

GMCA Audit Committee

Date: 21 January 2020

Subject: GMCA Corporate Risk Register – January Update

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

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 January 2020.

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:

Steve Wilson, Treasurer to GMCA,
Steve.wilson@greatermanchester-ca.gov.uk

Sarah Horseman, Head of Audit and Assurance - GMCA,
sarah.horseman@greatermanchester-ca.gov.uk

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

TRACKING/PROCESS		
Does this report relate to a major strategic decision, as set out in the GMCA Constitution		No
EXEMPTION FROM CALL IN		
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 CRR 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 January 2020 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 third quarterly review for 2019/20 and includes updates to risk descriptions, risk status and key controls and actions. The format of the risk register has also been amended as requested by the Audit Committee in October 2019. Columns have been re-ordered and a trend indicator has been included.
 - 2.3 The Head of Audit and Assurance has 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.
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3 Corporate Risk Register (CRR) January 2020 Update

- 3.1 The third quarterly update of the CRR for 2019/20 shows 20 risks recorded in the register.
- 3.2 There were no major changes to the GMCA risk landscape with only some minor changes to risk scores and actions. The number of high risks recorded reduced from three to two, with one new risk added to the register and one risk reinstated 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 was reduced from high to medium in the short term, but reflects the continued uncertainty over the UK's relationship with the EU and operating environment. This risk will continue being monitored separately as part of the GMCA and GM BREXIT Readiness Group and captured on a BREXIT readiness action plan.
 - **R2 Independent reviews;** the risk description was amended to reflect the potential risk of not completing the independent review in line with the agreed scope.
 - **R10 Information Security;** risk remained high and reflected the risk level on the national cyber security register. Several planned actions in this area have been completed, but resourcing to a critical post remains a risk to ongoing development work.
 - **R12 Information Governance;** risk was increased from medium to high to reflect the stage of progress toward GDPR compliance.
 - **R19 Government Support for Housing Delivery;** was still reduced from high to medium to reflect the progress made with Homes England.
- 3.5 One new risk was added to the register; **R20 Climate Change** and the risk describes a failure to deliver on GM climate change initiatives within the required timescales and achievement of GM's long term carbon reduction targets. This risk was deemed a medium risk for the organisation and further assurance will be sought over action plans during the year.
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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	2	4	
People		1	
Statutory and Compliance			
Devolution and Powers		2	
GM Strategy, GM Priorities and Strategic Initiatives		7	
Total	2	17	1
<i>Proposed for Removal</i>	<i>0</i>	<i>0</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 January 2020

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Previous Risk Score	Current Risk Score (IxL)	Anticipated Risk March 2020	Key Actions and Deadlines and Audit Activity
1	Aug 2016	Environment and Context	<p>Brexit: 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. Monthly Brexit Monitor update report to track developments and support GMCA decision making.</p> <p>2. Ongoing Mayoral, Leaders and Chief Officer engagement with Government Departments.</p> <p>3. Brexit Monitor is a standing agenda item on Economy, Business Growth & Skills Overview & Scrutiny Committee.</p> <p>4. Ensure GM involvement in UKSPF design (the replacement for EU structural funds).</p> <p>5. GMCA and GM Brexit Readiness Group established and meeting regularly. Potential risks to GM and GMCA being examined and captured on a Readiness Action Plan. All LAs have now appointed a BREXIT Liaison Officer (BLO) who have joined the GM Readiness Group</p> <p>6. Engagement of Chief Resilience Officer in appropriate Civil Contingency planning via Local Resilience Forum.</p>	High	<p>Medium</p> <p>Risk Score: 4x2=8</p> 	Medium	<p>Risk likelihood of a no deal BREXIT in January 2020 now substantially reduced in the short term. Government aiming for a trade deal with EU by Dec 2020.</p> <p>Joint work between GM Readiness Group, LRF and Economic Resilience Taskforce will continue over the coming months, ensuring District BLOs are fully engaged and appropriate preparation made for any emerging issues.</p> <p>Economic Resilience Taskforce developing and testing appropriate responses for any economic shocks that may occur</p>

