

Ongoing Risks and Risks Identified by Service Management Teams and Management Team

| | Risk Identified | Background | New or ongoing | Reason for removal / ongoing |
|---------------------------|---|---|---|--|
| Executive Services | Homes For Ukraine Scheme | Ongoing home assessments and support for Ukrainians hosted under the Homes for Ukraine Scheme. There is a risk of homelessness and duty to place in TA, therefore work needs to be undertaken by the Resettlement Worker to support with sustainable living arrangements. | Ongoing. | Conflict in Ukraine continues and new arrivals into the borough are ongoing. HFU visas are for 3 years and there is now an option to apply for an 18 month Ukraine Permission Extension once the HFU visa expires. All new hosts/houses must be checked and welfare visits undertaken. Rematches via the HFU scheme are unsustainable in the longer term and work needs to be undertaken to support families into PRS or rent a room agreements. |
| | Successful delivery of the UK Shared Prosperity Fund Programme (inc. Rural England Prosperity Fund) | Having had our initial three-year T&M Investment Plan approved by MHCLG in 2022, implementation of projects required for period up to March 2025). A one-year extension (to March 2026) was awarded in late 2024. | Ongoing. | The 2022-25 UKSPF Programme was ultimately 100% by the end of the financial year and approval for the 2025-26 programme was secured in March 2025. As we get close to the end of Q3, the 2025-26 programme is currently around 70% spent, with all projects progressing as expected. |
| | Corporate Insurance | Increases and changes to premiums for 2024/25 and 2025/26 insured year | Ongoing | The Councils Insurers have made changes to the charges included within the premiums. Therefore changes will be required to capital and revenue project evaluations to include insurance assessment. |
| | Payroll | Key information being supplied to Payroll in a timely manner, causing risk of staff and members not being paid. | Ongoing. | Information to be included in the pay run must be received no later than three working days into the month. Delays in these submissions jeopardised the payment to all staff requiring addition unsocial hours to be worked by the payroll team. |
| | Council Tax Administration | Proposals from Government on changes to collection methods and exemptions to be granted. Likely impact on the cashflow for the council. | Ongoing. | Consultation response to be shared with members. |
| | Current Economic Issues | Whilst the Strategic Risk Register has removed the elements of Budget Gap and Saving and Transformation Strategy due to the current financial uncertainty situation that has occurred in recent weeks. A review will be undertaken of the Council's overall financial position in the forthcoming months. | NEW | A revised MTFS will be presented to Cabinet for the July cycle, this will include elements of the sensitivity analysis allowing for financial input from external advisors. |
| | Council Tax Reduction Scheme (CTRS) | Following removal of 2 child benefit cap by Central Government, this impact on current Council Tax reduction cases is likely cause change to ongoing reduction on Council Tax. With fewer families being eligible or lower awards being granted. | NEW | Given the changes there could be higher levels of enquiry on staff, and potential for additional needs through Section 13a. Change to Council Scheme would require full consultation with the public. There is a review planned for CTRS in 2026/27 for implementation in 2027/28, this will consider the impact beyond this point. |
| Supported Accommodation | The Supported Housing (Regulatory Oversight) Act 2023 came in to force August 2023. Assessment of the act has been ongoing and a consultation on how the act will regulated in practice. The practice is likely to involve a Licensing duty for the responsibility of the Council. Further implications could affect Housing Benefit payments to Landlord where care levels are considered to be unsuitable for the tenant. | Ongoing | Consultation released by central government now being considered. | |

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| Central Services | Gibson Building - unable to deliver financial saving which has been assumed within MTFS | Cabinet agreed in Sept 2022 that the main offices of the Council should remain located at Kings Hill. On 3 June 2025 Cabinet resolved that the freehold option to dispose of Gibson West be progressed. | Updated | Need to keep under review to ensure that changes in office accommodation deliver value for money and deliver identified savings. Deal agreed with KCC in respect of covenants. Risk of capital cost for works to Gibson East exceeding previously agreed budget. |
| | Freedom of Information/ EIR/ Subject Access Requests | No dedicated resource to oversee management of FOI, EIR & SAR request compliance. Response rates within statutory deadlines for FOI & EIR are typically between 75-80%, which fall below the ICO's recommended performance target (min of 90% responded to within statutory deadlines). | Ongoing | Number of requests continue to rise, particularly the number of requests made under the Data Protection Act 2018. This creates additional capacity issues for services across the Council, particularly those who receive a large number of requests. Requests for advice from services also continue to rise, as requests for information become more complex. Report on FOI/ EIR/ SAR performance submitted to O&S Committee on 11 Sept 2025 - Committee supported a review of resources for delivery of information requests. New post of Information Governance Manager approved by General Purposes Committee on 21 January 2026. Will be removed once recruitment to the post is complete and new postholder in place. |
| | IT Security (formerly COCO Compliance) | Review of IT Infrastructure identified several areas of weakness for IT standards compliance | Ongoing | Number of risks removed, expected that remaining risks, once removed, will allow full compliance. |
| | Cyber Security | Request for 24hr monitoring now being considered as part of SIRO annual report | Ongoing | |
| | IT Resources | Resource capacity for both Development and Technical Staff | Ongoing | The current demands on IT Staff are placing increased pressures on the resource capacity given competing demands of corporate systems being reviewed and implemented, namely the move from Agile to IDOX. |
| | Street Naming and Numbering | Resourcing within Team | Ongoing | This remains a risk due to the reversion from Agile to IDOX |
| | GDPR Compliance findings | Redacted information being stored with unredacted information | Ongoing | Requires testing once new IDOX system is available. |
| | Back Scanning | Scanning now complete, hand over to Information at Work systems and service recognition. | Ongoing | Services all have access to digitised documents held in NEC's interim cloud storage. Pending transfer to TMBC corporate document management system. Will be removed as a risk once migration complete. |

