

Version Date: August 2013

		Deta	ills of Risk			lnh	erent Risk	(		Resi	idual l	Risk	Actions			
Risk No.	Service Committee	Risk Description	Trigger	Result	Probability	Impact	Ow	wner	Key Controls	Probability	Impact	Description	Action Owner	Target Date	Revised Target Date	Action Status
CRR9	Economy and Environment Highways and Community Infrastructure	infrastructure	Insufficient funding is obtained from a variety of sources, including government funds, section 106 payments, community infrastructure levy and other planning contributions, to deliver required infrastructure. This is exacerbated by the recession and reduced government funding for local authorities	Key infrastructure, services and developments cannot be delivered, with consequent impacts on transport, economic, environmental, and social outcomes. This could also result in greater borrowing requirement to deliver essential infrastructure and services which is unsustainable.					1. Maximisation of developer contributions through Section 106 negotiations. 2. Prudential borrowing strategy is in place. 3. Section 106 deferrals policy is in place. 4. External funding for infrastructure and services is continually sought. 5. Implementation of Community Infrastructure Levy (CIL). 6. Strategic development sites dealt with through S106 rather than CIL and S106. 7. Local plan policies with District Councils. 8. Planning Obligation document in place for Districts and CCC use. 9. Lobbying with Local Government Association			Assist Cambridge City Council and South Cambridgeshire District Council in implementing the Community Infrastructure Levy (CIL) regime and setting charges      Assist Hunts District Council in implementing the Community Infrastructure Levy regime.	Head of Transport and Infrastructure, Policy and Funding Head of Transport and Infrastructure, Policy and Funding	Early 2015 Early 2015		G
												Assist East Cambs District     Council in implementing the CIL regime.	Head of Transport and Infrastructure, Policy and Funding	Ongoing		G
					4	4 1	6			3	4	A. Assist Fenland District Council in implementing the CIL regime and setting charges	Head of Transport and Infrastructure, Policy and Funding	Yet to commence Summer 2014		A
												5. Investigate the potential for use of Tax Increment Financing and other innovative forms of funding.	Executive Director, ETE	Ongoing		G
												Respond to District Council     Local Plans to address     infrastructure policy deficit at all     stages of the Local Plan process.	Head of Growth and Economy	Ongoing		G
												7. Assist service areas define their infrastructure requirements to be pulled together within one policy document for use	Head of Transport and Infrastructure, Policy and Funding	End 2014		G
												Scope out potential for a more joined up approach to CIL and investment in infrastructure	Head of Transport and Infrastructure, Policy and Funding	End 2014		G
CRR22	Economy and Environment	Transport (CFT) programme fails to meet its objectives	Cambridgeshire Future Transport fails to deliver effective, efficient and responsive passenger transport services around Cambridgeshire	The accessibility needs of Cambridgeshire residents are not met, contributing to social exclusion, poor take up of employment and education			Strate		A Governance group is in place to oversee the programme. The group includes member representation from each of the districts, the county, NHS and Cambridgeshire ACRE.     There is a CFT Programme Board made up of representatives from Children's, Families and Adults (CFA) and Communications.			Engagement in areas H,I, J     H - St Ives, Ramsey, Whittlesey     I - St Neots, Brampton     J - Isleham, Fordham	Head of Passenger Transport	September- January 2015		G
				opportunities, and reduced quality of life.  A revised programme has been developed which means that the	4	5 2	0		<ol> <li>A strategic business case, risks and issues log and programme is in place.</li> <li>A communications strategy has been developed.</li> <li>An engagement strategy including stakeholder mapping has been developed.</li> <li>The project team meets on a bi-weekly basis.</li> <li>Updates are provided for Members via Key Issues.</li> </ol>	3	3	2. Identify suitable delivery models for areas E, F, G E - A14 Corridor F - A1 Corridor and A14 G - Harston, Great Shelford	Head of Passenger Transport	Jul-15		G
				project should be completed by the end of March 2015. Failure to complete on time will mean business plan savings are not achieved.					8. 3 year programme in place approved by Governance Group.			Engagement in areas K,L,M     K - Chatteris, March, Wisbech     L - Gorfield, Leverington     M - Melbourn, Bassingbourn	Head of Passenger Transport	February- April 2015		G
ETERR1 (Relates to CRR21)	Economy and Environment Highways and Community	Business Disruption	Loss of staff (large quantities or key staff)     Loss of premises (including temporary denial of access)     Loss of IT, equipment or data     Loss of a supplier	Inability to deliver consistent and continuous services to vulnerable people     School closures at critical times impacting students' ability to achieve					ETE functions have been reviewed and evaluated in terms of impact if not delivered over time.     ETE Business Continuity Plan (BCP) contains summary results of this process and facilitates prioritisation of functions in an emergency situation.     ETE BCP regularly reviewed and updated to ensure it contains accurate and current contact information.			ETE BCP Group is reviewing ETE functions in relation to BCP and currently completing Business Impact Analysis for critical services	Business Development & ETE	Oct-14		A
	Infrastructure		Loss of a supplier     Loss of utilities or fuel	3. Inability to fully meet legislative and statutory requirements 4. Increase in service demand (e.g. in pandemic)	4	4 1	6		euren condet momaton.	4	3	2. ETE BCP to be refreshed and approved by Management Team	Head of Policy and Business Development	Oct-14		A



