

## **GMCA Audit Committee**

Date: 9 October 2019

Subject: GMCA Corporate Risk Register – October Update

Report of: Treasurer to the Greater Manchester Combined Authority  
Head of Audit and Assurance

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### **PURPOSE OF REPORT**

The GMCA governance and assurance framework includes regular review by Audit Committee of the corporate risk register. This report provides the latest update of the corporate risk register for October 2019.

### **RECOMMENDATIONS:**

Audit Committee is requested to consider and comment on the updates to the risk register and the associated actions and assurances provided.

### **CONTACT OFFICERS:**

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Risk Management – see Appendix A

Legal Considerations – see Appendix A

Financial Consequences – see Appendix A

Financial Consequences – see Appendix A

Number of attachments included in the report: None

**BACKGROUND PAPERS:** N/A

<b>TRACKING/PROCESS</b>		
Does this report relate to a major strategic decision, as set out in the GMCA Constitution		No
<b>EXEMPTION FROM CALL IN</b>		
Are there any aspects in this report which means it should be considered to be exempt from call in by the relevant Scrutiny Committee on the grounds of urgency?		No
TfGMC	Overview & Scrutiny Committee	
N/A	N/A	

## **1 Introduction**

- 1.1 The Greater Manchester Combined Authority (GMCA) risk management framework and Corporate Risk Register “CRR” support the identification and management of key strategic risks to the achievement of organisational objectives and actions considered necessary to mitigate them.
- 1.2 Under its terms of reference, Audit Committee oversees the effectiveness of the GMCA risk management arrangements over GMCA and GM Mayoral Functions. Audit Committee oversight includes high level consideration of the risk management frameworks in respect of police and crime; fire and rescue; and transport.
- 1.3 The GMCA (Full Authority) approves the GMCA corporate risk register following consideration by Audit Committee. This is done through GMCA review and agreement of the minutes of the Audit Committee, to which the corporate risk register will be appended.
- 1.4 The quarterly review of the CRR identifies and captures new risks, removes risks which are no longer relevant or significant and allows scrutiny and escalation of progress with actions.
- 1.5 The GMCA Governance and Risk Group consisting of senior officers from across various functions of the GMCA has a lead responsibility for managing the process of refresh of the CRR. This includes providing initial oversight and scrutiny, recommending changes to the risks on the register and nominating candidates for inclusion or removal from the CRR. The Group meets quarterly, supporting the review process on behalf of GMCA Senior Management Team (“SMT”). SMT retain overall ownership and responsibility for the final content of the CRR and management of key strategic risks, actions and assurances.
- 1.6 The CRR contains both GMCA and GM Mayoral risks and incorporates high level risk considerations from other areas where it directly impacts on GMCA. Risk management frameworks and risk registers for GMP, TfGM and GMFRS will continue to be owned by the Chief Constable, Chief Executive TfGM and Chief Fire Officer.

## **2 Update**

- 2.1 The GMCA Governance and Risk group met in September 2019 to review and update the CRR prior to review by SMT and onward reporting to Audit Committee. The CRR captures only the high level strategic risks facing the GMCA which are of such significance they require SMT oversight and assurance.
- 2.2 This was the second quarterly review for 2019/20. The “anticipated” risk status for March 2020 has not been updated and as such risk owners will be asked to consider their anticipated risk score and their ability to manage and control identified risks as part of the January update.

2.3 The Head of Audit and Assurance has assumed responsibility for risk management across GMCA. An organisation-wide risk management framework will be developed and rolled out across GMCA over the next 12 months. The purpose of this will be to ensure that risk management is undertaken consistently across GMCA and that there are appropriate mechanisms in place for the identification, monitoring, management and escalation of operational risks which will complement the mechanism already in place for the management of strategic risks.

### **3 Corporate Risk Register (CRR) October 2019 Update**

3.1 The second quarterly update of the CRR for 2019/20 shows 18 risks recorded in the register.

3.2 There were no material changes to the GMCA risk landscape with only some minor changes to risk scores and actions. The number of high risks recorded reduced from four to three, with one new risk added to the register and one risk removed during this quarter.

3.3 The risks are captured under the agreed thematic risk headings. Any movement in the risk status is provided alongside updates of key actions, assurances and associated timelines.

3.4 The review concluded by the Governance and Risk Group and subsequent review by SMT recommended the following key changes be made to the CRR set out below. The full revised CRR including key actions is attached at **appendix A** to this report.

- **R1 Brexit;** risk status remained high to reflect the potential of a no deal BREXIT on 31 October 2019 and recognising that this risk remains volatile. This risk is being monitored separately as part of the GMCA and GM BREXIT Readiness Group and captured on a BREXIT readiness action plan.
- **R2 Independent reviews;** at the time it was added in December 2017 there was a risk that the GMCA did not have the governance arrangements and capacity to support and manage the outcomes of independent reviews. Since that time the GMCA has demonstrated that it is indeed able to do this as demonstrated by its response to the Kerslake report. It is therefore proposed to remove this risk from the risk register.
- **R10 Information Security** risk remained high and reflected the risk level on the national cyber security register. There are several planned actions in this area which are shown in the activity update.
- **R11 Business continuity;** it was proposed that a risk around organisation wide business continuity should be included to ensure that GMCA has appropriate mechanisms in place to ensure disruption to services is minimized in the event of an organisation wide incident.
- The **R13 Procurement, Commissioning and Contract Management** risk was reduced from High to Medium . The SIP Contracts and Procurement review is still ongoing , which takes into account grant management for programmes and projects. Controls have been strengthened with the introduction of a new bid management process and stronger joint working with TfGM to manage the Local Growth Fund Programme.

- **R19 Government Support for Housing Delivery** was still deemed high risk, with the Housing deal unlikely to proceed and alternative arrangements being discussed with Homes England.

3.5 One other potential new risk was identified as part of the update process. This was in relation to the Climate Emergency and the potential consequences of that for the GMCA. Further work will be undertaken to fully explore and quantify that risk to determine if it should be included in the Corporate Risk Register going forwards.

