

Report to **Policy & Resources Committee**
Date **20 February 2025**
By **Head of Governance and Monitoring Officer**
Title of Report **Corporate Risk Register**

Note

Recommendation: The Committee is recommended to:

1. Receive and consider the Corporate Risk Register as at February 2025.

1. Introduction

- 1.1 The Policy and Resources Committee has terms of reference which include "... to ensure the robustness of risk management and performance management arrangements."
- 1.2 The Corporate Risk Register is reported to each meeting of the Committee and members have the opportunity to discuss the register with officers in advance of the committee as part of the ongoing risk management process. The register is regularly monitored by the organisation's Operational Management Team and issues escalated to Senior Leadership Team (SLT) as required.

2. Policy Context

- 2.1 Corporate Governance comprises the arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved. It includes the systems and processes, and cultures and values, by which public bodies are directed and controlled and through which they account to and engage with their partners, communities and citizens.
- 2.2 Risk management is a key aspect of corporate governance and is one of the 7 principles in the 'Delivering Good Governance in Local Government Framework (2016) developed by CIPFA and SOLACE (Chartered Institute of Public Finance & Accountancy and Society of Local Authority Chief Executives & Senior Managers) to help public bodies make open, transparent and better-informed decisions that take full account of risk and opportunities.

3. Issues for consideration

- 3.1 **Appendices 2 and 3** show the risk register in a graphical way which allows Members to see, at a glance, the likelihood and impact of risks. Explanatory information, which was updated at the last meeting of the P&R Committee as part of the revised Risk Management Policy and Guidance, is provided at **Appendix 1** to this report.
- 3.2 Updates to mitigations and actions, where identified, across all risks are documented in **Appendices 2 and 3** to this report. **Appendix 3** is not for publication as it contains exempt information within paragraph 3 of Part 1 of Schedule 12A to the Local Government Act 1972.

3.3 The only significant change to the Corporate Risk Register since the previous meeting of the Committee on 21 November 2024 is the addition of risk 8.1: Devolution in England and Local Government Reorganisation. The Government issued the English Devolution White Paper on 16 December 2024 and local authorities were invited to express their interest in being part of the devolution priority programme by 10 January 2025. Hampshire and the Solent, and Sussex and Brighton submitted expressions of interest and were accepted onto the priority programme. This means that devolution and local government reorganisation, whilst separate processes in themselves, will move at pace impacting all local authorities across the South Downs National Park. Devolution will be seen at mayoral elections for strategic authorities take place in May 2026. Interim proposals for local government reorganisation are to be submitted by councils to Government no later than 21 March 2025, with full proposals to be submitted by 26 September 2025. Shadow unitary authorities are expected to be set up by 2027, with those unitary authorities going live in 2028. There are a variety of risks and opportunities associated with devolution and local government reorganisation and these are likely to develop and our understanding of them be clarified as interim and full proposals are submitted by local authorities to Government.

3.4 Members attention is also drawn to the following other notable updates:

- Risk 2.1, Finance and Budgets: Exploration of revenue vs capital allocation through the 23/24 accounts to identify where greater use of revenue expenditure allowed to be funded by capital under statute (REFCUS) may be used in future and the potential capacity of the Authority to accept a greater level of capital funding.
- Risk 2.2, Income Generation: Government have committed to introducing a general power of competence for National Park Authorities to clarify the legislative framework we operate within which will open further opportunities for income generation.

4. Options & cost implications

4.1 Members are asked to receive and consider the Corporate Risk Register.

4.2 Management of risk is a key aspect of the organisation’s governance and is undertaken within existing corporate budgets.

5. Next steps

5.1 Further updates on the Corporate Risk Register will be brought to future meetings of the Committee.

6. Other implications

Implication	Yes/No
Will further decisions be required by another committee/full authority?	No
Does the proposal raise any Resource implications?	There are no additional resource requirements arising directly from this report. Any additional resources required for the delivery of identified mitigations will be subject to the Authority’s usual decision-making requirements.
How does the proposal represent Value for Money?	Effective risk management contributes to the efficient running of the organisation.
Which PMP Outcomes/ Corporate plan objectives does this deliver against	Risk management at the SDNPA underpins the effective delivery of PMP Outcomes and Corporate Plan Priorities.