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						<p>7. Risk also captured on Fire Risk Register.</p> <p>8. Economic Resilience Taskforce set up between key partners to track economic trends and take early action to support businesses and individuals affected</p> <p>9. Co-ordination between LRF and GM BREXIT Group agreed</p>				

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2	Dec 2017	Governance and Organisation	Independent Review into Child Sexual Exploitation is not completed in line with terms of reference.	Negative impact on public confidence in GM's ability to respond adequately to child sexual exploitation.	GM Mayor and Deputy Mayor (Policing and Crime) Chief Executive: Eamonn Boylan	Oversight and reporting to GM Mayor and Deputy Mayors, GMCA, Scrutiny Committees and Police and Crime Panel. Engagement through Deputy Chief Executive, lead Chief Executive for Children and Chief Constable to build support across GM to complete part three of the review to provide assurance on current practice.	Medium	Medium Risk Score: 4x3=12 	Medium	CSE – the Police and crime plan 2018-21 includes specific focus on implementation of recommendations from the CSE review.

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3	Dec 2018	Devolution and Powers	<p>Devolution: 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>	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.	Chief Executive: Eamonn Boylan	<p>On-going monitoring of current Devolution Deals, partly via the GMS 6 monthly monitoring.</p> <p>Local Industrial Strategy agreed with Government and published although it does not give complete clarity re national devolution work programmes.</p> <p>GM will input into the forthcoming Budget and SR2020.</p> <p>Ongoing input into Government departments on key areas of policy – such as GMSF/town centre development</p>	Medium	<p>Medium</p> <p>Risk Score: 3x3=9</p> 	Medium	Risk needs to be kept under review as new Government policy evolves, and in the light of BREXIT. Initial positive comments from new Government about powers and resources for the North. Essential that these are followed through.
4	Dec 2017	Devolution and Powers	<p>Bus Reform: Approval and successful Implementation of bus reform deriving from the Bus Services Act 2017 is threatened by financial / resource capacity, and legal challenges alleging failure to comply with legislative and or public/administrative law requirements.</p>	Impact on services to the public and delay to bus reform from legal challenge.	Chief Executive: Eamonn Boylan	<p>1. Ongoing senior level officer and political engagement with Government.</p> <p>2. Bus reform project being managed through 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	<p>Medium</p> <p>Risk Score: 3x3=9</p> 	Medium	<p>Order came into force on 4 April 2019.</p> <p>Continuous engagement with MHCLG.</p>

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			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> <p>11. The publication of the assessment and the audit of the assessment was approved by the GMCA on 07.10.2019</p> <p>12. GMCA also agreed to undertake a consultation in accordance with section 123E of the Transport Act 2000, commencing on 14 October 2019 and ending on 8 January 2020, and agreed the funding for the consultation</p>				

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5	Dec 2017	People	Staffing Capacity: 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. Strategic Performance Framework and dashboard designed and in use.</p> <p>2. The business planning process is being more closely aligned to the Personal Objective setting process.</p> <p>3. The SIP programme 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. GMS and implementation plan 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 GMFRS service Programme for Change (Pfc).</p> <p>6 Digital Strategy supports new ways of working and focuses on increasing capacity.</p> <p>8. GMCA OD strategy has been implemented.</p>	Medium	<p>Medium</p> <p>Risk Score: 4x2=8</p> 	Medium	<p>Business planning activity to be completed by end April 2019 Completed with revised timetable.</p> <p>Objective setting to be completed by 30th June 2019. Partially completed.</p> <p>Completion of service reviews underway and progressing. Progress has been re-prioritised based on risk and implementation of PFC. Expected completion has slipped to early 2020. On track with revised timetable.</p> <p>Accelerated recruitment process for Organisational Critical roles maintained throughout the HR and OD review. Action – to identify and map all statutory and business critical roles. – CA</p>

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										<p>Succession planning exercise to be scheduled for Q4</p> <p>GMFRS Business Critical Roles considered as part of PFC. Accelerated recruitment maintained in the meantime.</p> <p>Bid included in 2019/20 budget for further internal investment in ICT approved. – Ongoing in pipeline for ICT delivery.</p> <p>GMFRS Pfc 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</p>

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										risk. – On track and ongoing. Programme risk reviewed at PFC programme board and steering Group.