3.6 Risks are captured under seven thematic categories shown below to aid understanding, review and analysis. The risk summary profile has been updated to take into account the changes to risk status.

Thematic Area	High	Medium	Low
Environment and Context	1		
Finance and Resources		2	1
Governance and Organisation	1	4	
People		1	
Statutory and Compliance			
Devolution and Powers		2	
GM Strategy, GM Priorities and Strategic Initiatives	1	5	
<b>Total</b>	<b>3</b>	<b>14</b>	<b>1</b>
<i>Proposed for Removal</i>	<i>0</i>	<i>1</i>	<i>0</i>

## 4 Recommendations

4.1 Audit Committee is requested to consider and comment on the updates to the risk register and the associated actions and assurances provided.

## APPENDIX A: GMCA Corporate Risk Register October 2019

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Anticipated Risk March 2020	Current Risk Score (IxL)	Previous Risk Score	Key Actions and Deadlines and Audit Activity
1	Aug 2016	Environment and Context	<p><b>Brexit:</b> Uncertainty about the future UK relationship with the EU creates a volatile operating environment for the GMCA. Impacts may include economic, financial, social and policy developments to which the GMCA must adapt.</p> <p>The GMCA is vulnerable to immediate impacts when Britain leaves the EU in addition to attrition impacts emerging from any economic turbulence.</p>	<p>Impact on progressing the GMS and assumptions made within planning.</p> <p>Potential short, medium or long term impacts on the economy.</p> <p>Potential for increasing product scarcity and price inflation.</p>	Chief Executive: Eamonn Boylan	<p>1. <b>Monthly Brexit Monitor</b> update report to track developments and support GMCA decision making.</p> <p>2. <b>Ongoing Mayoral, Leaders and Chief Officer engagement</b> with Government Departments.</p> <p>3. Brexit Monitor is a standing agenda item on Economy, Business Growth &amp; Skills Overview&amp; Scrutiny Committee.</p> <p>4. <b>Ensure GM involvement in UKSPF design</b> (the replacement for EU structural funds).</p> <p>5. <b>GMCA and GM Brexit Readiness Group</b> established and meeting regularly. Potential risks to GM and GMCA being examined and captured on a Readiness Action Plan. All LAs have now appointed at BREXIT Liaison Officer (BLO) who have joined the GM Readiness Group</p>	High	High 5x4=20	High	<p>Risk likelihood increased again due to potential of no deal BREXIT on 31 October 2019 - recognition that risk remains volatile.</p> <p><b>Joint work between GM Readiness Group, LRF and Economic Resilience Taskforce</b> will be essential over the coming months, ensuring District BLOs are fully engaged.</p> <p>Economic Resilience Taskforce developing and testing appropriate responses for any economic shocks that may occur</p> <p>Additional exploration of links between GMCA and Fire RRs and attribution of</p>

BOLTON  
BURY

MANCHESTER  
OLDHAM

ROCHDALE  
SALFORD

STOCKPORT  
TAMESIDE

TRAFFORD  
WIGAN

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						<p><b>6. Engagement of Chief Resilience Officer</b> in appropriate Civil Contingency planning via Local Resilience Forum.</p> <p>7. Risk also captured on Fire Risk Register.</p> <p><b>8. Economic Resilience Taskforce</b> set up between key partners to track economic trends and take early action to support businesses and individuals affected</p> <p><b>9. Co-ordination between LRF and GM BREXIT Group</b> agreed</p>				mitigation responsibility.

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2	Dec 2017	Governance and Organisation	<b>Independent Reviews:</b> Corporate governance arrangements, combined with staff capacity are inadequately aligned to respond to the outcomes of independent reviews including Lord Kerslake Report, Child Sexual Exploitation and Cohesion.	Actions required in response to findings and recommendations from these reviews could impact on our ability to deliver current and planned priorities and activities.	GM Mayor and Deputy Mayor (Policing and Crime)  Chief Fire Officer  Chief Executive: Eamonn Boylan	Engagement with new initiatives and reviews and management oversight of potential resource implications.  Oversight and reporting to GM Mayor and Deputy Mayors, GMCA, Scrutiny Committees and Police and Crime Panel.  <b>Kerslake Report:</b> The risk has been mitigated by the approval of funds to support the delivery of transformational change across GMFRS.  <b>Kerslake</b> — implementation of recommendations completed under the governance of the Local Resilience Forum (LRF)  Transformational Change Programme (PFC) has governance arrangements in place including steering group Chaired by Mayor, supported by specifically resourced team.	Medium	Medium 4x3=12	Medium	<b>CSE</b> — the Police and crime plan 2018-21 includes specific focus on implementation of recommendations from the CSE review. An assessment of capacity required will follow. <b>Cohesion</b> — The report was launched in July 2018 and a series of recommendations published.  Summary report published in November 2018 on the findings and recommendations including the proposals in respect of future governance arrangements at GM/district and organisational levels.  Recommendations of capacity assessment have been endorsed.

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3	Dec 2018	Devolution and Powers	<p><b>Devolution:</b> Capacity for and commitment to devolution from Central Government wanes.</p> <p>Previous commitment to extension of powers for the GMCA fails to materialise.</p>	<p>The talk about potential devolution from the new Prime Minister and Government has increased. However it will be key to ensure words are turned into actions to ensure GM's control over its future direction and delivery of the Greater Manchester Strategy.</p>	Chief Executive: Eamonn Boylan	<p><b>On-going monitoring of current Devolution Deals</b>, partly via the GMS 6 monthly monitoring.</p> <p><b>Local Industrial Strategy</b> agreed with Government and published although it does not give complete clarity re national devolution work programmes.</p> <p>GM has input into the Spending Review and will input into the forthcoming Budget and SR2020.</p> <p><b>Ongoing input into Government departments</b> on key areas of policy – such as GMSF/town centre development</p>	Medium	Medium 3x3=9	Medium	Risk needs to be kept under review as new Government policy evolves, and in the light of BREXIT.
4	Dec 2017	Devolution and Powers	<p><b>Bus Reform:</b> Approval and successful Implementation of bus reform deriving from the Bus Services Act 2017 is threatened by challenge to GM proposals, delays in regulations and orders or financial / resource capacity.</p>	<p>The expected benefits of reform may not be realised through the required regulations and orders.</p> <p>Delays in orders and in process could impact adversely on successful reform.</p>	Chief Executive: Eamonn Boylan	<p>1. Ongoing senior level officer and political engagement with Government.</p> <p>2. Bus reform project being managed though dedicated TfGM resources and reported through TfGM risk and assurance arrangements.</p> <p>3. GMCA/Mayor/Districts have agreed a reformed TfGMC and to amend the Operating Agreement.</p>	Medium	Medium 3x3=9	Medium	<p>Order came into force on 4 April 2019.</p> <p>Continuous engagement with MHCLG.</p> <p>A review of the audit report and the assessment is required before deciding whether to proceed to proceed with a public consultation</p>