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		Deta	ails of Risk			Inl	heren	nt Risk		Re	sidua	ıl Risk		Actions			
Risk No.	Service Committee	Risk Description	Trigger	Result	Probability	Impact	Score	Owner	Key Controls	Probability	Impact	Residual Score	Description	Action Owner	Target Date	Revised Target Date	Action Status
				Inability to respond to citizens' request for services or information     Lasting reputational damage									Heads of Service and reps to be trained following BCP refresh     Possible desktop exercise later in the year	Head of Policy and Business Development PBD/ETEMT	Dec-14 Mar-15		A
ETERR2 (Relates to CRR1a)	Economy and Environment Highways and Community Infrastructure	services over the five year	Failure to have clear political direction, vision, priorities, and outcomes in the Business Plan.     Failure to plan effectively to achieve necessary efficiency savings and service transformation.     Failure to identify sufficient additional savings in addition to existing plans, in light of forthcoming CSR.	ETE lacks clear direction for resource use and either overspends, requiring the need for reactive savings during the life of the plan, or spends limited resources unwisely, to the detriment of local communities.	5	5	25		1. Robust political leadership, strong vision, clear priorities and policies, developed through Councillor engagement 2. Robust engagement with members of Corporate Leadership Team (CLT) and Councillors through the Business Planning process timetable, to ensure greater cross-organisational challenge and development of options. 3. Full consultation with public, partners and businesses during planning process, including thorough use of data research and business intelligence to inform the planning process 4. Early engagement with CLT, Heads of Service and Councillors to generate further ideas for innovation, transformation and savings. 5. Stronger links with service planning, seeking to transform large areas of spend.		4	12	1. Business Planning capital report to Service Committees  2. Business Planning revenue report to Service Committees  3. Community Impact Assessments produced for 2015/16 revenue proposals.  4. ETE performance indicators to be developed as part of business planning process.  5. Fees and charges schedule being developed.  6. Complete tasks according to the Business Planning timetable	Executive Director, ETE  Executive Director, ETE  Head of Policy and Business Development  Head of Policy and Business Development  Head of Policy and Business Development  Head of Policy and Business Development	Sep-14 Oct-14 Oct-14 Oct-14 July - Dec 14		G G A
ETERR3 (CRR1b)	Economy and Environment Highways and Community Infrastructure	Failure to deliver the 2014/15 business plan	1. Failure to deliver (with partners) on 14/15 business plan and achieve required efficiency savings and service transformation.  2. Assumptions in existing business plan regarding the wider economic situation are inaccurate.  3. Organisation not sufficiently aligned to face challenges	targets; need for reactive in-year savings; adverse effect on delivery of outcomes for				Director, ETE	1. Robust service planning; priorities cascaded through management teams and through appraisal process 2. Strategy in place to communicate vision and plan throughout the organisation 3. A set of key indicators and targets for the whole Council is agreed each year through the Business Planning process. These are monitored and reported monthly to the Council's General Purposes Committee through the Integrated Resources and Performance Report. 4. ETE Performance Management Framework; key indicators and targets are reviewed annually following approval of the Business Plan. Performance management in ETE includes monitoring and reporting of performance against targets for key indicators through the ETE Finance and Performance Report. This is reported monthly to ETE Management Team and to the two Council Committees covering ETE activity. Additionally there is more detailed regular monitoring and reporting through performance reports to Directorate				, ,	Development  Head of Policy and Business Development  Head of Policy and Business Development	Oct-14		A

