

# Appendix 3 - Full Risk Register

Strategic Risks																
Council	Ref.	Name	Description	Gross Impact	Gross Probability	Gross Risk		Current Impact	Current Probability	Residual Risk		Last updated	Change	Since	Previous rating	
Shared	<b>S01</b>	<b>Policy and legislative change</b>	The councils fail to adequately respond to the implications of changing national policy resulting in loss of opportunity, reputational damage or legal challenge	5	4	20	▲	4	3	12	●	Sep-16	➔	Jun 16	12	●
<p>Current Controls : JMT forward plan, Executive and Cabinet Forward plans, Scrutiny Committees. Business and Service Planning. Business Planning meetings to brief Executive and Cabinet. Highly professional, competent, qualified staff Good networks established locally, regionally and nationally National guidance interpreting legislation available and used regularly Members aware and are briefed regularly including lead members/portfolio holders in one to one's with JMT members. JMT undertake policy oversight role. Quarterly Health &amp; Safety reporting.</p> <p>Assurances : No legal challenge has been made to any decision by either Council alleging misapplication of the law</p> <p><b>Risk - Mitigating actions update</b> No change for Q2</p>																
Shared	<b>S02</b>	<b>Financial resilience</b>	The impact of external financial shocks, new policy and increased service demand reduces the councils medium and long term financial viability	4	4	16	▲	3	4	12	●	Sep-16	➔	Jun 16	12	●
<p>Current Controls : Highly professional, competent, qualified staff Good networks established locally, regionally and nationally National guidance interpreting legislation available and used regularly Members aware and are briefed regularly Participate in Northamptonshire Finance Officers and Oxfordshire Treasurers' Association's work streams Programme management approach being taken</p> <p>Assurances : Budget and Financial Strategy Committee (SNC) Budget Planning Committee (CDC) Executive, Cabinet, Audit Committee and Accounts, Audit and Risk Committee, Scrutiny Committees</p>																
Shared	<b>S03</b>	<b>Capital investment</b>	Poor investment and asset management results in the councils not maximising financial return or losing income.	4	3	12	●	3	2	06	●	Sep-16	➔	Jun 16	06	●
<p>Current Controls : Treasury management policies in place Investment strategies in place Regular financial and performance monitoring in place Independent third party advisers in place and different ones used at each Council Regular bulletins and advice received from advisers Fund managers in place Property portfolio income monitored through financial management arrangements on a regular basis Experienced professionally qualified staff employed at both Councils. Asset Management review and conclusions expected to be reported at both Councils by the end of the year.</p> <p>Assurances : Budget and Financial Strategy Committee (SNC) Budget Planning Committee (CDC) Executive, Cabinet, Audit Committee and Accounts, Audit and Risk Committee, Scrutiny Committees</p>																
Shared	<b>S07</b>	<b>Customer Service Improvement (including channel shift)</b>	Failure to increase internet usage or self service and improve customer service processes results in higher costs and decreased customer satisfaction	3	4	12	●	3	3	09	●	Sep-16	➔	Jun 16	09	●
<p>Current Controls : CDC – customer service standards in place (e.g. voicemail) Web – both councils redesign undertaken and on-going development is undertaken – this includes online forms and payment Managers discuss service changes with customer services to mitigate any negative impact on customer service On-going review of the web (SNC you said we did page – noting actions taken from customer feedback) Customer communications in local / residents newsletters Customer complaints process JMT highlight service changes to customer service teams to ensure web/service team can deliver, project also part of the transformation programme with associated governance. Results of CDC Customer Satisfaction Survey presented to Executive October 2015 and was well received. The Key Services to be Maintained summary instrumental in Business and Service Planning processes. A similar Survey is being prepared for SNC and will go live June/July 2016.</p> <p>Assurances : Project governance, performance management reporting, customer insight reporting.</p>																

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CDC	<b>S10</b>	<b>Deprivation and Health Inequalities (Brighter Futures in Banbury)</b>	Failure to deliver the Brighter Futures in Banbury programme results in long term health and deprivation objectives not being met	4	3	12	●	3	2	06	●	Sep-16	↓	Jun 16	09	●