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			The required clarity from governmental Transport Orders is slow to emerge. Affecting the CA's ability to assure plans are aligned to national policy.			<p>6. Statutory Instrument (Greater Manchester Combined Authority (Functions and Amendment) Order 2019) came into force on 4 April 2019.</p> <p>7. Reformed GM Transport Committee established and amended Operating Agreement</p> <p>8. Constitution revised to reflect Mayoral bus powers</p> <p>9. Assessment of proposed bus franchising scheme completed</p> <p>10. Audit of assessment recently completed</p>				

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5	Dec 2017	People	<b>Staffing Capacity:</b> Staffing structures, resource, capability and capacity are not sufficient or suitably aligned to support delivery of core objectives and ongoing areas of development in agreed or emerging priority areas.	<p>Insufficient capacity and a changing demand on skills and abilities of existing resources may impact on delivery and development of priority activities meaning organisational objectives are not delivered in line with required deadlines and plans.</p> <p>Unable to respond to changing priorities and new initiatives.</p> <p>Increased demands and pressures on staff could impact upon wellbeing and attendance / absence levels.</p>	<p>Deputy Chief Executive: Andrew Lightfoot</p> <p>Strategic Director HR/OD: David Alexander</p>	<p>1. <b>Strategic Performance Framework and dashboard</b> designed and in use.</p> <p>2. The <b>business planning process</b> is being more closely aligned to the Personal Objective setting process.</p> <p>3. The <b>SIP programme</b> has been adjusted to take into account longer term capacity and capability requirements and the SIP Programme Board in place provided focused review of emerging staffing issues.</p> <p>4. <b>GMS and implementation plan</b> agreed and in place. GMCA wide review of services and structures agreed and delivery is underway.</p> <p>5. Dedicated support in place to support <b>GMFRS service Programme for Change</b> (Pfc).</p> <p>6 <b>Digital Strategy</b> supports new ways of working and focuses on increasing capacity.</p>	Medium	Medium 4x2=8	Medium	<p><b>Business planning activity</b> to be completed by end April 2019</p> <p><b>Objective setting</b> to be completed by 30<sup>th</sup> June 2019.</p> <p>Completion of <b>service reviews</b> is underway and progressing. Progress has been re-prioritised based on risk and implementation of PFC. Expected completion has slipped to early 2020.</p> <p><b>Accelerated recruitment process</b> for Organisational Critical roles maintained throughout the HR and OD review. <b>Action</b> – to identify and map all statutory and business critical roles Bid included in 2019/20 budget for further internal</p>

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						8. <b>GMCA OD strategy</b> has been implemented.				<p>investment in ICT approved.</p> <p><b>GMFRS Programme for Change</b> commissioned and underway. This is a whole service transformational review.</p> <p>Specific Governance arrangements have been put in place to track progress and consider wider impact including programme risk.</p>

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6	Dec 2017	Finance and Resources	<p><b>Use of funding:</b> Total GMCA funding is insufficient and/or unaligned to support and deliver on devolved duties and powers; and the priorities set out in the GM Strategy and Mayoral Manifesto.</p> <p>Government review and future of, Earnback Funding not to be finalised until March 2020 for five year funding package from April 2020.</p>	<p>Potential imbalance between funding and priorities may mean existing initiatives and future plans and ambitions are not delivered in full.</p> <p>GMCA is exposed to potential changes in government policy that affect planning and finance assumptions. Ring fencing of Central Government funding does not align fully with GMS or other GM priorities which impacts outcomes.</p>	GMCA Treasurer: Richard Paver	<p>1. <b>Revised GMS and Implementation Plan</b> led by GM Mayor, Chief Executive and Senior Management Team</p> <p>2. <b>Revised governance structure</b> set out in the constitution</p> <p>3. Oversight at GMCA, Wider Leadership Team and Scrutiny Committees</p> <p>4. <b>Lobbying of Government</b> by Regional Leaders</p> <p>5. <b>Annual budget setting and financial strategy process</b> including retaining adequate reserves</p> <p>6. <b>GMCA borrowing powers</b> available to support capital investment if required</p> <p>7. GMCA together with other Combined Authorities, are making representations to MHCLG regarding ongoing funding needs for Mayoral Combined Authorities, particularly around retaining a share of Business rates growth.</p>	Medium	Medium 4x3=12	Medium	<p>Following appointment of shared Chief Exec with TfGM work is underway to assess the possibilities for closer working and delivering operating savings. This will feed into medium term budget and financial planning processes.</p> <p><b>Comprehensive Spending Review – 2019/20</b> is the final year of the 4 year settlement. However due to Brexit a one year settlement was announced in September. Settlements from April 2021 will be informed by both the <b>CSR and the Fair Funding Review</b> together with any transitional arrangements put in place.</p> <p>GMCA has been requested by MHCLG</p>

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										<p>to submit details of programmes and budgets over this and the next 3 years to help in their consideration of funding needs across the possible CSR period.</p> <p>GMCA personnel to work with CLG to inform and shape the <b>new prosperity fund</b> (post Brexit).</p>

