed and will be delivered in October 2024. Once received we will review / implement the actions. PBC has engaged with the LGA to provide "top team" support. This is due to commence in October 2024.

SRR-08 Ability to deal with extreme weather and civil contingencies (such as a pandemic)

Risk Owner	David Walker - Assistant Director - Operational Services

Sufficiently robust BCP and EP arrangements not in place placing the Council at high level of risk. It is likely that extreme weather impacts on delivery of day-to-day services and on our vulnerable residents will become more prevalent in coming years. As a District Council, PBC has access to fewer resources than larger Authorities.

Failure to prepare for extreme weather and civil contingencies would / could have catastrophic outcomes for the residents of Pendle and expose the Council to significant reputational and financial risks.

Original Risk Score	Current Risk Score	Target Risk Score
16	12	9

Impact Scores	4 - Major	4 - Major	3 - Moderate
Likelihood Scores	4 - Likely	3 - Moderate	3 - Moderate

Causes	Consequences	Internal Controls & Mitigations
In the coming years and decades it is predicted that temperatures will rise, winter rainfall will increase whilst summer rainfall decreases and heat waves, droughts, storms and floods will become more frequent and more severe this will have a major impact on the people and landscapes, businesses of Lancashire. Climate change may lead to more outdoor air pollutants including particulate matter and ground level ozone. These pollutants can affect some vulnerable people resulting in higher demands for support being received. There remains a persistent risk of Pandemics and infectious diseases.	Impact on infrastructure (roads/ highways/ vulnerable people/ front door services). The Council will be faced with the challenges of providing essential and critical services during periods where we could be impacted by additional request for support or reduced staffing levels. Requests for assistance or support may be isolated such as flooding or alternatively our resources may be required to support a multi agency response as we found during the coronavirus pandemic	• Business Continuity & Emergency Plan in place • Disaster Recovery Plan in place • Resilience Direct Workshops • Weekly Out Of Hours (OOH) lists maintained (PBC & PLT) • PLT Keyholder list maintained • Liberata contact list maintained • BCP, DR & EP policies reviewed annually. • DR test scheduled for January 2024. • Attendance at LRF Winter Energy Risk Briefings and both strategic and tactical co-ordinating group meetings when required. • Local Civil Emergency Plan updated as required, e.g. when organisational changes are made. • PBC signed up to Countywide mutual aid agreement which confirms a commitment from each organisation to provide support if able to do so during times of emergencies. *(DM CHECK - Refresh completed and shared yet?)*

Linked Actions				
SRR-08.02 Consider formalising and strengthening the stand-by officer arrangements for EP – currently relies on goodwill and	▶	75%	David Walker	31-Mar-2025	Created an Emergency Plan WhatsApp Group for CMT and Emergency Planning Team members.

has limited volunteers so is a weakness in our arrangements currently.					WhatsApp notifications issued to the group through November and December provided faster connection with senior leads and key staff members. Discussion on out of hour call out arrangements to be held at CMT 14th January 2025.

Latest Note
Quarter 3 2024/25 Review - Risk Score remains unchanged. Created an Emergency Plan WhatsApp Group for CMT and Emergency Planning Team members. WhatsApp notifications issued to the group through November and December provided faster connection with senior leads and key staff members. Discussion on out of hour call out arrangements to be held at CMT 14th January 2025.

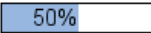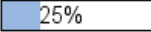## SRR-09 Achievement of carbon neutral targets by 2030

Risk Owner	Phillip Spurr - Director of Place

The Council's inability to meet national Carbon Neutral targets and PBC corporate carbon reduction targets. Additional Factors:
- Continuation of Services (E Fleet, Blackouts…)
- Estate Energy procurement
- Capital Procurement of Renewables
- Insulation of Council Property and wider Private Housing Estate
- Leisure estate emissions

This is a very ambitious target which doesn't currently permeate through all Council decisions.
Failure to meet the Councils Carbon Targets could have significant legal, reputational and financial implications.