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		Deta	ills of Risk		<u> </u>	ln	nere	nt Risk		Res	idual	l Risk	Actions			ᅰ
Risk No.	Service Committee	Risk Description	Trigger	Result	Probability	Impact	Score	Owner	Key Controls	Probability	Impact	Residual Scoon	Action Owner	Target Date	Revised Target Date	Action Status
					5	5	25		5. Strengthened governance framework to manage transformation agenda, a. Integrated portfolio of programmes and projects, b. Routine portfolio review to identify and address dependencies, cross cutting opportunities and overlaps, c. Directorate Management Teams/Programme Governance Boards to ratify decisions 6. Rigorous risk management discipline embedded in all transformation programmes/projects, with escalation process 7. Integrated performance and resource reporting; a. Monthly progress against savings targets, b. Budget holders monthly meetings with LGSS Finance Partner/External Grants Team, producing BCR, c. Regular meetings with Director of Finance/s151 Officer, Committees and relevant Directors to track exceptions and identify remedial actions 8. Limited reserves for minor deviations 9. Routine monitoring of savings delivery to identify any required interventions 10. Financial monitoring enables budget pressures to be quickly identified 11. Regular meetings with Financial Advisers 12. Business Managers to identify efficiencies and act promptly. 13. Monitoring of income against targets to ETE Management Team and Directorate Management Teams.	2	4	8				
ETERR8	Economy and Environment Highways and Community Infrastructure	Failure to manage ETE Information Systems		Inaccurate, incomplete and out-of- date information held on systems and inefficient processes lead to errors. Potential to make errors relating to information held on IT Systems. Impact on service delivery.	4	4	16	Executive Director, ETE	Work with Information Governance to ensure that our systems meet the required data quality standards     Review licensing arrangements to ensure that software is used efficiently and is value for money     ETE Virtual IT Group set up and utilised     Portfolio management process to ensure duplication/proliferation of IT systems does	2	3	Virtual IT Group	Chair of ETE IT Group (Head of Local Infrastructure and Street Management)	Dec-14		G
ETERR9	Economy and Environment Highways and Community Infrastructure	Organisational Change - ETE	structure within ETE as a result of implementing business plan proposals.	Changes cause uncertainty for staff and adverse impact on - service delivery - employee relations, - employee engagement - trust in employer, - morale and reputation; leading to increased voluntary turnover, increased absence levels, and reduced ability to recruit and retain high quality employees.	5	3	15		Effective communication ensured through the agreed ETE Communications strategy.     Be aware of the impact on staff and that their performance might be adversely affected and utilise staff feedback from Pulse Survey     Ensure corporate memory is retained through succession planning     Be aware and plan for future retention issues     Monthly absence and HR reporting to ETE Directors	3	3	2. Annual staff survey questionnaires to be undertaken. Results reviewed and shared.  9	Head of Policy and Business Development	Sep-14		G
ETERR10	Highways and Community Infrastructure		a) deliver Household Recycling	Savings not delivered and potential increased costs leading to significant budget pressures.	3	5		Infrastructure Management and Operations	1. Produce options that will deliver the required £440,000 savings identified within the business plan in 2015/16 for member approval.  2. Strong contract management and close working with legal and procurement to reduce unforeseen costs where possible e.g. management of amount of waste going to landfill. Regular communication, exchange of information and decision-making at the Waste PFI Delivery Board. The Board provides focused management of issues, ensuring contract delivers as required.  3. Now the Waste PFI is fully operational, the full protection afforded by the contract is in place.  4. The contract documentation / commitments are now set and are legally binding.  5. Clear control of the risk of services not being delivered to cost and quality by levying significant penalties and compensations if the contract fails or issues arise.  6. Financial risk is transferred through the PFI contract and we have a lead on negotiations through this period.  7. Waste PFI contractor to secure contract for Refuse Derived Fuel (RDF) option for Compost Like Output (CLO).		5	development through regular monthly meetings to deliver the Assets and Commissioning waste budget for 2014/15.  2. Technical consultants (Jacobs) procured to independently review The level of Third Party Income (TPI) to maximise income from spare capacity at all facilities. The findings will be used in contract management and to ensure the mitigation of costs and produce savings where possible.	Head of Assets & Commissioning  Head of Assets & Commissioning  Head of Assets & Commissioning	April to September 2014  April to September 2014		G