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7	Dec 2017	Finance and Resources	<p><b>a) Capital Programme:</b> Regeneration, infrastructure and investment funding (Growth Deal, Transport Grant etc.) awarded to GMCA is not spent in line with spending profile and this impacts future year financial awards.</p> <p><b>b) Programme Governance:</b> Reform and investment programmes are not supported by robust evaluation and subsequent programme and project management arrangements to assure delivery of outcomes across GMCA schemes such as:</p>	<p>Failure to deliver the capital programme and delays in delivery of schemes by districts and TfGM could result in reductions to future funding allocations and increased risk of clawback.</p> <p>Impact on the ability to secure value for money and achievable outcomes set out in the GMS.</p> <p>Measurement of impacts and outcomes may not be effective in supporting future decision making.</p> <p>Lack of confidence from key partners and funders could</p>	Chief Executive: Eamonn Boylan	<p><b>1. Single Pot Assurance Framework</b> updated in light of new national guidance and a review of GMCA current practices.</p> <p><b>2. Gateway processes</b> for scheme appraisal and approvals.</p> <p><b>3. Reports to Chief Executive's Investment Group (CXIG)</b> and GMCA Board on scheme progress and delivery of the Capital Programme.</p> <p><b>4. Mature TfGM governance arrangements</b> and reporting into the GMCA. For major transport schemes, reliance is placed on TfGM to oversee programme delivery, budget profiling and expenditure forecasts.</p> <p><b>5. Oversight</b> by Scrutiny Committee, TfGM Committee and sub committees.</p> <p><b>6. Performance monitoring framework</b> linked to GMS and GMCA business plan.</p>	Medium	Medium 3x3=9	Medium	<p>Clear <b>bid management process</b> now introduced within GMCA. This will be expanded to become a contract and grant management system over the coming months, as part of the SIP review into Procurement, Contracts and Grant Management.</p> <p>A review of the way LGF is managed undertaken following LEP 'requires improvement' score on delivery. Far stronger <b>joint working with TfGM to manage whole LGF programme</b> in accordance with expectations from MHCLG. Actions by MHCLG following recent meeting will further increase the consistency of how GM's performance is treated compared with</p>

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			<ul style="list-style-type: none"> <li>• Evergreen</li> <li>• HILF</li> <li>• Work and Health</li> <li>• Local Growth Fund (LGF)</li> <li>• Skills &amp; Employment</li> </ul>	impact future funding awards		<p>7. Agreement to <b>have quarterly relationship management</b> meetings with GMCA/Growth Company.</p> <p>8. Meeting held with Government to <b>agree reporting on LGF</b> to ensure consistency with other areas, and how different levels of spend/commitment will be viewed by Govt</p>				<p>other areas. Plans in place and agreed by LEP/CA to increase rate of LGF spend on projects</p> <p><b>GMCA Capital Programming and Treasury Management function</b> to be established in Finance to help to ensure that bidding and programming is aligned with priorities and cash flow is managed in the short, medium and long term for GMCA.</p>
8	Dec 2017	Finance and Resources	The 10 year £300m recyclable <b>Housing Investment Loan Fund (HILF)</b> may not provide the required number of homes or generate return on investment at the expected rate, with a risk of capital shortfall	HILF does not generate the required rate of return on investment above which the GMCA and districts become liable.	Chief Executive: Eamonn Boylan  Andrew McIntosh Investment Director	<p>1. Maximum shortfall of £240m underwritten by districts.</p> <p>2. HILF S151 grant certification (annual) by Internal Audit has provided positive assurance.</p> <p>3. GMCA Core Investment Team responsible for controlling HILF</p>	Low	Low 3x2=6	Low	<p>Risks underwritten by the GMCA following completion of novation.</p> <p>Operational arrangements to follow standard GMCA financial processes.</p>

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			of >20% which would fall to districts.			<p>and oversight by GM Growth board.</p> <p>4. HILF financial stability and control further strengthened by borrowing Powers and planned novation of loans.</p> <p>5. Full bids for Housing Infrastructure Fund submitted and other opportunities to secure additional resources followed up.</p> <p>6. Statutory powers novated from Manchester City Council.</p>				On Audit Plan-Q4
9	Dec 2017	Governance and Organisation	<b>Behaviours and Culture:</b> The Culture of the CA fails to adapt to changing organisational demands which in turn impairs efficiency and delivery.	Conflicts between desired and actual GMCA culture and standards impacts on consistency of approach.	Deputy Chief Executive: Andrew Lightfoot	<p>1. <b>OD strategy</b> for GMCA as a whole and organisational orientation and induction. OD strategy approved and implemented.</p> <p>2. <b>Development of Extended Leadership Team</b> and 'lunch and</p>	Medium	Medium 3x3=9	Medium	<p><b>Completion of service reviews</b> in line with agreed plan and timescales.</p> <p><b>"We are GMCA"</b> sessions available to all</p>

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				<p>Inconsistency of approach could impact efficiency and the potential benefits that derive from integration and collaboration across the GMCA.</p> <p>Culture inertia could result in an inability to retain staff, increase employee relation caseload, and increase pressures on recruitment.</p>		<p>learn / meet the team' sessions to help raise awareness of work across teams.</p> <p>3. <b>Regular communications</b> from GM Mayor and Chief Executive, including intranet content and all-staff sessions to engage on vision on strategy.</p> <p>5. <b>Accelerated People Review</b> (with authority to reallocate resources) is ongoing.</p> <p>6. <b>Staff engagement survey</b> to be introduced in Q3.</p> <p>7. Pfc has a separate <b>workstream looking at culture</b> of the GMFRS.</p>				<p>staff – immediate and ongoing</p> <p>Away Day planned with EMT. <b>ELT restructured</b> and supported with External facilitation – <b>Completed</b></p> <p><b>Deliver personal appraisals</b> within the new model.</p> <p><b>Engagement survey</b> action planning to be introduced from Jan 20 Consider strategies to ensure that cultural development is pursued at all levels.</p>