Implication	Yes/No
Links to other projects or partner organisations	As the SDNPA works in partnership with many other organisations, some risks will inevitably impact on project and/or partnership working.
How does this decision contribute to the Authority's climate change objectives?	Risks to SDNPA's objectives and action plan would be monitored through risk management procedures and, if required, would be escalated to the Corporate Risk Register.
Are there any Social Value implications arising from the proposal?	No
Has due regard been taken of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	There are no equalities implications arising from this report. Actions and mitigations are subject to an Equalities Impact Assessment where this is appropriate.
Are there any Human Rights implications arising from the proposal?	There are no implications arising from this report.
Are there any Crime & Disorder implications arising from the proposal?	There are no implications arising from this report.
Are there any Health & Safety implications arising from the proposal?	Whilst risks on the register may have H&S implications and mitigations in place for the Authority, there are no implications arising directly from this report.
Are there any Data Protection implications?	There are none

7. Risks Associated with the Proposed Decision

7.1 There are no direct risks arising from this report. The report outlines the current major risks facing the Authority and how they will be mitigated.

RICHARD SANDIFORD

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South Downs National Park Authority

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Appendices

1. Explanatory Information
2. Corporate Risk Register September 2024
3. Corporate Risk Register September 2024 – exempt items

SDNPA Consultees	Chief Executive Officer, Director of Planning, Chief Finance Officer; Solicitor.
External Consultees	None
Background Documents	None

Explanatory Information for Risk Register

Likelihood Descriptor	Risk Scoring Guidance
Almost Certain (5)	The event is expected to occur in most circumstances.
Likely (4)	There is a strong possibility the event will occur.
Possible (3)	The event might occur at some time
Unlikely (2)	Not expected, but a slight possibility
Rare (1)	Highly unlikely. It could happen but probably never will

Severity Descriptor	Risk Scoring Guidance
Insignificant (1)	<p>Insignificant disruption to community services, including transport services and infrastructure.</p> <p>No disruption to service delivery, unlikely to cause complaint or instigate litigation.</p> <p>None or minimal financial burden (less than £5k) which can be resolved at local / department level, minor interruption to income generation, no permanent loss.</p> <p>Insignificant impact on environment.</p> <p>Organisation's reputation remains intact.</p>
Minor (2)	<p>Minor localised disruption to community services or infrastructure for less than 24 hours.</p> <p>Minor disruption to service delivery, complaint possible, litigation unlikely.</p> <p>Minimal financial burden or disruption to income generation (between £5k - £50k). Can be resolved at line manager / service manager level through usual budgetary measures.</p> <p>Minor impact on environment with no lasting effects.</p> <p>Minimal impact on organisation's reputation.</p>
Moderate (3)	<p>Localised disruption to infrastructure and community services, damage confined to a specific location or to a number of locations, but requires additional resources.</p> <p>Moderate disruption to service delivery, high potential for complaints, litigation possible, but not certain.</p> <p>Moderate financial burden (between £50k - £250k). Interruption to income generation lasting less than 14 days, majority of income recoverable but at additional cost.</p> <p>Limited impact on environment with short-term or long-term effects.</p> <p>Moderate impact on organisation's reputation.</p>

Severity Descriptor	Risk Scoring Guidance
Major (4)	<p>Requires support for local responders with external resources, significant damage that impacts on and means possible breakdown of some local community services.</p> <p>Significant disruption to service delivery service closure for 1-7 days, complaints expected, litigation expected.</p> <p>Major financial burden (between £250k - £500k). Can include significant extra clean up and recovery costs.</p> <p>Significant impact on environment with medium to long term effects.</p> <p>Major impact on organisation’s reputation / national adverse publicity.</p>
Catastrophic (5)	<p>Extensive damage to properties and built environment in affected areas. General & widespread displacement of people for prolonged duration. Community unable to function without significant support.</p> <p>Very significant disruption to service delivery service closure for more than 7 days or closure of multiple services, complaints certain, litigation certain.</p> <p>Very significant financial burden (greater than £500k). Extensive clean up and recovery costs.</p> <p>Serious long-term impact on environment and / or permanent change.</p> <p>Catastrophic impact on organisation’s reputation. International adverse publicity.</p>

SDNPA Risk Appetite Statement

The Authority seeks to operate within a relatively wide overall risk range.