Original Risk Score	Current Risk Score	Target Risk Score
20	20	16

Impact Scores	4 - Major	4 - Major	4 - Major
Likelihood Scores	5 - Almost Certain	5 - Almost Certain	4 - Likely

Causes	Consequences	Internal Controls & Mitigations
Lack of experience and skills to drive transformation. Funding and budget for transformation is not identified / available. Capacity and resource – the Council does not have a dedicated Climate Change Officer but is looking to imbed as part of the culture of the organisation.	Financial penalty for not achieving targets Reputational Damage Long term impacts of climate change on local communities External scoring by Climate UK	. Climate Emergency working group meetings . Quarterly monitoring of relevant PI's to ensure continuous improvement . Agile working and flexible working reduces carbon emissions . New energy contract secured for energy services (When) . Use of HVO (Hydro-treated Vegetable Oil) in part of the PBC vehicle fleet . Internal annual carbon reduction targets in place. . Annual Carbon Emissions Report produced . Energy review of leisure sites has been commissioned and will be undertaken by APSE December 2024 . Up to date strategy and action plan in place and is being delivered

Linked Actions				
CP24 4.01d Plan/implement energy saving schemes	▶	75%	31-Mar-2025	**Why is the action red, amber or green?** This actions is green and on target, with good progress being made.

				What are you doing to maintain or improve the situation? Bid for the Public Sector Decarbonisation Fund has now been submitted and decision is expected in May 2025. Following a successful bid planned energy saving schemes will be implemented. Swimming pool support fund works are being progressed.
SRR-09.04 Climate Emergency Action Plan agreed	▶	50%	Phillip Spurr	31-Mar-2025	**Why is the action red, amber or green?** This action is green and still on target. It has been delayed due to a lack of resourcing but this post is now due to be filled. **What are you doing to maintain or improve the situation?** Climate Officer is due to come in to post on the 28th October 2024. Following their appointment they will drive the delivery of the Councils Climate Action Plan. The Council is seeking consultants to deliver the Climate strategy & action plan they are expected to be appointed in November 2024.
SRR-09.05 Review of Council Fleet to take place to ascertain the viability of procuring Electric Vehicles and charging stations.	✓	100%	Phillip Spurr	31-Mar-2025	Fleet decarbonisation review was completed in June 2024. There seems little chance of the Council moving the fleet to electric due to limitations in the market place and infrastructure. Some opportunities did exist though, the mayor's car could be replaced with an electric car and some light commercial vans could be swapped out as well. The heavier fleet will continue to use HVO and we will need to ensure replacement units can run off HVO in the future.
SRR-09.06 Energy Efficiency of the Council's buildings assessed and programme of works agreed (Heat De-carbonisation Plans) to achieve carbon neutral targets where possible	▶	25%	Phillip Spurr	31-Mar-2025	**Why is the action red, amber or green?** This action is green and good progress has been made. **What are you doing to maintain or improve the situation?** Bid to the Public Sector decarbonisation fund is due to be submitted by the end of November. If successful this will provide additional resources to reduce carbon emissions from the leisure centres (PLT).

Latest Note
Quarter 3 2024/25 Review - Risk score remains the same but Impact (5) and Likelihood (4) now changed to Impact (Major) now being 4 and Likelihood (Almost Certain) now being 5.

The risk remains high however a good amount of progress has been made in managing this risk.

A new Climate Officer now in post and will drive the delivery of the Councils Carbon neutral targets.

Consultants appointed and are now developing a new Climate Emergency Action Plan.

A bid for decarbonisation funding has been submitted (due May 2025) and if successful will provide funding that will directly impact the councils ability to reduce this risk.

SRR-10 Safeguarding of residents

Risk Owner	Sarah Astin-Wood - Head of Policy & Commissioning

The Council needs to ensure that all employees are aware of the organisation's responsibilities in relation to safeguarding children and vulnerable adults.
Life in Pendle survey highlighted residents' perception of concerns around safeguarding incidents witnessed in their communities.
Safeguarding cases highlighted in the media following police investigations.

Failure of the Council to effectively carry out its safeguarding duties could have significant reputational impacts.