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10	Dec 2017	Governance and Organisation	<b>Information security:</b> is insufficient to deter, detect and prevent unauthorised access to ICT systems.	<p>Potential loss of information or data, ICT downtime and costs of remediation.</p> <p>Partner and wider public confidence could be impacted should security issues arise.</p> <p>Ability to pool/share data with third parties could be impacted if the GMCA cannot demonstrate compliance with requirements of the Public Service Network or other security accreditation.</p>	Deputy Chief Information Officer: Cara Williams	<ol style="list-style-type: none"> <li>Governance created to support the strategic direction of ICT/Digital and, separately, IG to improve cyber security.</li> <li><b>Majority of ICT infrastructure is based on mature GMFRS network, systems and applications.</b> Further investment being made in technology to secure the network and enable secure multi-agency working. Wide Area Network to PSN standard implemented by end Dec 2018.</li> <li><b>Investment in tools</b> to scan the infrastructure to ensure that vulnerabilities are identified and addressed.</li> <li>Support provided through <b>training online</b> (LMS) and information on the GMCA intranet. Training on information security tracked through SMT.</li> </ol>	Medium	High 4x4=16	High	<p>Governance and Risk group reviewed this in May 19. Cyber security remains one of the top 3 risks on the National Register. No Change</p> <p><b>Work towards government standard security across GMCA ICT networks.</b> PEN test arranged for April 2019 This was completed in July 2019. Currently pursuing achievement of Cyber Essentials plus status – deadline Dec 2019</p> <p>Completion of GMCA business continuity plan in progress but dependent on the quality of service BC planning.</p> <p><b>Security Incident processes</b> being developed to ensure a rapid response to</p>

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						<p>5. <b>Security Incident processes</b> and core switch upgrade completed Q3.</p> <p>6. Annual test of BC Planning in Fire</p> <p>7. Audit Report 2018 provided independent assurance- Action Plan to be reviewed June 2019.</p>				<p>cyber incidents. <b>COMPLETED</b></p> <p><b>Procedures documented</b>, tested and used. – These are to be reviewed and refreshed. This is currently under review.</p> <p>Continue efforts to <b>recruit ICT Security Manager</b> Job re-sized to reflect market rates to be re-advertised by mid-April 2019. Temporary resource in place to support specific ICT Security improvements. <b>ICT Security Manager out to recruitment – interviews end of Sept 2019. Contract resource in place in the interim.</b></p> <p><b>WAN/LAN upgrade</b> and managed service –</p>

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Anticipated Risk March 2020	Current Risk Score (IxL)	Previous Risk Score	Key Actions and Deadlines and Audit Activity
										Mar 2019. <b>COMPLETED</b>  Consideration of cyber security Insurance and threat monitoring. <b>Enhanced threat monitoring now in place.</b>
11	Oct19	Governance and Organisation	<b>NEW RISK Business Continuity and Contingency Planning</b> There is no organisational wide BC plan to respond to a major incident or lower level disruption to service.	<ul style="list-style-type: none"> <li>Lack of a coordinated and focussed response.</li> <li>Could result in Major service disruption.</li> <li>Potential loss of key business systems / data.</li> <li>Staff welfare</li> <li>Reputational damage</li> <li>Potential non-compliance with CCA legislation.</li> </ul>	Assistant Director Governance and Scrutiny: Julie Connor	<ol style="list-style-type: none"> <li><b>Specific Fire and Rescue Service BC Plan in place.</b></li> <li><b>Multi- agency emergency response</b> through GM Resilience Forum.</li> <li><b>ICT business continuity plans</b> to cope with untoward incidents. Key applications identified and managed. Initial assessment of priority assigned. Information Asset Owners identified at Leadership level.</li> </ol>	Medium	Medium 4x4=16	N/A	Review of Business Continuity (BC) arrangements and potential exercise for GMCA. This will follow on from the Fire BC plan and plan testing during 2019.
12	Dec 2017	Governance and Organisation	<b>Information Governance:</b> Arrangements are insufficiently	Potential inability to demonstrate GDPR compliance (by May 2018) and ensure	GMCA Treasurer:	<b>GDPR Work programme and IG implementation</b> led by the Assistant Director of Information	Medium	Medium 4x3=12	Medium	Develop effective mechanism for review and endorsement of IG and related policies.

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			developed to meet obligations placed upon the organisation by Information legislation. Inclusive of Data Protection and transparency laws. Including expected organisational standards in respect of information management and governance.	<p>effective information management and governance arrangements could result in:</p> <ul style="list-style-type: none"> <li>• Breaches of legislation</li> <li>• Judicial review</li> <li>• Litigation</li> <li>• Claims</li> <li>• Reduced transparency and visibility of information and data</li> <li>• Reputational damage arising from breaches</li> <li>• Loss of public Trust</li> <li>• Inability to secure data sharing agreements with partners / Government.</li> <li>• Detrimental impact on GM wide</li> </ul>	<p>Richard Paver (as SIRO)</p> <p>GMCA Monitoring Officer: Liz Treacy</p> <p>Phillipa Nazari Assistant Director IG and DPO</p>	<p>Governance and Data Protection Officer.</p> <p>Programme has been developed to address priority areas.</p> <p><b>Data Protection Policy</b> been through governance and ready for adoption.</p> <p>Project Manager appointed (August 2018).</p> <p><b>Training modules for staff</b> launched. Training completion is being monitored.</p> <p><b>Data Breach Panel</b> established. Information Governance Board established for the organisation.</p> <p><b>Review and alignment of IG processes</b> underway and formation of IG function is ongoing.</p> <p><b>Policy Working Group</b> set up to review c30 policies to comply with GDPR.</p>				<p><b>COMPLETE</b></p> <p><b>IG implementation Programme</b> drafting policies with oversight from IG board members agreement by trade unions and sign off by SMT. <b>COMPLETE</b></p> <p>Engage with Trade Unions where required. <b>COMPLETE</b></p> <p>Establish and drive appropriate GDPR Working Groups. See update above</p> <p>Drive processes to assure completion of training. SMT monitor progress on Data Protection training via monthly updates.</p> <p><b>Tender for and procure necessary IG software</b> (funding approved) IG Team members being trained</p>