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		Deta	iils of Risk			Inh	herer	nt Risk		Res	sidua	al Risk		Actions			
Risk No.	Service Committee	Risk Description	Trigger	Result	Probability	Impact	Score	Owner	Key Controls	Probability	Impact	Residual Score	Description	Action Owner	Target Date	Revised Target Date	Action Status
													4. Engage with organisations, including Waste Infrastructure Delivery Programme (WIDP) and Waste Operational Savings Programme (WOSP) to identify options in relation to operational savings for the Waste PFI.	Head of Assets & Commissioning	Mar-15		G
													<ol> <li>Legal and financial support to be sought in response to technical feedback options to deliver operational savings.</li> </ol>	Head of Assets & Commissioning	Mar-15		G
ETERR13	Economy and Environment	Borrowing requirement for major transport schemes	Development schemes are delayed, meaning that the County Council needs to borrow to fund schemes that are committed, pending recovery of funds from developers when development commences.	Interest payments on prudential borrowing need to be met through Council budgets, with political/reputational damage to the Council and impacts on the delivery of the wider capital/revenue programme.	3	4 1	12	Development	1. A prudential borrowing strategy is in place to fund infrastructure where appropriate. 2. The scope of major schemes for which there is a funding shortfall can be reduced if necessary. 3. The progress of developments is continuously monitored and the negotiating and borrowing strategies can be adjusted if necessary. 4. The possible implications for the capital/revenue transport programme of interest payments needing to be serviced are being considered. 5. Potential alternative sources of funding are being identified. 6. Effective legal advice is being taken.	3	3	9	of key infrastructure.  2. Monitor the progress of developments and adjust the	Director of Strategy and Development Head of Transport and Infrastructure, Policy and Funding	Ongoing		G G
ETER16	Economy and Environment Highways and Community Infrastructure		Written, verbal or physical threats received by members of staff.	Services withdrawn, personal injury or harm to ETE employee. Impact on CCC reputation.	2	5 1	10		1. Lone working policy. 2. Systems/risk assessments for those most at risk. 3. Service specific procedures in place, e.g. Safe Systems of Work (SSoW). instruction, training, supervision, protective equipment, good diary management, 'call in' and "Buddy" systems, location mapping, active and passive monitoring and/or other means of ensuring an individuals safety. 4. Conflict resolution & Personal Safety training sessions provided 5. Zero tolerance policy against violent, abusive and threatening behaviour signage and guidelines available via CamWeb. 6. ETE Strategic Health and Safety Group	1	5	5		Chair of ETE Strategic Health and Safety Group	Review in Dec-14		G
ETERR17	Economy and Environment	Failure to deliver to the Cambridgeshire Flood Risk Management Programme	Failure to respond to statutory duties related to flood risk.	Significant reputational and financial risk. In addition to possibly liability falling to the Council in the event of a flood incident.	4	4 1	16	Strategy and Development	The Cambridgeshire Flood Risk Management Partnership has been established to provide a strategic overview to a programme of work that will meet the new statutory duties.     The County Council has a Flood and Water Manager and team in post to undertake duties related to the relevant legislation.     The County Council has been allocated a budget from Government to undertaken flood risk management activities.     The Council have recruited a new SUDs manager and a fixed term (2 years) graduate post has been identified to support this increase in work load.		4	8		Head of Growth and Economy  Head of Growth and Economy  Head of Growth and Economy	Ongoing Feb-15 Ongoing		G
ETERR18	Economy and Environment Highways and Community Infrastructure	Failure to manage capacity, safety and maintenance issues on the A14 Cambridge-Huntingdon	issues on the A14. Exacerbated by the withdrawal of the A14 improvement scheme by Government.	New communities cannot be delivered in their totality, undermining their sustainability, viability and the provision of necessary infrastructure. Unsustainable growth proposals may be granted on appeal if infrastructure constraints mean that growth cannot come forward as planned. Additional pressure and maintenance requirements on existing network. Increased road risk to current and expanding road users.	4	4 1	16	Executive Director, ETE	Working with Department for Transport (DfT) and the Highways Agency (HA) to develop short and long-term plans for the improvement of the A14, given the withdrawal of the previous scheme.	2	4	8	the new legislative duties.  1. Work with the Highways Agency (HA) to continue to progress the key development schemes.  2. Plan for managing increased congestion on the surrounding	Head of Growth and Economy  Head of Transport and Infrastructure, Policy and Funding  Head of Assets and Commissioning  Head of Assets and Commissioning	Ongoing Ongoing Ongoing Ongoing		G G G