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6	Dec 2017	Finance and Resources	<p>Use of funding: 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: Steve Wilson	<ol style="list-style-type: none"> Revised GMS and Implementation Plan led by GM Mayor, Chief Executive and Senior Management Team Revised governance structure set out in the constitution Oversight at GMCA, Wider Leadership Team and Scrutiny Committees Lobbying of Government by Regional Leaders Annual budget setting and financial strategy process including retaining adequate reserves GMCA borrowing powers available to support capital investment if required 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. 	Medium	<p>Medium</p> <p>Risk Score: 4x3=12</p> 	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>Comprehensive Spending Review – 2019/20 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 CSR and the Fair Funding Review 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 new prosperity fund (post Brexit).</p>

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7	Dec 2017	Finance and Resources	<p>a) Capital Programme: 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) Programme Governance: 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 impact future funding awards</p>	Chief Executive: Eamonn Boylan	<p>1. Single Pot Assurance Framework updated in light of new national guidance and a review of GMCA current practices.</p> <p>2. Gateway processes for scheme appraisal and approvals.</p> <p>3. Reports to Chief Executive's Investment Group (CXIG) and GMCA Board on scheme progress and delivery of the Capital Programme.</p> <p>4. Mature TfGM governance arrangements 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>5. Oversight by Scrutiny Committee, TfGM Committee and sub committees.</p> <p>6. Performance monitoring framework linked to GMS and GMCA business plan.</p>	Medium	<p>Medium</p> <p>Risk Score: 3x3=9</p> 	Medium	<p>Clear bid management process 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>Considerable work has been undertaken since the LEP 'requires improvement' score on delivery. Far stronger joint working with TfGM to manage whole LGF programme in accordance with expectations from MHCLG. All actions in MHCLG action plan completed and significant improvement in contractual commitments</p>

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			<ul style="list-style-type: none"> • Evergreen • HILF • Work and Health • Local Growth Fund (LGF) • Skills & Employment 			<p>7. Agreement to have quarterly relationship management meetings with GMCA/Growth Company.</p> <p>8. Meeting held with Government to agree reporting on LGF to ensure consistency with other areas, and how different levels of spend/commitment will be viewed by Govt.</p> <p>9. Q2 LGF return completed to Government which showed a significant improvement in commitments (based on new agreed reporting definitions). This will be discussed with Government in the Annual Performance Review in January.</p>				<p>This should result in an improved 'score' for 19/20 via the APR process.</p> <p>Key issue for the future will be to keep an eye on the end of LGF programme arrangements (March 2021) to ensure actual spend and output commitments are met.</p> <p>GMCA Capital Programming and Treasury Management function 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>