One of the Authority’s key cultural values is that of innovation and the Authority seeks and encourages innovative approaches in the delivery of its purposes and duty wherever possible and appropriate. This includes being open to options and activities which may include some risk but are likely to result in better value for money in the delivery of its services. This is underpinned by a strong governance framework which ensures proper consideration of legal risks and delivery of effective decision making, oversight, and performance management.

Some of the Authority’s operations require a cautious approach to ensure a reliable service that engenders public trust and does not unduly risk the Authority’s reputation, for example, in the day-to-day delivery of its statutory planning service. However, the Authority remains open to innovative solutions and approaches which lead to significant benefits for the Authority and the public in the delivery of these services.

The Authority strives to ensure the best use of public funds and, therefore, takes a cautious approach in the general management of its finances whilst remaining alert to opportunities for efficiency savings, better value for money in service delivery, and opportunities for income generation.

The areas of lowest risk appetite for the Authority are in fulfilling its responsibilities to the personal safety and security of people. It is acknowledged that in some areas of delivery, such as at Seven Sisters Country Park, there are risks that are balanced with the delivery of activities and services to the public alongside the conservation and enhancement of nature and the landscape. Nevertheless, at all times the Authority will ensure a tight risk profile in relation to health and safety risks.

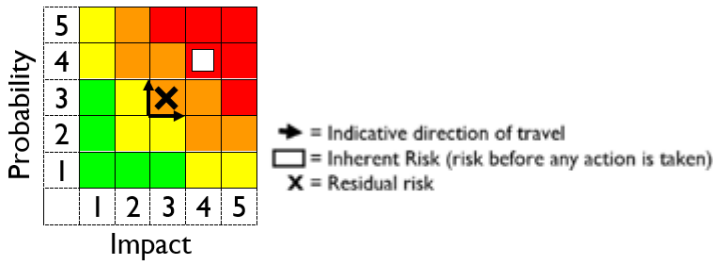
**South Downs National Park Authority
Corporate Risk Register**



Risk I.1: Staffing

Owner: Siôn McGeever

The grid below highlights that the inherent risk is likely with a Major impact and after mitigations, it is scored as Possible with a Moderate impact. Perceived direction of travel is increasing.



Description of impact of risk:

Inability to attract/retain key staff impacts upon the organisation’s service delivery. High staff turnover results in inefficiency across the organisation. Lack of diversity within the organisation impacts ability to deliver on priorities and on reputation. Mental Health issues affect staff performance and delivery.

Mitigations:

1. Pay structure and terms and conditions in place, with new pay award post April 2024.
2. Training and development programme,
3. Staff survey and action plan,
4. PDR policy,
5. Internal policies and procedures in place e.g. (Family friendly, flexible working).
6. Webinars available for all staff related to mental health and homeworking, regular communications through internal communications channels.
7. Mental health first aiders in place, independent counselling and support resources available through Simply Health. Regular communication of wellbeing resources to staff and access for staff and Members to wellbeing portal.
8. Blended working policies agreed and monitored through OMT.
9. Action plan for improving diversity through recruitment.

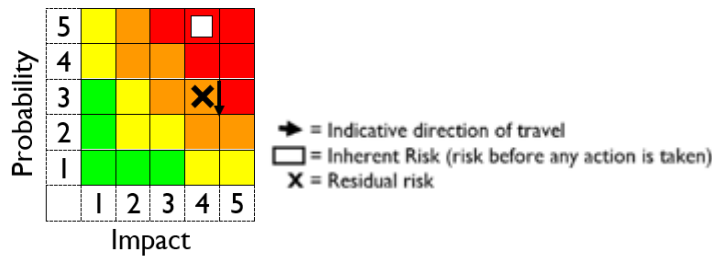
Updates:

Challenges in diversifying through recruitment with potential impacts on delivery, attracting funding and reputation from limited diversity. Clear actions in place to address as summarised in report to February Policy and Resources Committee.

Risk 2.1: Finance and Budgets

Owner: Siôn McGeever

The grid below highlights that the inherent risk is Almost Certain with a Major impact and after mitigations it is scored as Possible with a Major impact. Perceived direction of travel is reducing.