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Anticipated Risk March 2020	Current Risk Score (IxL)	Previous Risk Score	Key Actions and Deadlines and Audit Activity
				programmes of work						<p>on existing software to undertake information audits. Further software being considered to support security. Centralised IG Team being restructured to ensure resilience and continuous support to the organisation.</p> <p><b>Procure and develop new engaging training modules</b> to support the organisation.</p>
13	Sept2018	Governance and Organisation	<p><b>Procurement, Commissioning and Contract Management:</b> Three elements to this risk</p> <p>a) <b>Contract Governance</b></p>	<p>Lack of strategic oversight over commissioned activity.</p> <p>Resourcing, capability and capacity for</p>	GMCA Treasurer: Richard Paver	<ol style="list-style-type: none"> <li><b>Utilising procurement and commissioning expertise</b> from Fire and Rescue and partner organisations including TfGM, STaR and external.</li> <li><b>GMCA Constitution and Procurement Rules.</b></li> </ol>	Medium	Medium 4x3=12	High	<p><b>SIP Contracts and Procurement Review</b> now underway including a review of grant management.</p> <p><b>Contract Register</b> being populated to</p>

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Anticipated Risk March 2020	Current Risk Score (IxL)	Previous Risk Score	Key Actions and Deadlines and Audit Activity
			<p>arrangements are insufficiently developed to provide a consistent organisation approach.</p> <p><b>b) Grant management</b> arrangements are insufficiently resourced post grant award, with lack of clarity about who is managing ongoing adherence to grant conditions with third parties.</p> <p><b>c)</b> Difficulties in managing the complexity of grant funding streams across organisations and within individual projects.</p>	<p>effective commissioning and contract management remains a challenge.</p> <p>Policy, systems and processes are insufficiently developed to support consistent practice.</p> <p>Contract design and performance framework leads to inconsistent contract governance.</p> <p>Risk of grant conditions not being met, and clawback of funding.</p>		<p>3. Existing GMCA policies, procedures and codes of conduct.</p> <p>4. <b>SIP Contracts and Procurement Review</b> now underway including a review of grant management funding within projects. Contract Register being populated to ensure oversight of all procurement and commissioning related activity, and to determine Procurement Forward Plan. Resources from AGMA Hub and Star used to supplement GMCA resources.</p> <p>5. <b>Contract management</b> arrangements being reviewed. <b>Critical friend review</b> underway.</p>				<p>ensure oversight of all procurement and commissioning related activity, and to determine <b>Procurement Forward Plan</b>. Resources from AGMA Hub and Star used to supplement GMCA resources.</p> <p><b>Bid Management template</b> now introduced to ensure all bids are being captured. This will be further developed into a consistent contract/ grant management process following the review above, and to ensure consistent governance/reporting</p> <p><b>LGF New post</b> appointed to manage non-transport LGF programme, including Skills Capital, as a whole.</p>

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Anticipated Risk March 2020	Current Risk Score (IxL)	Previous Risk Score	Key Actions and Deadlines and Audit Activity
										Management of overall LGF programme now significantly improved following appointment of new post. See Risk 7 above for details.
14	Dec 2017	GM Strategy, GM Priorities and Strategic Initiatives	<p><b>External facing Digital Strategy:</b> The plan, capacity, funding and resources required to deliver the strategic vision and scope of the GM digital and information management agenda is not sufficient to support achievement of stated priorities.</p> <p>The plan does not assure adequate alignment to Health and Social Care.</p> <p>Specific risks relating to the GM Full Fibre procurement and programme as a result of government funding restrictions,</p>	<p>Uncertainty over affordability and lack of capacity means key elements of the strategy delivery could be at risk.</p> <p>The lack of a GM wide architecture and approach to development could result in under or missed delivery of key enablers for reform.</p> <p>Risks to the Full Fibre programme could result in partial or whole failure of the initiative.</p>	Chief Information Officer: Phil Swan	<p>CIO and AD for Creative &amp; Digital Policy &amp; Strategy overseeing work programme and deliverables.</p> <p>Tony Oakman, CEO Bolton Council, and Cllr Andrew Western, Leader of Trafford Council, activity involved and engaged.</p> <p><b>GM Digital Steering Group</b> providing support, guidance input and review for updated of GM Digital Strategy</p> <p><b>Reform Board oversight</b> of Early Years digitisation planning and programmes.</p> <p><b>Unified Architecture Programme Board</b> chaired by Andrew Lightfoot, Dep CEO of GMCA.</p>	Medium	Medium 3x4=12	Medium	<p>Risks to <b>Unified Architecture</b> work mapped and managed through regular UA Programme Board meeting. Being taken to Scrutiny and GMCA Board in June 2019 to agree to award contracts.</p> <p><b>Full Fibre</b> risks being managed via the FF Programme Board and actions associated with these, however are dependent on government decisions and procurement responses. Decision to come to GMCA Board in July 2019.</p>

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Anticipated Risk March 2020	Current Risk Score (IxL)	Previous Risk Score	Key Actions and Deadlines and Audit Activity
			realisation and benefits by local authorities and GMCA.			<p><b>Full Fibre Programme Board</b> and related Digital Infrastructure Advisory Board.</p> <p><b>Governance arrangements across H&amp;SCP and GMCA</b> activity on the architecture- quarterly meetings to ensure alignment of programmes and design of GM wide architecture.</p>				<p>The <b>refresh of the GM Digital Strategy</b> includes proposals for more joined up pan GM governance and will streamline current decision making, particularly for joint work with HSCP.</p> <p>A proposal is being prepared for the GMCA Board in June / July for resource to support the GM Digital Strategy implementation. This has been reviewed by the SIP Board and is being refined.</p> <ul style="list-style-type: none"> <li>• SIP proposal has been presented (May 19)- move to implementation phase</li> </ul> <p>Planned Internal Audit review of ICT Strategy, Governance and Programme</p>