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8	Dec 2017	Finance and Resources	Losses in excess of £60m from the 10 year £300m recyclable Housing Investment Loan Fund (HILF) have been underwritten by the GMCA. The GMCA is contracted to return a minimum of £240m to Treasury at the end of the Fund.	If net losses in excess of £60m are incurred, they will need to be funded by the GMCA.	Chief Executive: Eamonn Boylan Andrew McIntosh Investment Director	<ol style="list-style-type: none"> 1. Robust credit processes with two layers of credit approval. The Gateway panel (first stage approval) is made up of experienced private sector industry experts. 2. HILF S151 grant certification (annual) by Internal Audit has provided positive assurance. 3. GMCA Core Investment Team responsible for controlling HILF and oversight by Chief Executives' Investment Group. 	Low	Low Risk Score: 3x2=6 	Low	Audit Plan-Q4
9	Dec 2017	Governance and Organisation	Behaviours and Culture: 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. Inconsistency of approach could impact efficiency and the potential benefits that derive from integration and collaboration across the GMCA.	Deputy Chief Executive: Andrew Lightfoot	<ol style="list-style-type: none"> 1. OD strategy for GMCA as a whole and organisational orientation and induction. OD strategy approved and implemented. 2. Development of Extended Leadership Team and 'lunch and learn / meet the team' sessions to help raise awareness of work across teams. 3. Regular communications from GM Mayor and Chief Executive, including intranet content and all- 	Medium	Medium Risk Score: 3x3=9 	Medium	<p>Completion of service reviews in line with agreed plan and timescales. On track with revised timescales.</p> <p>"We are GMCA" sessions available to all staff – immediate and ongoing– ongoing and schedules for 2020. SMT to attend.</p> <p>Away Day planned with EMT. ELT</p>

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				Culture inertia could result in an inability to retain staff, increase employee relation caseload, and increase pressures on recruitment.		<p>staff sessions to engage on vision on strategy.</p> <p>5. Accelerated People Review (with authority to reallocate resources) is ongoing.</p> <p>6. Staff engagement survey issued in Q3.</p> <p>7. PFC has a separate workstream looking at culture of the GMFRS.</p>				<p>restructured and supported with External facilitation – ongoing. Follow up sessions planned throughout Q4</p> <p>Deliver personal appraisals within the new model. Ongoing - at 61.95% in Nov 19.</p> <p>Staff Engagement survey action planning to be introduced from Jan 20. Consider strategies to ensure that cultural development is pursued at all levels. On track- results to be shared with SLT 20/01/20.</p>

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10	Dec 2017	Governance and Organisation	Information security: 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	<p>1. Governance created to support the strategic direction of ICT/Digital and, separately, IG to improve cyber security.</p> <p>2. Majority of ICT infrastructure is based on mature GMFRS network, systems and applications. 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.</p> <p>3. Investment in tools to scan the infrastructure to ensure that vulnerabilities are identified and addressed.</p> <p>4. Support provided through training online (LMS) and information on the GMCA intranet. Training on information security tracked through SMT.</p>	High	<p>High</p> <p>Risk Score: 4x4=16</p> 	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>Work towards government standard security across GMCA ICT networks. PEN test completed in July 2019. Currently pursuing achievement of Cyber Essentials plus status – deadline Dec 2019. Dec 2019 update – deadline extended awaiting recruitment to ICT Security Manager post.</p> <p>Dec 2019 update - Completion of ICT business continuity plan in progress but dependent on the quality of Business BC planning. Intend draft ICT BC Plan by end Jan 2020.</p>

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						<p>5. Security Incident processes 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>Security Incident processes being developed to ensure a rapid response to cyber incidents. COMPLETED</p> <p>Procedures documented, tested and used. – These are to be reviewed and refreshed. This is currently under review.</p> <p>Continue efforts to recruit ICT Security Manager Job re-sized to reflect market rates and position re-advertised in April 2019 & Sept 19 - Unsuccessful. Dec 2019 update - Recruitment in Sept 2019 failed to attract a suitable candidate. Salary does not compete with market rates. Re-advertising the role in Jan 2020.</p>