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		Deta	ails of Risk			Inh	herei	nt Risk		Res	sidua	l Risk		Actions			$\square$
Risk No.	Service Committee	Risk Description	Trigger	Result	Probability	Impact	Score	Owner	Key Controls	Probability	Impact	Residual Score	Description	Action Owner	Target Date	Revised Target Date	Action Status
													5. Work with Department for Transport (DfT) on the new A14 scheme that entered the roads programme in July 2012. This includes development of the local funding proposition and working with DfT and the HA on the specification and design of the scheme towards submission of the Development Consent Order.	Head of Growth and Economy	Ongoing		G
ETERR22	Economy and Environment	Introduction of charging for Parking at Park & Ride (P&R) sites	P&R sites	Reputational risk to the Council through failure to generate required revenue in order to meet targets to make running of the site cost neutral. Falling ridership affects viability of bus routes and impact on targets to reduce congestion.  The accessibility needs of	4	4 1	16	Development	Business case identified the probability of a 5% drop in passenger numbers post implementation. This drop in demand was identified by WS Atkins in an elasticity of demand paper.     Paper also predicted the drop to be temporary in nature. Charge set low at only £1 per vehicle. An Automatic Number Plate Recognition (ANPR) system rather than a barrier control system used to reduce inconvenience to passengers. An hour for free period introduced to ensure drop-off and pick-ups.     A. Ability for payment to be made in advance with discounts and via mobile, online, cash and credit/debit cards.	3	3	9	Close monitoring of passenger numbers from first day of implementation      Scrutiny and implementation of further cost saving measures.	Head of Passenger Transport Head of Passenger Transport	From July - 14 Sep-14		G
ETERR24	Economy and	Deregistration of commercial		Cambridgeshire residents are not met, contributing to social exclusion, poor take up of employment and education opportunities, and reduced quality of life.  Communities are left with no					5. ANPR system allows additional income to be gained by offering overnight parking at a premium rate. 6. ANPR system allows further cost reductions in other areas. (barrier systems).  1. Work with operators to receive information about their plans at an early stage.				Quarterly meeting held with	Head of Passenger	Ongoing		
	Environment	bus services		public transport.	3	4 1	12	Strategy and Development	2. Negotiate service provision for key journeys/requirements. 3. £1.5m available annually to provide these types of service and if there is a new requirement funding can be diverted away from existing services where the need is assessed as being lower. Close links with the Cambridgeshire Future Transport (CFT) programme, CRR22.	2	4	8	Stagecoach  2. Regular contact with Whippet and Norfolk Green.	Transport	Ongoing		
ETERR25	Economy and Environment Highways and Community Infrastructure	Failure to effectively transfer from a Leader/Cabinet model to a Committee System	process  2. Failure to inform/train members and key officers in the new governance arrangements	The Council is unable to undertake its business in an effective manner     Reputational damage to the Council     Legislative and Regulatory non compliance	4	4 1	16	Director, ETE	Training programme developed for ETE committees including Business Planning process     Reviewed Terms of Reference for ETE Committees     Scheme of authorisation for ETE in place     Agenda Plan and process for scheduling papers in place and reviewed at committees and Directorate Management team meetings     Spokes meetings established and underway	2	4	8	on ETE Services and functions  2. Library Service Seminar and Community Hub visit.	Head of Policy and Business Development Head of Policy and Business Development	Sep-14 Oct-14		G
ETERR26	Economy and Environment	Growth and major sites fail to meet local authorities requirements and policy objectives	planning applications 2. Failure to successfully ensure the delivery of services. 3.Exacerbrated by changes in national and local planning policy and relaxation of local authorities development control powers	New communities are delivered to sub standard quality, failing to meet the standards required by local authorities and expected residents. Public service delivery to new communities is hampered. Unsustainable growth proposals maybe granted on appeal if infrastructure constraints meant that growth cannot come forward as planned. Additional pressure and maintenance requirements on the existing road network. Increased road risk to current and expanding road users.	3	4 1	12		1. CCC manage the Quality Panel. 2. Strong partnerships exist with Joint Planning colleagues. 3. The County Council maintains up-to-date demographic forecasts to project service and infrastructure needs. 4. External funding sources, such as the Housing Growth Fund, help to ensure that the infrastructure provision for development sites meets the Local Authorities' requirements. 5. County Council responses to consultations on emerging policy ensure that the policies of partner organisations reflect County requirements. 6. Local Plan seek to secure aspirational affordable housing targets 30-40% across Cambridgeshire and appropriate infrastructure.	2	4	8	1. Outstanding objections against South Cambs District Council and City Local Plans for lack of provision to secure a suitable site for:  • a household recycling centre to serve Cambridge and the South of Cambridge.  • a secondary school site to serve east Cambridge (ETE Committee considered conditional withdrawal of objections 8th July 2014) Evidence base being prepared for examination scheduled for October 2014.  2. Shape the proposals for the Alconbury Weald through the planning application process and pre-application discussions for phase 1.	,	Sept 14  Dec-14		A A