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Anticipated Risk March 2020	Current Risk Score (IxL)	Previous Risk Score	Key Actions and Deadlines and Audit Activity
										Management to be completed in Q1 2019.
15	April 2018	GM Strategy, GM Priorities and Strategic Initiatives	<p><b>Adult Education Budget</b> devolution will give GMCA a range of statutory obligations from 2019/20 academic year but budget will be confirmed on an annual basis based on a fixed market share (7.19%) of the national AEB pot. Government is not able to guarantee future funding due to HMT cycle.</p> <p>Number of GM residents theoretically entitled to free learning outstrips resources. No in-year funding for growth will be available from Government.</p>	<p>If funding ceased, GMCA would have statutory obligations without the means to discharge them. As well as the legal implications for CA, this could cause financial difficulties for colleges/training providers, and delay crucial skills training for residents.</p> <p>Running out of funding could result in having to defer skills programmes for GM residents, including legal entitlements, until such time as additional funding is available.</p>	Assistant Director: Gemma Marsh	<p><b>MoU with DfE (Dec 2018)</b> recognises formally that GM is reliant on funding from government each year in order to meet statutory duties. Likelihood of funding ceasing completely is extremely low, although annual fluctuation is likely linked to overall funding levels, which are uncertain going into the Spending Review.</p> <p>Historic trends indicate that likelihood of demand exceeding budget is highly unlikely. Should this occur, deferring enrolments would enable GMCA to discharge obligations as statutory entitlements are not timebound. Proactive in-year performance management systems will enable GMCA to respond to under/over delivery requests.</p>	Low	Medium 4x3=12	Medium	<b>Discussions ongoing with DfE/ESFA around scope for joint audit code of practice</b> between ESFA and mayoral Combined Authorities – service offer agreed with ESFA for 2019/20 which will provide three additional audits of GMCA-contracted providers to augment local arrangements. Arrangements are in place to enable mayoral combined authorities to purchase additional audit activity from the ESFA’s framework of procured audit firms to should we wish to do so.

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Anticipated Risk March 2020	Current Risk Score (IxL)	Previous Risk Score	Key Actions and Deadlines and Audit Activity
			<p>Data and systems are not sufficiently robust or developed to enable efficient management, payment or analysis.</p> <p>Learner choice cannot be restricted, causing issues in 'border' areas where GM residents may travel to learn out of area with providers which don't have contracts in place with GMCA – this may include learning which is part of an entitlement that GMCA is legally bound to make available.</p> <p>Gaps in might become apparent in-year with demand for high-demand courses that are not currently available from the commissioned provision.</p>	<p>Risk of disruption or financial difficulty for providers if data/payments system fails.</p> <p>Failure to discharge our legal obligations to ensure statutory entitlement provision is available to GM residents.</p> <p>Possible reputational damage for GM and the devolution agenda if we are unable to meet residents' requests for provision that is not covered by current commissioning or are unable to support providers during transition to devolved arrangements.</p>		<p>Market engagement/consultation informed our procurement approach in order to ensure sufficient coverage and the right mix of provision. Small financial reserve is available to meet unmet demand in the even that gaps in provision emerge in-year.</p> <p>Commissioning complete, with contracts/funding agreements in place with all providers for 2019/20. Performance monitoring/assurance arrangements are established within those contracts.</p> <p>Arrangements established with Liverpool City Region. Criteria/process established for dealing with individual requests from learners where needs cannot be met within existing provision.</p> <p>Performance &amp; Contracts team and internal audit closely involved in development of both provider-facing systems and internal processes via the Project Steering Group and a specific</p>				<p>On-programme audit &amp; assurance activity underway via provider visits to establish RAG ratings/level of rigour required for each organisation.</p>

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Anticipated Risk March 2020	Current Risk Score (IxL)	Previous Risk Score	Key Actions and Deadlines and Audit Activity
						<p>audit/assurance working group to provide oversight.</p> <p>Dedicated finance post established to ensure close links between programme management and finance functions while maintaining appropriate separation.</p> <p>Refresh of Single Pot Assurance Framework guidance includes a specific annex dealing with AEB assurance.</p> <p>Relationship managers and contract management staff now in post.</p> <p>Work shadowing arrangements have been made for GM staff to observe ESFA assurance monitoring visits to providers – first visit took place in Sept.</p> <p>CA has approved retention of management fee (equivalent to 1.6%) from GM’s AEB funds to resource management, systems and assurance activity.</p>				

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Anticipated Risk March 2020	Current Risk Score (IxL)	Previous Risk Score	Key Actions and Deadlines and Audit Activity
16	Dec 2017	GM Strategy, GM Priorities and Strategic Initiatives.	<p><b>GM Waste:</b> Operation of new service contracts do not deliver intended outcomes.</p> <p>Delays to construction of new facilities may delay delivery of targets.</p> <p>National Waste and Resources Strategy results in change to collection or disposal requirements.</p>	<p>Contracting arrangements do not deliver value for money which could impact on finances and the achievement of expected outcomes.</p> <p>Services may be more costly than forecast due to global recyclable market restrictions which could impact on finances.</p> <p>Additional collection costs and/or claims from disposal contractor for changes in waste flows or composition due to imposed requirements of National Strategy.</p>	<p>Chief Executive: Eamonn Boylan</p> <p>Executive Director, Waste and Resources: David Taylor</p>	<p>Programme in place for transfer of knowledge from advisory team to core Waste team.</p> <p>Core GMWDA team transferred to GMCA provides continuity and knowledge transfer. Additional contract management resources being recruited, to be in place prior to contract commencement on 1<sup>st</sup> June 2019.</p> <p>Oversight of progress by Waste Committee.</p> <p>Tracking of global commodity prices to give transparency, 2 year communications and engagement plan with focus on contamination and improve quality of recyclables collected.</p> <p>Ongoing active planning for transition of contracts during 2018/19.</p> <p>Joint group with WCAs to develop responses to consultation documents.</p>	Medium	Medium 4x3=12	Medium	<p>Internal Audit review of new GM Waste Contract to be completed in 2019.</p> <p>Weekly mobilisation meeting to review plan, joint action log and risk register developed with preferred tenderer.</p> <p>Joint consultation responses and business case analysis for potential collection changes</p>