<p>Current Controls : Long term commitment to support local people and communities as many issues can only be addressed on this basis. Multi agency actions with clear and common objectives. Additional funding from Government grants to supplement current resources. Local Strategic Partnership focus on Brighter Futures in Banbury programme. Contingency fund made available in CDC budget. Programme co-ordination role in place. Quarterly performance management in place.</p> <p>Assurances : Project governance Local Strategic Partnership (LSP) oversight, Quarterly reporting Annual Report</p>																
CDC	<b>S11</b>	<b>CDC Local Plan</b>	Failure to ensure sound local plan is submitted results in inappropriate growth in inappropriate places. This leads to negative (or failure to optimise) economic, social, community and environmental gain. There is also potential negative impact on the council's ability to deliver its strategic objectives and manage its reputation.	5	4	20	▲	3	3	09	●	Sep-16	→	Jun 16	09	●
<p>Current Controls : A Local Development Scheme is in place which details the timeframes and deliverables to underpin the work Resources are in place to support delivery including QC support</p> <p>Assurances : Full Council</p> <p><b>Risk - Mitigating actions update</b></p> <p>Options stage for Partial Review is being considered at November 2016 Executive</p>																
CDC	<b>S12</b>	<b>North West Bicester (Eco-town)</b>	Failure to deliver the project results in loss of economic benefit, local dissatisfaction and reputational damage to the council	4	4	16	▲	3	3	09	●	Sep-16	→	Jun 16	09	●
<p>Current Controls : Planning policy development through Local Plan Eco Town Project plan &amp; related partnerships Working with private &amp; public sector partners Programme Board in place Lead Member in place</p> <p>Assurances : Programme Governance Performance Management</p>																
CDC	<b>S13</b>	<b>Bicester town centre development</b>	Failure to deliver the project results in loss of economic benefit, local dissatisfaction and reputational damage to the council	4	3	12	●	3	3	09	●	Sep-16	→	Jun 16	09	●
<p>Current Controls : Project manager in lead role Project Board Legal agreements in place Joint venture with the developer (underpinned by legal agreements) Monthly performance / projects reports Resources and technical advice provided as part of the developer agreement</p> <p>Assurances : Project Governance</p>																
CDC	<b>S14</b>	<b>Graven Hill</b>	Failure to deliver the project results in severe loss of economic benefit, local dissatisfaction and damage to reputation	4	3	12	●	3	3	09	●	Sep-16	→	Jun 16	09	●

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Council	Ref.	Name	Description	Gross Impact	Gross Probability	Gross Risk		Current Impact	Current Probability	Residual Risk	Last updated	Change	Since	Previous	rating
Current Controls : Project Manager Project Board Companies set up Business Plan and Finance Plan being monitored Assurances : Project Governance															
Shared	S16	<b>Transformation Programme</b>	Failure to deliver the programme results in failure to: <ul style="list-style-type: none"> <li>• deliver savings</li> <li>• deliver the councils' commercial objectives</li> <li>• reputation damage</li> <li>• improve services and deliver efficiencies</li> </ul>	4	4	16	▲	3	3	09	●	→	Jun 16	09	●
Current Controls : Current: Programme plan in place Performance Management Member Governance CEO programme sponsor Dedicated programme team Future: All major proposals will be underpinned by business cases Assurances : Annual Audit Quarterly performance management Monthly member oversight															
CDC	S17	<b>Build Development Programme</b>	Failure to deliver the Build! Programme resulting in financial loss, loss of economic benefit, local dissatisfaction and damage to the Council's reputation.	5	3	15	●	4	3	12	●	→	Jun 16	12	●
Current Controls : • Delivery Manager and Project Board • Legal Agreements in place for land acquisitions and contracts with consultants and contractors • Monthly project/performance reports • Business Plan and Financial Plan monitoring • Professional Construction Management • Effective Communications Management • Catastrophic would be a serious (fatal) health and safety incident which is always possible in a construction project but mitigated by sound Health & Safety procedures and Construction, Design & Management measures. • Financial risks are major given the level of investment but mitigated by budget management and professional construction management • Overall reputational risk is major given the profile of this project locally and nationally but managed by communications and strong project management. Assurances : • Programme Governance • Information Management System (IMS) with the HCA • HCA Programme Audit (annually) • HCA Design and Quality Audit • Considerate constructor scheme • Fortnightly Project Boards; weekly project reviews															