Description of impact of risk:

Budgets insufficient due to a failure of the Defra grant to increase in real terms over a number of years, a reduction of the Defra grant, or an in-year requirement for savings; failure to match resources and workloads across the organisation; or negative impacts of increased inflation rates or increased employer pension or national insurance contributions on costs. Partnership Management Plan Review or Local Plan Review suffers and SDNPA lacks capacity to properly remunerate staff and/or support other work. Resources not available to deliver on all priorities.

Mitigations:

1. Sufficient headroom within revenue budget and sufficient financial risk reserves to enable any shortfall to be managed in the short term whilst the medium-term budget is adjusted.
2. Ongoing Income Generation activity to provide additional income which supports the activities of the Authority.
3. Appropriate capitalisation of expenditure to ensure optimum use of revenue and capital resources.
4. Thorough budget planning and profiling process undertaken with budget holders to support tighter financial information for the budget setting process with Members.
5. Effective and early scenario planning through Member workshops to redefine the medium-term financial planning process and approach to Budget setting, including strengthened alignment to the Corporate Plan.
6. Improved monthly revenue and capital budget monitoring undertaken by budget holders and OMT enabling identification of areas of potential underspend, overspend, compensating savings with subsequent action plan.
7. Industry and Office of Budget Responsibility (OBR) indices used to model real world inflation implications through the medium-term financial plan.
8. Procurement processes identify issues related to inflation and, where appropriate, changes to specifications etc. are made to manage impacts of inflation.
9. Opportunities for funding and/or private investment into the National Park continued to be explored which could result in potential cost recovery or mitigation for the Authority e.g. S106 and Nature Based Solutions Service.
10. Fixed costs, including staffing costs, are kept under review following transition to a new business model completed in 2023/24 with significant savings being realised and continually re-assessed.

Updates:

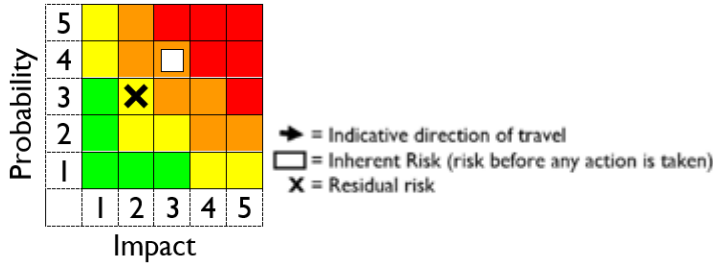
Revised budget planning and profiling process with budget holders supports tighter financial information for budget setting process with Members.

Exploration of revenue vs capital allocation through the 23/24 accounts to identify where greater use of revenue expenditure allowed to be funded by capital under statute (REFCUS) may be used in future and the potential capacity of the Authority to accept a greater level of capital funding.

Risk 2.2: Income Generation

Owner: Siôn McGeever

The grid below highlights that the inherent risk is likely with a Moderate impact and after mitigations it is scored as Possible with a Minor impact. Perceived direction of travel is No Change



Description of impact of risk:

Insufficient income generation opportunities are identified to support NPA budgets and delivery of priorities. Inability to meet expectations of Government in relation to income generation. Insufficient skills /experience “in house” to exploit potential income generating opportunities.

Mitigations:

1. Governance framework for consideration of SDNPA powers in relation to income generation activity in place.
2. Sufficient reserves held to enable recruitment of staff with necessary skill set if required.
3. Skilled income generation team operating well and meeting its targets.
4. Ongoing support for South Downs National Park Trust.
5. Nature Based Solutions Service promotes nature recovery on sites in the SDNP and provides the Authority with opportunities for cost recovery in the delivery of the service.
6. Reviewing future workstreams with a view to greater targeting of long-term external grants and other income streams.
7. Income generated through delivery of the Planning Services, including through Community Infrastructure Levy (CIL) and Section 106 agreements.
8. Opportunities for income generation at Seven Sisters Country Park being delivered for the benefit of the Country Park. Possible future opportunities being explored and form part of the annual operating plan.