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										<p>Working with partner organisations, senior management and HR to look at other options should recruitment fail.</p> <p>WAN/LAN upgrade and managed service – Mar 2019. COMPLETED</p> <p>Consideration of cyber security Insurance and threat monitoring. Enhanced threat monitoring now in place. COMPLETED</p>
11	Oct19	Governance and Organisation	<p>Business Continuity and Contingency Planning</p> <p>There is an inadequate organisational wide BC plan to respond to a major incident or lower level disruption to service.</p>	<ul style="list-style-type: none"> Lack of a coordinated and focussed response. Could result in Major service disruption. Potential loss of key business systems / data. Staff welfare Reputational damage 	Assistant Director Governance and Scrutiny: Julie Connor	<ol style="list-style-type: none"> Specific Fire and Rescue Service BC Plan including GMCA Churchgate in place in 2017. Multi- agency emergency response through GM Resilience Forum. ICT business continuity plans to cope with untoward incidents. Key applications identified and managed. Initial assessment of priority assigned. Information Asset 	N/A	<p>Medium</p> <p>Risk Score: 4x3=12</p> 	Medium	<p>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. Work is ongoing, requires refresh early 2020.</p> <p>Waste and Recycling BC Plans being reviewed - Ongoing</p>

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				<ul style="list-style-type: none"> Potential non-compliance with CCA legislation. 		Owners identified at Leadership level.				
12	Dec 2017	Governance and Organisation	<p>Information Governance: Arrangements are insufficiently 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>	<p>There is an inability to demonstrate GDPR compliance and ensure effective information management and governance arrangements could result in:</p> <ul style="list-style-type: none"> Breaches of legislation Judicial review Litigation Claims Reduced transparency and visibility of information and data Reputational damage arising from breaches Loss of public Trust Inability to secure data sharing 	<p>GMCA Treasurer: Steve Wilson (as SIRO)</p> <p>GMCA Monitoring Officer: Liz Treacy</p> <p>Phillipa Nazari Assistant Director IG and DPO</p>	<p>GDPR Work programme and IG implementation led by the Assistant Director of Information Governance and Data Protection Officer. Programme has been developed to address priority areas.</p> <p>Data Protection Policy been through governance and ready for adoption.</p> <p>Project Manager appointed (August 2018).</p> <p>Training modules for staff launched. Training completion is being monitored.</p> <p>Data Breach Panel established. Information Governance Board established for the organisation.</p> <p>Review and alignment of IG processes underway and formation of IG function is ongoing.</p>	Medium	<p>High</p> <p>4x4=16</p> 	High	<p>Governance and Risk Group reviewed this risk in Jan and agreed to increase the risk status to High to reflect the stage of progress in ability to demonstrate GDPR compliance.</p> <p>MIIA report – Information Governance and best practice (Jan20)</p> <p>Develop effective mechanism for review and endorsement of IG and related policies. COMPLETE</p> <p>IG implementation Programme <i>drafting policies</i> with oversight from IG board members agreement</p>

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				<p>agreements with partners / Government.</p> <ul style="list-style-type: none"> • Detrimental impact on GM wide programmes of work 		<p>Policy Working Group set up to review c30 policies to comply with GDPR.</p>				<p>by trade unions and sign off by SMT. COMPLETE</p> <p>Engage with Trade Unions where required. COMPLETE</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>Tender for and procure necessary IG software (funding approved) IG Team members being trained on existing software to undertake information audits. Further software being considered to support security.</p>

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										<p>Centralised IG Team being restructured to ensure resilience and continuous support to the organisation.</p> <p>Procure and develop new engaging training modules to support the organisation.</p>
13	Sept 2018	Governance and Organisation	<p>Procurement, Commissioning and Contract Management: Three elements to this risk</p> <p>a) Contract Governance arrangements are insufficiently developed to provide a consistent organisation approach.</p> <p>b) Grant management arrangements are insufficiently</p>	<p>Lack of strategic oversight over commissioned activity.</p> <p>Resourcing, capability and capacity for effective commissioning and contract management remains a challenge.</p> <p>Policy, systems and processes are insufficiently developed to</p>	GMCA Treasurer: Steve Wilson	<ol style="list-style-type: none"> Utilising procurement and commissioning expertise from Fire and Rescue and partner organisations including TfGM, STaR and external. GMCA Constitution and Procurement Rules. Existing GMCA policies, procedures and codes of conduct. SIP Contracts and Procurement Review now underway including a review of grant management funding within projects. Contract Register being populated to ensure oversight of all procurement and commissioning related 	Medium	<p>Medium</p> <p>Risk Score: 4x3=12</p> 	Medium	<p>SIP Contracts and Procurement Review now underway including a review of grant management.</p> <p>Contract Register being populated to ensure oversight of all procurement and commissioning related activity, and to determine</p> <p>Procurement Forward Plan. Resources from AGMA Hub and Star used to supplement GMCA resources.</p>