Original Risk Score	Current Risk Score	Target Risk Score
9	9	4

Impact Scores	3 - Moderate	3 - Moderate	2 - Minor
Likelihood Scores	3 - Moderate	3 - Moderate	2 - Unlikely

Causes	Consequences	Internal Controls & Mitigations
Lack of Training & Awareness Lack of resource and capacity increasing errors. Increasing inequalities in communities Increasing pressure on front door services	Safeguarding breach. Moral and ethical considerations. Reputational damage.	• Safeguarding policy review (Next scheduled June 2025) • Statutory training for Taxi drivers for new drivers and a 3yr refresher delivered via an online package. • Partnership work with LCC, NHS & Police • All Staff undertook Safeguarding Training (basic awareness) in September 2022. • Refresher training will be developed and delivered following Safeguarding Policy reviews. • Identified front-line staff undertook Safeguarding Level 2 Training in November 2022 (face-to-face). • Pendle Genga Panel brings partners together to identify and collectively disrupt serious organised crime (including child exploitation) using a variety of powers. A number of Council services are represented.

Linked Actions				
SRR-10.04 Revise Safeguarding Policy & Practice (Children & Adults)	▶	0%	Gill Dickson	31-Jul-2025
SRR-10.05 Deliver Safeguarding and Prevent Training to all Staff	▶	0%	Gill Dickson	30-Nov-2025

Latest Note
Quarter 3 2024/25 Review - no changes to risk score required. Safeguarding Policy and practice are due for review this year (approximately June 2025). Staff training will follow the review ensuring that all PBC staff are current and competent with regards to their safeguarding duties. A follow up on the, online, national Prevent training delivered to all staff is also scheduled for 2025 as well as face to face training for all frontline Operational Services staff.

SRR-11 Public Health and Wellbeing

Risk Owner	Phillip Spurr - Director of Place

Poor public health outcomes for the people of Pendle Borough Council
.   poor health, etc
.   High number of terraced housing in certain parts of the borough
.   High levels of Deprivation
.   DFG programme – backlog and underspending
Failure to manage public health and wellbeing could reduce the health, social and economic outcomes for residents. Additionally, this could lead to additional strain on Council services.

Original Risk Score	Current Risk Score	Target Risk Score
16	**12**	**9**

Impact Scores	4 - Major	4 - Major	3 - Moderate
Likelihood Scores	4 - Likely	3 - Moderate	3 - Moderate

Causes	Consequences	Internal Controls & Mitigations
Cramped housing can be the cause of health issues. Low levels of street cleanliness. Wage levels lower than the national average. High unemployment levels in the economically active age group.	Higher levels of infant mortality. Pendle is the 36th most deprived area out of 317 district and unitary authorities in England and 5th most deprived district in Lancashire (IND 2019).	. Holiday Activities and Food programme delivered throughout the year . Regeneration Steering Group managing PBC regeneration projects . Nelson Town Deal Board managing grants to local businesses, improving resilience and helping with growth . Comprehensive Homelessness Support framework in place . Integrated Care Board . UKSPF, LUF, Nelson Town Deal, £20m Long Term Towns Fund for Nelson have health dimension. . Health and Wellbeing plan agreed and in place . Increased pride in place identified in latest pendle survey . Cost of living interventions in place . Mechanical street cleaning is delivered on a weekly schedule within the areas linking to this risk. In support of this service, additional resources are deployed within areas of greater need to remove littering and fly-tipping . Enforcement staff patrol all areas dealing with offenders as and when evidence is found. Pendle Community Safety Partnership bring stakeholders together to help reduce crime and anti-social

					behaviour

Linked Actions					
CP24 4.04 Health and Wellbeing	▶	93%	Sarah Astin-Wood; Gill Dickson	31-Mar-2025	**Why is the action red, amber or green?** This corporate priority is green with 3/5 milestones now being completed and substantial progress made on the remainder. **What are you doing to maintain or improve the situation?** Support for Pendle's vulnerable families continues to be delivered with the success of the winter HAF programme and the roll out of HSF 6. Work is also ongoing to identify potential locations for breast screening services in West Craven.
SRR-11.05 Investment Plan for Long Term Towns Fund for Nelson developed	⬤	99%	Phillip Spurr	31-Aug-2024	Awaiting revised guidance.