Updates:

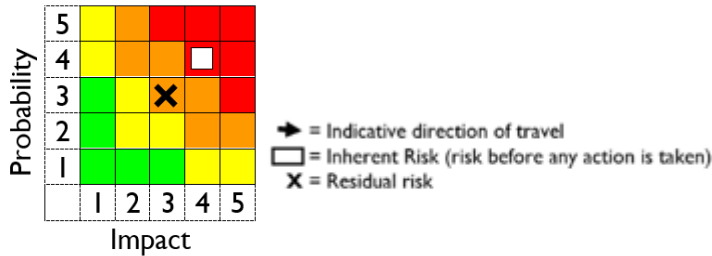
Further opportunities for income generation being explored along with how the incoming general power of competence for National Park Authorities will support this.

New Director of Growth and Corporate Strategy to lead on income generation.

Risk 3.1: Health and Safety

Owner: Vicky Paterson

The grid below highlights that the inherent risk is Possible with a Major impact and after mitigations it is scored Possible with a Moderate impact. Perceived direction of travel is no change.



Description of impact of risk:

Accident or incident involving staff, volunteers, visitors, Members or the public resulting in serious injury or death at an SDNPA facility or event. Breach of statutory duties, litigation and cost against the authority.

Mitigations:

1. Services of external H&S consultant retained
2. Internal H&S Officer in place.
3. H&S strategy and responsibilities agreed.
4. H&S elements included in induction programme for staff, Members, and volunteers.
5. H&S Committee operating and receiving regular accident reporting.
6. H&S policy and other supporting guidance (e.g. extreme weather) in place.
7. All area offices and Seven Sisters Country Park annually audited.
8. Annual report to P&R Committee with recommendations.
9. Members and SLT trained and briefed on H&S responsibilities.
10. All risk assessments reviewed and updated.
11. Dangerous sites process in place to highlight sites that staff may visit in their role which present particular risks to their H&S.
12. Additional H&S related training provided via e-learning, with fire safety and H&S delivered as mandatory courses.
13. IOSH training completed by all H&S Committee reps.
14. Trained first aiders in place
15. Lone working policy agreed by OMT.

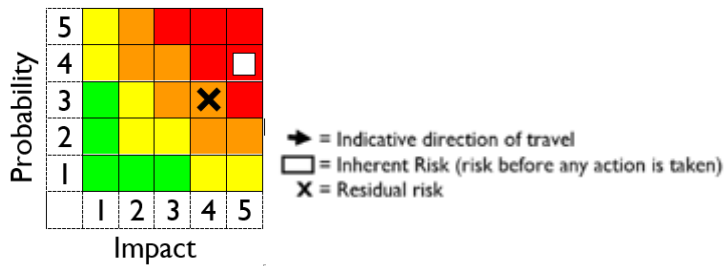
Updates:

None.

Risk 3.2: Seven Sisters Country Park – Health and Safety

Owner: Tim Slaney

The grid below highlights that the inherent risk is likely with a catastrophic impact and after mitigations it is scored as Possible with a Major impact. Perceived direction of travel is No Change.



Description of impact of risk:

Accident or incident involving staff, volunteers or members of the public resulting in serious injury, serious illness or death at a Seven Sisters Country Park (SSCP). Breach of statutory duties, litigation and cost against the authority. Reputation and financial impacts on the authority

Mitigations:

1. External H&S consultant advice
2. Risk assessments undertaken for high risk activities (e.g. provision of food).
3. SSCP staff represented on H&S committee
4. H&S responsibilities agreed.
5. H&S elements included in induction programme for staff and volunteers.
6. H&S committee receives regular accident reporting.
7. Site audits undertaken.
8. SSCP issues included in regular reports to P&R Committee.
9. All risk assessments reviewed and updated.
10. Additional site specific H&S related training (e.g. food hygiene).
11. IOSH training completed by SSCP Park Manager.
12. Trained first aiders on site.
13. Park signage in place to support visitor movements.
14. Fencing and systems in place to manage livestock on site.
15. Participation in partnership groups (cliff safety partnership and liaison with emergency services).
16. Insurance arrangements in place.
17. Actively pursuing improvements to the road crossing with highways authority.