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Appendix 3

		Deta	ils of Risk			Inhere	ent Risk		Resi	idual	l Risk		Actions			
Risk No.	Service Committee	Risk Description	Trigger	Result	Probability Impact	Score	Owner	Key Controls	Probability	Impact	Residual Score	Description	Action Owner	Target Date	Revised Target Date	Action Status
													Head of Growth and Economy	Dec-14		Α

VERY HIGH (V)	5	10	15	20	25
HIGH (H)	4	8	12	16	20
MEDIUM (M)	3	6	9	12	15
LOW (L)	2	4	6	8	10
NEGLIGIBLE	1	2	3	4	5
LIKELIHOOD	VERY RARE	UNLIKELY	POSSIBLE	LIKELY	VERY LIKELY

1-4 GREEN 5-15 AMBER 16-25 RED

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# **RISK F**

VERSION NUMBER	VERSION DATE	AGREED BY	
1	Jun-12	SMT	
2	Nov-13	EMT	

# **REGISTER VERSION HISTORY**

FURTHER DETAILS
First version in new format
changes agreed in 'Risk Mgt_App1_ November_13'

### **RISK SCORING MATRIX**

VERY HIGH (V)	5	10	15	20	25
HIGH (H)	4	8	12	16	20
MEDIUM (M)	3	6	9	12	15
LOW (L)	2	4	6	8	10
NEGLIGIBLE	1	2	3	4	5
LIKELIHOOD	VERY RARE	UNLIKELY	POSSIBLE	LIKELY	VERY LIKELY

Red scores - excess of Council's risk appetite - action needed to redress, quarterly monitoring Amber scores - likely to cause the Council some difficulties - quarterly monitoring Green scores - monitor as necessary

Descriptors to assist in the scoring of risk impact are detailed below

Likelihood scoring is left to the discretion of managers as it is very subjective

#### **IMPACT DESCRIPTORS**

The following descriptors are designed to assist the scoring of the impact of a risk:

	Negligible (1)	Low (2)	Medium (3)	High (4)	Very High (5)
Legal and Regulatory	Minor civil litigation or regulatory criticism	Minor regulatory enforcement	Major civil litigation and/or local public enquiry	Major civil litigation setting precedent and/or national public enquiry	Section 151 or government intervention or criminal charges
Financial	<£0.5m	<£1.0m	<£5m	<£10m	>£10m
Service provision	(a) Insignificant disruption to service delivery	(a)Minor disruption to service delivery	(a) Moderate direct effect on service delivery	(a) Major disruption to service delivery	(a) Critical long term disruption to service delivery
People and Safeguarding	No injuries	Low level of minor injuries	Significant level of minor injuries and/or instances of mistreatment or abuse of an individual for whom the Council has a responsibility	Serious injury and/or serious mistreatment or abuse of an individual for whom the Council has a responsibility	Death of an employee or individual for whom the Council has a responsibility or serious mistreatment or abuse resulting in criminal charges
Reputation	No reputational impact	Minimal negative local media reporting	Significant negative front page reports/editorial	Sustained negative coverage in local media or	Significant and sustained local opposition to the Council's

1	i	loominent in the	negative	policies	ı
		local media	reporting in the		
			national media		