CDC	S18	<b>Banbury Development</b>	The sites are complex and in multiple ownership. There are conflicting development pressures and challenges with site viability	4	4	16	▲	4	4	16	▲	→	Jun 16	12	●
Current Controls : Regular meetings of the Project Board Adopted Asset management Strategy and review of Council car park sites Interdependencies map produced showing progress on all major development sites in Banbury Adopted local Plan leading to Completion of Banbury Masterplan and Canalside Supplementary Planning Document (SPD) Soft Market testing of sites to be concluded in February 2016 Assurances : Regular risk monitoring and review discussions by the project board															
CDC	S19	<b>Asset Management</b>	Failure to maximise the value of council assets through inaction, or wrong action leading to devaluation or wasted value.	4	4	16	▲	4	2	08	●	→	Jun 16	08	●
Current Controls : In 2015/16 to agree and implement 1) Asset Strategy Resource Plan 2) Operational Offices Plan 3) Car Parks Plan 4) Community Buildings Plan 5) Local Centres Plan Future Controls:- In 2016/17 to agree and implement 1) Data and Systems Plan 2) Operational Depot Plan 3) Leisure Buildings Plan 4) Commercial Investment Plan Assurances : At the current time an Accommodation Asset Strategy Board provides a forum for debate and discussion about property matters. The Board comprises the Lead Members for Finance and Estates/Economy. The officer support is made up of representatives of Estates, Regeneration, Housing, Finance, and Bicester. The role and responsibilities of the Board will be clarified having regard to the actions and priorities arising out of the Asset Strategy.															
<b>Risk - Mitigating actions update</b> Various sites and other issues are being considered through the Accommodation Group and the Banbury Development Board. Reporting of progress made to members as required. The															

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Council	Ref.	Name	Description	Gross Impact	Gross Probability	Gross Risk		Current Impact	Current Probability	Residual Risk	Last updated	Change	Since	Previous rating	
Accommodation Strategy report with initial recommendations from Officers will emerge in the new year. Car park strategy and future management of car parks is being progressed through the Banbury Development Board.															
Shared	S20	<b>Dry Recycling Contract</b>	<p>Failure to renegotiate/extend Dry Recycling Contract due February 2015. Current suppliers, UPM were asked to extend Contract for a further three years but are trying to get out of an extension due to financial losses.</p> <p>Failure to legally enforce contract extension option or renegotiate contract could lead to the need for short term arrangements or re-tender of the contract. Commodity prices are falling - with reduced oil prices plastic recycling prices will fall. Paper prices already fallen due to falling newspaper. Financial risk of reduced income. Service risk if outlet for recycling not secured.</p>	4	4	16	▲	4	3	12	Sep-16	➔	Jun 16	12	●
Current Controls : Legal, Procurement & financial advice															
Assurances :															
<b>Risk - Update</b>															
There has been some improvement in recycling prices especially cardboard and the various grades of paper but this isn't sufficient for the business to yet be profitable for UPM.															
We are in discussion with Procurement, UPM and other authorities (Aylesbury Vale) involved in the contract about the way ahead following the current contract finishing in February 2018															
Shared	S21	<b>Oxfordshire Devolution Deal and Unitary Authority (ODD&amp;UA) - Stage 1 Options Appraisal Oxfordshire Devolution Deal and Unitary Authority (ODD&amp;UA)</b>	<p>The Council fails to: grasp the opportunity for transformation/reform across all agencies to benefit the local area and deliver further efficiencies</p> <ul style="list-style-type: none"> <li>ensure all stakeholders (internal and external) are engaged and understand options as they emerge</li> <li>obtain and provide all relevant data to support options appraisal resulting in long term negative impact upon better outcomes for our area including quality of life for local residents, economic growth, financial sustainability and on the council's reputation itself.</li> </ul>	5	3	15	●	5	2	10	Sep-16	▼	Jun 16	12	●



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Corporate Risks																
Council	Ref.	Name	Description	Gross Impact	Gross Probability	Gross Risk		Current Impact	Current Probability	Residual Risk		Last updated	Change	Since	Previous rating	