Updates:

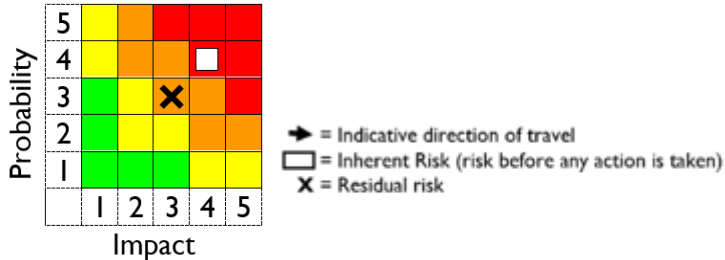
Programme of fencing replacement being undertaken at Seven Sisters Country Park.

Works approved to ensure the structural safety of New Barn Cottage.

Risk 4.1: Seven Sisters Country Park – Asset ownership

Owner: Tim Slaney

The grid below highlights that the inherent risk is likely with a Major impact and after mitigations it is scored as Possible with a Moderate impact. Perceived direction of travel is No Change.



Description of impact of risk:

Damage to or failure to maintain the asset causes environmental damage, legal challenge or dispute with tenants, reduction in visitor numbers or damage to SDNPA reputation.

Mitigations:

1. Insurance arrangements in place.
2. Operational risk register monitored by SSCP team.
3. Advice on operations through advisory group including external advisors.
4. Regular survey of river assets.
5. Fencing and systems in place to manage livestock on site.
6. Close working with water level management board and environment agency to fully understand management options in relation to riparian ownership.
7. New Barn cottage and barns, security measures to prevent unlawful occupation. Long term plan to prevent degradation of asset.

Updates:

Replacement sewage treatment system completed.

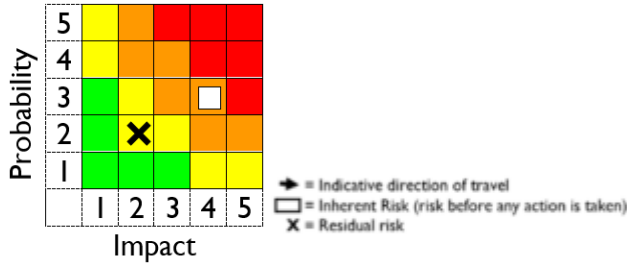
Programme of fencing replacement being undertaken at Seven Sisters Country Park.

Works approved to refurbish New Barn Cottage.

Risk 5.1: Business Continuity Planning and Organisational Resilience

Owner: Richard Sandiford

The grid below highlights that the inherent risk is Possible with a Major impact and after mitigations, it is scored as Unlikely with a Minor impact. Perceived direction of travel is No Change.



Description of impact of risk:

Lack of organisational business continuity planning and organisational resilience may prevent delivery of key services in the event of a major incident, cyber-attack, or as a result of the loss of key staff.

Mitigations:

1. Business Continuity Plan (BCP) in place and regularly reviewed for Authority and its offices.
2. Business Critical functions identified and planned for.
3. IT Disaster Recovery plans in place and tested annually.
4. Cyber incident response plans in place.
5. Key staff roles identified in BCP and communicated.
6. Documenting of key processes to mitigate points of failure.
7. Specific implications of IT provision addressed through day to day IT support functions being provided via outsourced contracts meaning that user support would not be immediately impacted by the departure or absence of the IT Strategy Manager.
8. IT network and key systems delivered externally via contracts.
9. Network Resilience and continuity issues have also been addressed via the IT contracts.
10. BCP for Seven Sisters Country Park in place.

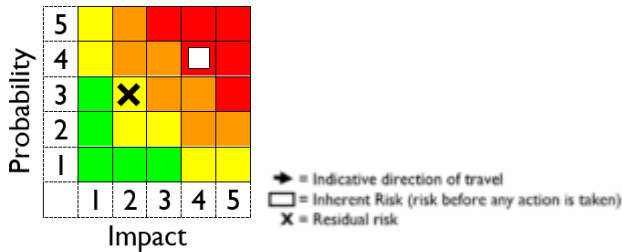
Updates:

Review of BCP underway. BCP testing to be undertaken following review.

Risk 7.1: Projects - External facing (Delivery and Reputation)

Owner: Siôn McGeever

The grid below highlights that the inherent risk is likely with a Major impact and after mitigations, it is scored as Possible with a Minor impact. Perceived direction of travel is No Change.



