

REPORT TO: SHAREHOLDER SUB COMMITTEE

DATE: 7 NOVEMBER 2019

TITLE: RISK REGISTER

LEAD OFFICER: ANDREW MURRAY, HEAD OF HOUSING
(01279) 446676

CONTRIBUTING OFFICER: STUART MOSELEY, INSURANCE AND RISK
MANAGER (01279) 446215

RECOMMENDED that the Sub Committee notes:

- A** The strategic risks as relating to HTS (Property and Environment) Ltd (HTS) together with their analysis and mitigation.
- B** HTS's ongoing actions to address Information Governance and Data Compliance concerns from Harlow Council

BACKGROUND

1. The SSC terms of reference includes responsibility to ensure HTS risks are adequately defined, monitored and controlled.
2. The Council has its own Corporate Risk register which is regularly reviewed by Senior Management Board (SMB), reported to each Audit and Standards Committee meeting for scrutiny and challenge together with escalations, if required. This is also reported to Cabinet quarterly.
3. Within the corporate risk register, two strategic risks have been identified which impact upon the Council. These are: 'Provision of Repairs, maintenance, landscape and street scene services' provided by HTS, and; 'Information Governance' as relates to Data Protection compliance.

ISSUES/PROPOSALS

4. The HTS risk register monitors its own corporate risks as relates to the business. They are living documents, evolving, being reported to their Board quarterly. The Council's reviews regularly ensuring issues are escalated, if required, to the Sub Committee.
5. HTS have aligned methodology for risk articulation, analysis and reporting with that used by the Council. Strategic risks are subject to regular quarterly reviews and report to HTS Board and to major reviews indicated by target date. This is to ensure they are concurrent with the HTS's Corporate Plan. The updated HTS Strategic Risk Register is shown in Appendix A.

6. Since the last risk report to the Sub Committee, HTS has continued to liaise with Harlow Council regarding controls for Information Governance relating to compliance a Data Protection/Information Security Action Plan has been set up to ensure HTS is properly dealing with:
 - a) Policy and procedures;
 - b) Privacy Notices;
 - c) Privacy Impact Assessment;
 - d) Data Protection Impact Assessments;
 - e) Objectives (linked to IS27001);
 - f) Data Protection Officer training;
 - g) Workforce Training;
 - h) Publicity and Reminders;
 - i) Contractors;
 - j) Security;
 - k) Audit of Data Protection; and
 - l) Audit of Electronic Data.

7. Identified actions within the plan are being worked through. To date HTS report that:
 - a) Two key staff have completed and passed General Data Protection Regulations foundation and practitioner training certificate;
 - b) Data champions to be appointed across the business;
 - c) All staff have attended training sessions;
 - d) Procedures and policies have been reviewed and amended;
 - e) Board Members and Managers trained;
 - f) Data breach log set up and reported monthly to SMB; and
 - g) Harlow Council is preparing the HTS ROPA & Information Sharing Agreement.

8. HTS will continue to work with the Council Officers to implement the action plan and address any recommendations arising from the Council's internal audit report.

IMPLICATIONS

Environment and Planning (Includes Sustainability)

None specific.

Author: Andrew Bramidge, Head of Environment and Planning

Finance (Includes ICT, and Property and Facilities)

As contained within the report.

Author: Simon Freeman, Head of Finance and Deputy to the Chief Executive

Housing

As outlined in the report.

Author: Andrew Murray, Head of Housing

Community Wellbeing (Includes Equalities and Social Inclusion)

None specific.

Author: Jane Greer, Head of Community Wellbeing

Governance (Includes HR)

HTS (Property and Environment) Ltd [HTS] have identified in their corporate risk register, two strategic risks these are: 'Provision of Repairs, maintenance, landscape and street scene services' provided by HTS, and; 'Information Governance' as relates to Data Protection compliance. If HTS does not have sufficiently robust systems in place to ensure compliance with the risks identified the Council could suffer reputational and financial damage, to mitigate the risks the Council will need to satisfy itself that HTS are adhering to the KPIs as identified in the contract for services. With regard to data compliance HTS will need to provide the Council with copies of their data sharing agreements and Registers of Processing Activity, and have a full suite of documents available for inspection.

Author: Simon Hill, Head of Governance

Appendices

Appendix A – Strategic Risk Register

Background Papers

None.

Glossary of terms/abbreviations used

HTS – HTS (Property and Environment) Ltd

ROPA – Record of Processing Activities

SMB – Senior Management Board