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			<p>resourced post grant award, with lack of clarity about who is managing ongoing adherence to grant conditions with third parties.</p> <p>c) Difficulties in managing the complexity of grant funding streams across organisations and within individual projects.</p>	<p>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>activity, and to determine Procurement Forward Plan. Resources from AGMA Hub and Star used to supplement GMCA resources.</p> <p>5. Contract management arrangements being reviewed. Critical friend review underway.</p>				<p>Bid Management template 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 Management of overall LGF programme now significantly improved following appointment of new post. See Risk 7 above for details.</p>
14	Dec 2017	GM Strategy, GM Priorities and Strategic Initiatives	<p>External facing Digital Strategy: 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</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</p>	Chief Information Officer: Phil Swan	<p>CIO and AD for Creative & Digital Policy & 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>	Medium	<p>Medium</p> <p>Risk Score: 3x4=12</p> 	Medium	Risks to Unified Architecture 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.

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			<p>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, realisation and benefits by local authorities and GMCA.</p>	<p>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>		<p>GM Digital Steering Group providing support, guidance input and review for updated of GM Digital Strategy</p> <p>Reform Board oversight of Early Years digitisation planning and programmes.</p> <p>Unified Architecture Programme Board chaired by Andrew Lightfoot, Dep CEO of GMCA.</p> <p>Full Fibre Programme Board and related Digital Infrastructure Advisory Board.</p> <p>Governance arrangements across H&SCP and GMCA activity on the architecture- quarterly meetings to ensure alignment of programmes and design of GM wide architecture.</p>				<p>Full Fibre 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> <p>The refresh of the GM Digital Strategy 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>

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										<ul style="list-style-type: none"> SIP proposal has been presented (May 19)- move to implementation phase <p>Planned Internal Audit review of ICT Strategy, Governance and Programme Management to be completed in Q1 2019.</p>
15	April 2018	GM Strategy, GM Priorities and Strategic Initiatives	<p>Adult Education Budget devolution provides GMCA with a range of statutory obligations. 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</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</p>	Assistant Director: Gemma Marsh	<p>MoU with DfE (Dec 2018) 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</p>	Medium	<p>Medium</p> <p>Risk Score: 4x3=12</p> 	Low	<p>Discussions ongoing with DfE/ESFA around scope for joint audit code of practice 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</p>

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Previous Risk Score	Current Risk Score (1xL)	Anticipated Risk March 2020	Key Actions and Deadlines and Audit Activity
			<p>entitled to free learning outstrips resources. No in-year funding for growth will be available from Government.</p> <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-</p>	<p>skills programmes for GM residents, including legal entitlements, until such time as additional funding is available.</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</p>		<p>obligations as statutory entitlements are not timebound. Proactive in-year performance management systems will enable GMCA to respond to under/over delivery requests.</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>authorities to purchase additional audit activity from the ESFA's framework of procured audit firms to should we wish to do so.</p> <p>Audit and assurance activity is underway via internal audit review of payments made in 2019/20 and provider visits to establish RAG ratings/level of rigour required for each organisation.</p>

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			demand courses that are not currently available from the commissioned provision.	commissioning or are unable to support providers during transition to devolved arrangements.		<p>Performance & 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 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>				