Description of impact of risk:

Failure to deliver key projects or Partnership Management Plan (PMP) outcomes due to lack of flexible resources and staff time within the SDNPA, unrealistic expectations or alignment with partner business plans and /or loss of commitment or ability to deliver from Partners. This could result in SDNPA reputation and influence with decision makers, partners and other stakeholders being negatively impacted.

Mitigations:

1. 2020-25 PMP in place, new approach to budget setting embedded, review process for next PMP underway having regard to the outcomes framework.
2. South Downs Partnership a key stakeholder supporting and informing the PMP Review.
3. Public affairs strategy and proactive comms: managing public expectations and setting out key messages to stakeholders and partners.
4. Project evaluation and lessons learnt reported to committee and used to inform future practice.
5. Development with the South Downs Trust of longer term and diversified streams of income.
6. Section 245 “seek to further” duty is a powerful tool supporting public bodies to take positive action in support of the National Park purposes and duty.

Updates:

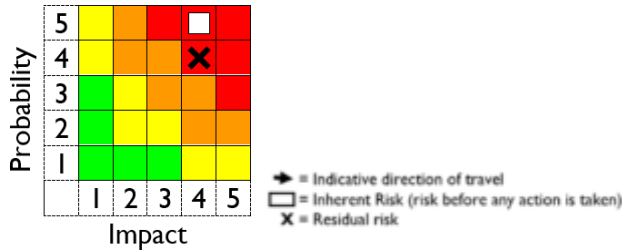
Successful securing of funding opportunities supports external projects with partners.

Use of specialist consultants to undertake engagement with partners to ensure a wide range of stakeholders are consulted to inform the review of the PMP.

Risk 8.1: Devolution in England and Local Government Reorganisation

Owner: Tim Slaney

The grid below highlights that the inherent risk is Almost Certain with a Major impact and after mitigations, it is scored as Likely with a Major impact. Perceived direction of travel is No Change.



Description of impact of risk:

The significant changes that will take place through devolution of power from Whitehall to strategic mayoral authorities and through local government reorganisation have the potential for wide ranging and substantial impacts on the National Park and the National Park Authority. As Hampshire and the Solent, and Sussex and Brighton have been accepted into the government’s devolution priority programme these changes will take place at pace. The risks include:

- Devolution and local government reorganisation may reduce the capacity of local authorities across the SDNP to be involved in other projects and could put at risk some of our partnership working. This is likely to be further exacerbated by inclusion in the devolution priority programme meaning a higher level of local authority resources are likely to be focussed on meeting the government’s ambitious timeline.
- It may be challenging to influence the development of devolution and local government reorganisation and where the NPA will sit within the hierarchy of local government within a strategic mayoral authority. As an MHCLG led initiative the NPA’s government department, Defra, is not directly involved in the development of devolution policy which could lead to the NPA being overlooked.
- The potential impact of the proposed local growth plans and mayoral powers on the SDNP and the NPA are currently unknown.
- With the move to single-tier (unitary) authorities the hosted planning arrangements (section 101 contracts) are at risk. If all these arrangements were to fall away there would be a substantial impact on the NPA and the Planning Directorate in particular.
- The move to single-tier (unitary) authorities will impact the Membership of the NPA with a lower number of local authorities appointing Members to the NPA.
- The SDNP will sit across two strategic mayoral authorities who may have different priorities and different views on the role of the SDNPA and the NPA.

Mitigations:

1. Monitoring of progress and updates by senior officers and efforts to work closely at senior level between the NPA and other local authorities to ensure the SDNP is considered in discussions and that impacts are clearly understood as proposals are developed.
2. Early engagement will be sought with leaders of new authorities (Mayors, Chairs, and Chief Executives) to understand priorities and identify opportunities to work together.
3. Discussions with Defra and MHCLG to cultivate a better understanding of NPAs as local authorities and the impacts of devolution and local government reorganisation on the NPA.
4. Working with NPE and Defra to influence the development of changing governance arrangements in the NPA.
5. Early consideration of implications for partnership projects and reassessment where expected

resources from local authorities may not be available due to capacity.

6. Early-stage workshop held with Members to consider opportunities and risks for the SDNP and the NPA of devolution and local government reorganisation.
7. Work to be undertaken to identify areas the NPA could support incoming mayoral and unitary authorities, particularly in specialist areas of expertise for the NPA.
8. Contingency plans to be developed for particular risk areas where identified.

Updates:

None.