Latest Note
Risk remains unchanged this quarter. Key Progress made: - The backlog of DFG cases has been significantly reduced. - Just under 2000 children and young people supported through the Holiday Activities and Food Programme - Significant progress made on Corporate Priority 4.04 Health & Wellbeing - PLT working to develop new Public Health Programmes

SRR-12 Local Workforce Skills development

Risk Owner	Iftikhar Bokhari - Head of Economic Growth

Skills shortage, poor educational attainment, poor housing, etc can all have negative impacts on the local economy.

Original Risk Score	Current Risk Score	Target Risk Score
16	**6**	**9**

Impact Scores	4 - Major	3 - Moderate	3 - Moderate
Likelihood Scores	4 - Likely	2 - Unlikely	3 - Moderate

Causes	Consequences	Internal Controls & Mitigations
Deprivation in the local area (unemployment). Pendle has one of the lowest average Attainment 8 scores in Lancashire. Lack of local employment and regeneration and economic growth in the area. Almost 3 in 10 jobs in Pendle are in the manufacturing sector, which is significantly higher than the national figure of 8%. There are fewer professional jobs in Pendle (4%) when compared with the national average (9%). Wage levels are lower than the national average.	Pendle is the 36th most deprived area out of 317 district and unitary authorities in England and 5th most deprived district in Lancashire (IND 2019) Skill shortage. Loss of local economic growth. Skills migration out of Pendle.	. Pendle Vision Board - Representing and coordinating local business. . Pendle Connects - Upskilling and providing value to the local community. . East Lancs Chamber of Commerce- Delivering advice to businesses & upskilling locals. . Kickstart programme undertaken which provided real life work placements for long term unemployed people. . Youth Employment Support (YES) Hub in operation in Nelson run by Active Lancashire delivering value to communities - Review March 2026. . Economic Recovery and Growth Strategy 2021-26 contains immediate and aspirational targets which are being pursued.

Linked Actions					
SRR-12.01 Work with NCC to create an "IT Hub" accessible to the local community	⬣	90%	Iftikhar Bokhari	31-Jul-2024	**Why is the action red, amber or green?** This action is now red and overdue, however work has commenced. **What are you doing to maintain or improve the situation?** Contracts have been exchanged for the IT hub and work is now commenced on site to update the HVAC system.

Latest Note

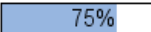Quarter 3 2024/25 Review - No change to risk score this quarter.

The work to deliver the "IT Hub" is in the final stages and work is ongoing with NCC and other stakeholders to get it off the ground.
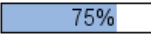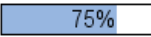
Contracts have been exchanged for the IT hub and work is now commenced on site to update the HVAC system.

SRR-13 Leisure Review

Risk Owner	Phillip Spurr - Director of Place

Ensuring that the Leisure Centres can remain economically viable and continue to offer their services to the residents of Pendle. Making sure that the Leisure Centres infrastructure and estates remain fit for purpose and that they can remain competitive despite challenging market conditions.
Failure to effectively manage this risk will lead to worse health, social and economic outcomes for the residents of Pendle and could lead to the closure of one or more Leisure Centres.

Original Risk Score	Current Risk Score	Target Risk Score
9	**12**	**6**

Impact Scores	3 - Moderate	4 - Major	3 - Moderate
Likelihood Scores	3 - Moderate	3 - Moderate	2 - Unlikely

Causes	Consequences	Internal Controls & Mitigations
• Ageing estates that require a significant investment to modernise or maintain. • Competitive market with significant local competition (gyms, clubs, etc.) • Increasing costs (such as minimum wage, employers NI contributions, power, heating, etc) • Less disposable income in the local area (cost of living crisis)	• Leisure centres unable to operate cost effectively. • Closures of Leisure Centres if nothing changes. • Increased reliance on Council financial support - placing additional pressure of the MTFP. • Reduced health outcomes for residents.	. Audit of PLT Client arrangements . Quarterly Leisure Client Meetings . The Council's Executive met with the PLT Board in December 2024 to set expectations for 2025/26 Directors of Place & Resources working closely with new CEO of PLT on driving efficiencies.