Shared	<b>C01</b>	<b>Business Continuity</b>	Plans are not in place and assumptions are made about the Disaster Recovery (DR) arrangements in the event of a Business Critical (BC) incident, leading to failure to ensure services can be delivered in the event of a issue resulting in service failure and reputational damage	5	4	20	▲	3	4	12	●	Sep-16	➔	Jun 16	12	●
<p>Current Controls : Business continuity strategy in place All services prioritised and recover plans reflect the requirements of critical services ICT disaster recovery arrangements in place Joint Management Team lead identified Incident management team identified All services undertake annual business impact assessments</p> <p>Assurances : There is a systematic project in place focusing on critical services to ensure that absolute requirements can be met; planned testing to be arranged. Audit and business continuity plan refresh Quarter 4</p>																
CDC	<b>C02</b>	<b>CDC - ICT Loss of Systems</b>	Failure of ICT services including telephones and remote access. Leading to a negative impact on customers, loss of business continuity and cost to the council (in terms of resources and reputation.)	4	4	16	▲	4	4	16	▲	Sep-16	✖	Jun 16	09	●
<p>Current Controls : BCP Plan Disaster recovery (DR) arrangements (CDC) Recovery site (CDC) Back up of systems Process and standards (compliance regime)</p> <p>Assurances : Formal auditing, IT Health check and benchmarking with best in private and public sector.</p> <p><b>Risk - Mitigating actions update</b> IT Strategy has been written and is awaiting approval.</p> <p>The council-wide DR/BC is not currently fit for purpose and will be addressed through the IT Transformation programme that has been recommended.</p>																
Shared	<b>C04</b>	<b>Corporate Fraud</b>	Lack of corporate governance and control results in fraud from either within or outside the councils heightened by the transfer of staff to the Single Fraud Investigation Service (SFIS) from February 2015.	4	4	16	▲	3	2	06	●	Sep-16	✔	Jun 16	12	●
<p>Current Controls : Professionally qualified finance staff. Communication of anti-fraud messages. Specific corporate fraud resource within the Councils. Fraud risk assessments carried out periodically. Audit Committee at SNC. Accounts, Audit and Risk Committee at CDC Benefit fraud campaigns advertised. Benefit fraud identification and convictions communicated to the local press. Internal controls processes and procedures (segregation of duties, checking of information etc.) Periodic checking of data (single person discounts, Audit Commission data matching etc.) Membership of National Anti Fraud Network. Role of S151 and monitoring officers. Fraud detection &amp; prevention corporate policies in place such as Whistle Blowing and Anti-fraud &amp; Corruption Policy. Standard agenda items on Accounts, Audit and Risk Committee and Audit Committee. Use of internal and external audit as part of planned programme and on an ad-hoc basis as required.</p> <p>Assurances :</p>																
Shared	<b>C05</b>	<b>Managing Data and Information</b>	Poor data quality or lack of relevant information results in poor decision making	4	4	16	▲	2	3	06	●	Sep-16	➔	Jun 16	06	●
<p>Current Controls : Audit and data quality health checks Annual target setting process Annual PMF review Data quality policies in place Quarterly performance reporting Monthly tracking of</p>																

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Council	Ref.	Name	Description	Gross Impact	Gross Probability	Gross Risk		Current Impact	Current Probability	Residual Risk	Last updated	Change	Since	Previous rating	
<p>key measures</p> <p>Assurances : Audit, data quality checks as part of performance management framework. More regular performance reporting with more time for Performance and Insight team to review data and act as a 'critical friend'</p> <p><b>Risk - Mitigating actions update</b></p> <p>Live connection between Performance Matters and the See It, Report It data from LAGAN helps show that we can provide the link between high level figures and the supporting operational level data.</p> <p>We are beginning to load operational risks onto Performance Matters to provide a more holistic look at the risk issues affecting the councils.</p>															
Shared	<b>C06</b>	<b>Member Decision Making</b>	That members do not have access to information and support to make effective decisions	4	4	16	▲	4	3	12	●	→	Jun 16	12	●
<p>Current Controls : Attendance of professionally qualified and experienced officers at all Member decision taking meetings. Business Planning meetings at Executive and Cabinet. Council Constitutions. Member Development Programmes. Legislative requirements. Call in processes. Sign off of Council/Executive/Cabinet/Committee reports by JMT member</p> <p>Assurances : No decision has been made by either Council which is inconsistent with the policy framework or legal requirements</p> <p><b>Risk - Mitigating actions update</b></p> <p>No change for Quarter 2</p>															