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						CA has approved retention of management fee (equivalent to 1.6%) from GM's AEB funds to resource management, systems and assurance activity.				
16	Dec 2017	GM Strategy, GM Priorities and Strategic Initiatives.	<p>GM Waste: Contractor fails to perform as required by the Contract.</p> <p>Construction of new facilities are delayed.</p> <p>Recyclable materials value reduce as a result of global commodity trends or the quality of the material collected is not high enough</p> <p>National Waste and Resources Strategy results in change to collection, treatment or disposal requirements</p>	<p>The Contracts do not achieve intended financial, service, social and environmental outcomes</p> <p>The value of recyclate collected drops resulting in increased costs or the requirement to manage materials in a less environmentally favourable manner</p> <p>Additional collection costs and/or claims from disposal contractor for changes in waste flows or</p>	<p>Chief Executive: Eamonn Boylan</p> <p>Executive Director, Waste and Resources: David Taylor</p>	<p>Robust performance management framework in place to incentivise performance.</p> <p>Transfer of knowledge from advisory team to core Waste team. Experienced contract management team in place utilising existing contract management systems.</p> <p>Core GMWDA team transferred to GMCA provides continuity and knowledge transfer. Additional contract management resources being recruited.</p> <p>Management of progress through project planning and contractor liaison. Operational risk register in place. Oversight by Waste Committee.</p>	Medium	<p>Medium</p> <p>Risk Score: 4x3=12</p> 	Medium	<p>Internal Audit review of new GM Waste Contract to be completed in early 2020.</p> <p>Delivery of tested Contract Manual by April 2020.</p> <p>Weekly mobilisation meeting to review plan, joint action log and risk register (will fall away in time).</p> <p>Monthly formal Contract management Meetings with the contractor.</p> <p>Regular review of operational risk register.</p>

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				composition; potential redundancy of facilities and/or procurement of new contracts due to imposed requirements of National Strategy.		<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>Joint group with WCAs to develop responses to consultation documents.</p>				Joint consultation responses and change impact studies commissioned where appropriate using internal and external funding

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Previous Risk Score	Current Risk Score (IxL)	Anticipated Risk March 2020	Key Actions and Deadlines and Audit Activity
17	Dec 2017	GM Strategy, GM Priorities and Strategic (Police and Crime Plan)	iOps Implementation: Failure to realise the benefits of the full IOPS Policing IT system.	<p>Potential impact on the ability to realise the forecast efficiency and outcome benefits of IOPS due to ongoing reliance on legacy systems.</p> <p>Costs associated with development and implementation increase above planned budget.</p> <p>Loss of confidence within GMP, partnerships and amongst the public in the efficacy of the new system.</p>	<p>Deputy Chief Executive: Andrew Lightfoot</p> <p>Director Policing, Crime, Criminal Justice and Fire: Clare Monaghan</p>	<p>Controls and assurance arrangements within GM Police (and outside the scope of this risk register).</p> <p>Oversight by Deputy Mayor (Police and Crime), Executive Group and Police Audit Panel.</p>	Medium	<p>Medium</p> <p>Risk Score: 4x3=12</p> 	Medium	<p>HMICFRS review of iOps undertaken in later 2019.</p> <p>GMP working with their strategic delivery partner and providers to remedy faults within the system and as the system moves out of the “hypercare” phase to build confidence in the ability of the system to deliver.</p>
18	Dec 2017	GM Strategy, GM Priorities and Strategic Initiatives	GM Spatial Framework (GMSF): GMSF does not provide the statutory planning framework for GM’s growth ambitions,	Viability issues of brownfield land could result in inability to build level of housing needed, especially on brownfield land	Chief Executive: Eamonn Boylan	<p>1. Draft GMSF published in January and consulted on. Results of consultation released.</p> <p>2. Effective communication, engagement and</p>	Medium	<p>Medium</p> <p>Risk Score: 3x3=9</p> 	Medium	Clear plan for timeline and next stages of the GMSF was agreed by the Combined Authority in September 2019, including a focus on