Linked Actions					
CP24 4.01 Indoor Leisure Review	▶	75%	Phillip Spurr	31-Mar-2025	**Why is the action red, amber or green?** This action is green with progress being made. **What are you doing to maintain or improve the situation?** A report was received and presented to Executive in September 2024. This included a number of actions and the Executive will now meet with PLT board in mid-November to discuss the way forward for PLT.
CP24 4.01b Determine how existing leisure centres can become financially and environmentally sustainable	⬣	75%		31-Dec-2024	Public Sector Decarbonisation fund bid has been submitted with a decision expected in May 2025. There has been a meeting between PLT board and PBC Executive. PLT CE is now undertaking a strategic review of all

					issues and will be providing details of all cost saving proposals shortly.
CP24 4.01c Complete phase one of the refurbishment programme currently underway	▶	75%		31-Mar-2025	**Why is the action red, amber or green?** Progress continues to be made on all refurbishment and building works. **What are you doing to maintain or improve the situation?** Wavelengths extension planning application has now been submitted. Now working on contractor procurement and we are expected to start on site in Q3 2025.
CP24 4.01d Plan/implement energy saving schemes	▶	75%		31-Mar-2025	**Why is the action red, amber or green?** This action is green and on target, with good progress being made. **What are you doing to maintain or improve the situation?** Bid for the Public Sector Decarbonisation Fund has now been submitted and decision is expected in May 2025. Following a successful bid planned energy saving schemes will be implemented. Swimming pool support fund works are being progressed.

Latest Note
PLT undertaking a strategic review of activities. Details awaited.
Increases in employers National Insurance contributions and minimum wage has placed additional financial pressure on PLT. This has resulted in a request for additional support.

SRR-14 Joint Venture Companies

Risk Owner	Phillip Spurr - Director of Place

Ensuring that the Council and its Members are aware of all joint ventures and the implications and responsibilities regarding decision making. Joint ventures include; PEARL (Barnfield), PEARL 2 (Together Housing), PEARL Brierfield Mill (Northlight), PenBrook (Joint Venture with Brookhouse Mill).

Failure to do so would result in inconsistent decision making that works against the interests of the Council.

Original Risk Score	Current Risk Score	Target Risk Score
20	**16**	**9**

Impact Scores	5 - Catastrophic	4 - Major	3 - Moderate
Likelihood Scores	4 - Likely	4 - Likely	3 - Moderate

Causes	Consequences	Internal Controls & Mitigations
There must be comprehensive governance arrangements in place to ensure the Council maintains a level of overview in the companies sufficient to safeguard its investment of public money or other assets invested in them. Whilst they are appointed by the Council, a Pendle Director is not a representative of the the Council when they are acting in their capacity as a Director of a company, and when acting as such they must always comply with their duties as a company director, which are required to take precedence over the Pendle Directors' duties to the Council.	Conflicts of interest may arise if the Director is an Elected Member as they are under an overriding, non-delegable and unavoidable public law duty to always act in the best interests of the Council. Potential reputational damage to the Council or individual Elected Member. Potential disruption to Council activities and plans.	• A legal review is underway to advise on the most effective governance arrangements for the JV's • Shareholder agreements will need putting in place for all JV's • There is potential to introduce shareholder committees to safeguard the Council's interest. • Introduction of a requirement to produce an annual business plan for each of the JV companies, in order to monitor performance.

Linked Actions				
SRR-14.01 Commission external legal advisor to review the governance arrangements	✅	100% Karen Spencer	30-Sep-2024	This action is now completed a draft report has been received and is being reviewed. next steps are currently being planned. It is expected that this will generate a number of actions.

Latest Note
Draft Joint Ventures governance report has now been received. Report is being reviewed and next steps are currently being planned. It is expected that this will generate a number of actions.