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| Planning, Housing and Environmental Health | Temporary Accommodation (TA) | TA consultancy review undertaken Dec 2021, actions implemented in 2022. Cost of living crisis and DA legislation implementation are impacting on maintaining TA levels within the agreed range. | Ongoing | TA costs remain high, as does level of need. Project underway to look at sustainable TA portfolio approach to help manage unit costs for TA. This is alongside ongoing work/training in service to support demand. |
| | Temporary Accommodation (TA) | Personal injury claims | Ongoing | Updated inspection regime being developed by officers. |
| | Food & Safety | Increased risk of food complaints/poisoning. Additional resources to manage backlog of inspections. | Ongoing | During the Covid-19 crisis the ceasing/reduction in the food hygiene inspection regime may result in food safety issues. There will also be a backlog of food safety inspections due to restrictions on visiting/businesses closed. Agreed catch up programme in place utilising COMF funding. |
| | Increased number of planning appeals/inquiries | Application determination timescales not being met, more speculative development, creates reputational risks and increases likelihood of appeals. | Ongoing | Volume and complexity of applications coming forward in parallel with local plan progression and given current uncertainties in timescales for adoption. MT agreed agency planning funding for short term. Head of Planning conducting service review summer 2022 |
| | Staffing challenges in Planning services | Ongoing recruitment and retention difficulties in the sector and in T&M specifically. Several recruitment campaigns carried out. | Ongoing. | MT agreed that development of a Workforce Strategy will include recruitment and retention. Part 2 report to GP in July 2023 to look at immediate pressures. This will likely be followed by a new recruitment campaign and therefore this risk remains. |
| | Windmill Lane Gypsy Site | KCC have requested return of management of this site (which is already owned by TMBC) to TMBC on 31 March 2024. This is part of a programme of returns to districts of their owned G&T sites. Initial discussions about management issues and costs have been undertaken. | Ongoing | The return requires Member approval, proposing that this happens via Cabinet in Jan 2024. There are a mixture of Property and Housing risks relating to this potential transfer. Officers are awaiting detailed information from KCC on maintenance costs, the detailed works schedule for grant funded improvements that are scheduled to complete before end of financial year and rent roll. TMBC will require a management arrangement for the site, which is being explored with neighbouring authorities as well as external providers. There will also be a requirement for the Council to have a G&T Allocation Scheme. Risk that the approach to management of this site is not fully in place before the proposed transfer, which could cause liability issues. Also need to consider specific equalities considerations for this group of residents. |
| | Local Plan | Reg 18 carried out in Autumn 2022. Changes to NPPF and proposed changes to system via LURB published December 2022. Assessing options for delivery of a Local Plan. | Ongoing | Members to make a decision on a revised Local Development Scheme in Summer 2023. This is subject to a number of challenges including ongoing delays in Govt announcements on national planning policy. The Council has decided to continue progressing the Local Plan under the current legislative and National Planning Policy Framework. It will be critical that the new plan is prepared in compliance with the regulatory framework and relies on a robust evidence base that meets the requirement of the NPPF so that the plan can be found to be sound at the examination stage. Timing is of the essence as the Local Plan will need to be submitted to the Planning Inspectorate by 30th June 2025. The Council has recently engaged Trowers and Hamlins Law Firm to advise and support the Planning Policy Team up until adoption stage. |

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| Street Scene, Leisure and Technical Services | Phone Signal | CEOs having difficulty enforcing parking in Tonbridge and customers having issues accessing Ringo due to deterioration in mobile phone signal. | Ongoing | Multi-network sim cards issues to CEO's and liaison taking place with service providers. Contactless card payments currently being reviewed. |
| | Garden Waste invoices | Delay in invoices being issued to subscribers wanting to renew due to IT issues. | Ongoing | Financial Services reviewing use of recurring payments. |
| | Utilities costs | Significant energy price increases at leisure centres is resulting in financial cost to the Council under the risk sharing agreement in the Management Agreement with the Trust. | Ongoing | Trust providing regular updates via Strategic/Service Fee meetings - cost of swim charges increased to help contribute to additional cost, energy saving initiatives being investigated and implemented and central government being lobbied. Government grants applied for successfully to reduce utility costs e.g. solar panels and air source heat pumps. |
| | CEO Recruitment | Difficulties in recruiting into CEO posts resulting in reduced patrolling and income generation. | Ongoing. | Vacancies needing to be advertised on an ongoing basis. Four posts are currently not filled. |
| | KRF Review | The KRF have undertaken a review and plan to make adjustments to how the forum operates. | Ongoing. | Risks associated with increased responsibility being undertaken by LA's . Many Kent Chief Executives are recruiting dedicated full-time resource to enable work to be developed and maintained. This appears to be requiring LA's to delivery work areas that were historically delivered through the KRF and KRT. |
| | Business Continuity & Emergency Planning | The current structure of the LRF and legislation has been added to. The Kent Resilience Forum has undergone review with significant changes to how the Kent Resilience Team will provide support and guidance to Local Authorities. The UK Government has also recently published a new 'UK Government Resilience Framework'. Further guidance is expected but the theme is around increasing locally led resilience and planning at the LA level. Additional recommendations have now been published in relation to the Grenfell Tower Enquiry. These are likely to be included with the review of the CCA. | Ongoing | Need to track new guidance and review how we contribute and participate in the Kent Resilience Forum. We also need to be able to ensure that we maintain a fit-for-purpose organisation to enable suitable response. |