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Previous Risk Score	Current Risk Score (1xL)	Anticipated Risk March 2020	Key Actions and Deadlines and Audit Activity
			jeopardising delivery of housing, employment, and infrastructure and compromising effectiveness of local plan processes. Proposed Government review of the planning system causes further uncertainty and delay. Delay to consultation would represent significant risk to GMSF continuing.	and in town centres, to support growth. Unable to control location of development as cannot demonstrate 5 year supply. Impact upon ability of districts to progress detailed local plans. Mayor has a duty to prepare a Spatial Development Strategy. If GMSF not progressed, districts would need to prepare district local plans and agree distribution of development through individual Duty to co-operate arrangements		consultation processes in place for remaining stages of plan process. 3. Regular meetings with Directors of Place, Wider Leadership Team and regular reports to Leaders.				Town Centre living during Autumn/Winter 19/20 Ongoing development of robust evidence base to test viability of sites and infrastructure required, jointly between Districts, GMCA and TfGM Ongoing discussions with Government about status of GMSF as SDS or DPD and the levels of consultation/engagement required Active engagement of Members, Leaders and MPs. Development of GM Infrastructure Programme, on back of Local Industrial Strategy, to look at infrastructure required

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Previous Risk Score	Current Risk Score (1xL)	Anticipated Risk March 2020	Key Actions and Deadlines and Audit Activity
										to deliver housing and sites.
19	Dec 2018	GM Strategy, GM Priorities and Strategic Initiatives	Government support for housing delivery : 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. Draft joint action plan prepared with Homes England input for senior level discussion in January 2020.	High	Medium Risk Score: 4x3=12 	Medium	Governance and Risk Group reviewed this in Jan and agreed to reduce the risk score to Medium to reflect the progress made with Homes England. Agreement with Homes England on initial priorities to be formalised in joint action plan. Further case-making to Government on work/funding still required to ensure development on brownfield land at the scale required to ensure GM has a viable 5 year land supply, drawing on GMSF viability studies. Some parts of GM to potentially benefit from High Street Fund

Ref	Date	Theme	Risk Description	Risk Consequences	Risk Owner	Existing Key Controls and Sources of Assurance	Previous Risk Score	Current Risk Score (1xL)	Anticipated Risk March 2020	Key Actions and Deadlines and Audit Activity
										and Stronger Towns Fund

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20	Jan 20	GM Strategy, GM Priorities and Strategic Initiatives	NEW RISK Climate Change Failure to deliver on GM climate change initiatives within the required timescales with consequent impacts on achieving GM's long term carbon reduction targets.	<ol style="list-style-type: none"> 1. Long term climate change risks to population, business and infrastructure. 2. Systemic and complex nature of the issue results in delayed decision making & action. 3. Reputational damage to CA. 4. Risk of disruption from climate protests. 	Mark Atherton	<ol style="list-style-type: none"> 1. GM 5 Year Environment Plan (March19) – which includes immediate mitigation and adaptation measures and further innovation measures needed to meet the challenge. 2. Mission based approach being adopted to gain broad cross sectoral support and action. 3. Commitment of funding from Retained Business Rates to support initial delivery against the agenda and external funding opportunities to support substantial change initiatives. 4. Media activity and annual Green Summit to share progress, encourage change and demonstrate Mayoral commitment. 5. Engagement with activist groups to share progress and raise awareness of constraints. 	N/A	Medium Risk Score: 4x3=12	Medium	<p>Mission based approach - Challenge Groups and T&F groups initiated – responsible for reviewing/'owning' the scale of the challenge and ensuring appropriate joined up actions by all partners</p> <p>Bids submitted for external funding to deliver programmes at scale and development of innovative policy and finance mechanisms.</p> <p>Progress towards targets regularly reviewed through Green City Region Partnership</p> <p>6 monthly update on GMCA actions in response to its declared Climate Emergency to be reported to CA</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>	High likely that risk will be realised (60%)
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>	Medium/Low likelihood (circa 30%)
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>	Whilst possible the likelihood of the risk being realised is considered low (<5%)