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Anticipated Risk March 2020	Current Risk Score (IxL)	Previous Risk Score	Key Actions and Deadlines and Audit Activity
17	Dec 2017	GM Strategy, GM Priorities and Strategic Initiatives  <b>(Police and Crime Plan)</b>	<b>ICT Implementation:</b>  iOps fails to deliver the intended benefits to GMP.  iOps adversely impacts operational performance and/or capability.	Potential impact on the ability to realise the forecast efficiency and outcome benefits of IOPS due to ongoing reliance on legacy systems.  Costs associated with development and implementation increase above planned budget.  Adverse impact on operational performance.	Deputy Chief Executive: Andrew Lightfoot  Director Policing, Crime, Criminal Justice and Fire: Clare Monaghan	Controls and assurance arrangements within GM Police (and outside the scope of this risk register).  Oversight by Deputy Mayor (Police and Crime), Executive Group and Police Audit Panel	Medium	Medium  4x3=12	Medium	Police and Crime Internal Audit Service Plan 2018/19 to consider assurance over aspects of this risk. Assurances from GMP to Deputy Mayor and Police Audit Panel.  GMP working with their strategic delivery partner and providers to put in place a robust plan for future drops to address current issues and continue the “hypercare phase” of the implementation.
18	Dec 2017	GM Strategy, GM Priorities and Strategic Initiatives	<b>GM Spatial Framework (GMSF):</b> GMSF does not provide the statutory planning framework for GM’s growth	GM & Districts fail to meet Govt deadline for plans to be in place.	Chief Executive: Eamonn Boylan	1. <b>Draft GMSF published in January</b> and consulted on. Results of consultation currently being analysed.	Medium	Medium  3x3=9	Medium	Clear plan for timeline and next stages of the GMSF will be agreed by the Combined Authority in September, including a

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Anticipated Risk March 2020	Current Risk Score (IxL)	Previous Risk Score	Key Actions and Deadlines and Audit Activity
			ambitions, jeopardising delivery of housing, employment, and infrastructure and compromising effectiveness of local plan processes.	<p>Unable to challenge Planning Applications as cannot demonstrate 5 year supply.</p> <p>Unable to build level of housing needed, especially on brownfield land, to support growth.</p>		<p>2. <b>Effective communication, engagement and consultation processes</b> in place for remaining stages of plan process.</p> <p>3. <b>Regular meetings</b> with Directors of Place, Wider Leadership Team and regular reports to Leaders.</p>				<p>focus on Town Centre living during Autumn/Winter 19/20</p> <p>Ongoing development of robust evidence base to test viability of sites and infrastructure required, jointly between Districts, GMCA and TfGM</p> <p><b>Ongoing discussions with Government</b> about status of GMSF as SDS or DPD and the levels of consultation/engagement required</p> <p><b>Active engagement</b> of Members, Leaders and MPs.</p>

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Anticipated Risk March 2020	Current Risk Score (IxL)	Previous Risk Score	Key Actions and Deadlines and Audit Activity
19	Dec 2018	GM Strategy, GM Priorities and Strategic Initiatives	<b>Government support for housing delivery :</b> Failure to secure enough Government support to ensure development on GM's brownfield land supply.	Unable to build the level of housing needed, especially on brownfield land to support growth.	Head of Housing Strategy: Steve Fyfe	Housing Deal now very unlikely to proceed in its current form. Detailed discussions underway with Homes England about joint/partnership working to replace the capacity & investment that would have come from the Housing Deal.	High	High 4x3=12	High	<p>Agreement with Homes England due to be reached in September about initial priorities for work to progress development on brownfield land at scale.</p> <p>Further evidence to Government, and work/funding still required to ensure development on brownfield land at the scale required. to ensure GM has a viable 5 year land supply.</p> <p>Some parts of GM to potentially benefit from High Street Fund and Stronger Towns Fund</p>

**Appendix B: The Risk Continuum: Risk Scoring Guidelines**

Risk Impact and Likelihood scores are attributed from within a sliding scale. Definitional statements are described in broad terms and there is a requirement to consider each risk within the continuum and apply specialist understanding or experience.

Score	Impact	Likelihood
5	<p>Life threatening / multiple serious injuries.</p> <p>Major impact on one or more GMS priorities or severe impact on Priority 1 (critical services) performance.</p> <p>Intense political and media scrutiny i.e. national media coverage / prolonged local media coverage.</p> <p>Possible legislative, criminal, or high profile civil action against the GMCA, GM Mayor members or officers.</p> <p>Cessation of core activities and / or failure of major projects/programmes.</p> <p>Finance impacts that cannot be managed from within Departmental financial resources.</p> <p>Statutory intervention triggered.</p> <p>Impact on the whole GMCA.</p>	<p>High likely that risk will be realised (60%)</p>
3	<p>Threat to the health and wellbeing of one or more individuals. Potential for workdays lost to injury/stress</p> <p>Additional scrutiny required by management and internal committees.</p> <p>Service impacts require coordinated directorate response.</p> <p>Some local media attention requiring corporate intervention.</p> <p>Failure of projects with departmental impact and/or core activities in delivering the GMS continue to be delivered but reasonable adjustment required to focus resources at priority areas</p> <p>Budgetary realignment required to manage impacts.</p>	<p>Medium/Low likelihood (circa 30%)</p>
1	<p>Injuries / stress requiring only limited medical intervention.</p> <p>Limited additional scrutiny required by management and / or risk unlikely to receive local media coverage.</p> <p>Short-term disruption of activities / service performance.</p> <p>Internal policies and regulations not complied with.</p> <p>Finance impacts managed with minimal impact.</p>	<p>Whilst possible the likelihood of the risk being realised is considered low (&lt;5%)</p>