Shared	<b>C08</b>	<b>Safeguarding Children</b>	Failure to follow our policies and procedures in relation to safeguarding children or raising concerns about children and young people welfare	5	4	20	▲	5	1	05	★	→	Jun 16	05	★
<p>Current Controls : Safeguarding lead in place and clear lines of responsibility established. Safeguarding Policy and procedures in place Information on the intranet on how to escalate a concern Staff training - at SNC this is being rolled out using new NCC e-training module. Safer recruitment practices and DBS checks for staff with direct contact Action plan developed by CSE Prevention group as part of the Community Safety Partnership Local Safeguarding Children's Board Northamptonshire (LSCBN) pathways and thresholds Data sharing agreement with other Partners Attendance at Children and Young People Partnership Board (CYPPB) Annual Section 11 return complied for each council</p> <p>Assurances : Safeguarding champions to promote the welfare of children and be a point of contact for cascading information. Annual Audit of activity JMT and LSP also have specific actions and/or meeting times JATAC (Joint Agency Tactical and Co-Ordination Meeting) at CDC where issues of CSE are currently discussed with partner agencies.</p>															
Shared	<b>C09</b>	<b>Safeguarding</b>	Failure to:- identify safeguarding concerns and issues; use agreed protocols for escalating safeguarding concerns; use diverse community intelligence to best effect internally and externally.	4	4	16	▲	4	2	08	●	→	Jun 16	08	●
<p>Current Controls : Engagement with Joint Agency Tasking and Co-ordinating Group (JATAC) and relevant Oxfordshire County Council (OCC) safeguarding sub group. Engagement at an operational and tactical level with relevant external agencies and networks</p> <p>Assurances : The established "See It Report It" process has controls and monitoring arrangements for different levels in the organisation for assurance purposes</p>															
Shared	<b>C10</b>	<b>Communications</b>	Failures to manage internal and external communications results in reputational damage to the council or reduced performance/staff morale	4	4	16	▲	3	3	09	●	→	Jun 16	09	●
<p>Current Controls : Centralised press office function Members attributed and sign of press releases Communications strategy in place Members media training Social Media Policy Specific communications plans in place for major projects</p> <p>Assurances : SNC Members communications panel SNC Portfolio Holder for communications CDC member lead for communications Quarterly performance reporting CDC annual satisfaction survey</p>															

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includes comprehensive communications section															
<b>Risk - Mitigating actions update</b>															
Comms Panel met mid-October and weekly meetings take place with the leader who is also the portfolio holder.															
CDC meetings with leader ad hoc as and when he requires them.															
Feedback from Customer Satisfaction Survey noted - but in the main positive.															
Shared	<b>C11</b>	<b>Equalities</b>	Failure to comply with equalities legislation results in legal challenge, costs and reputation damage	4	4	16	▲	4	3	12	●	→	Jun 16	12	●
Current Controls : Rolling programme of equality assessments Equality policy and corporate plan in place Equalities requirements to be identified in service plans Equalities training available for staff and members Equalities awareness programme "Knowing our Communities" at both CDC and SNC															
Assurances : Annual update to Cabinet and Executive. Quarterly performance reporting. EIA rolling programme and action plan. Virtual steering group to co-ordinate work.															
Shared	<b>C12</b>	<b>Health and safety</b>	Failure to comply with health and safety legislation leads to injury, sickness, absence and litigation against the council	5	4	20	▲	5	2	10	●	→	Jun 16	10	●
Current Controls : Both Councils have shared policies, procedures, and arrangements in place to mitigate the risks of accidents to staff, members of the public and contractors that may be affected by the Councils actions															
Assurances : BS OHSAS 18001 Occupational Health and Safety Standard, and ISO 14001 Environmental Standard.															
CDC	<b>C13</b>	<b>Emergency Planning (EP)</b>	That plans are not in place to ensure the Council responds effectively in the event of a civil emergency and local residents are not supported. This could result in casualties, unnecessary hardship, impact on the local environment, costs and reputation.	4	3	12	●	4	2	08	●	→	Jun 16	08	●
Current Controls : Emergency plan reviewed quarterly and on activation. Team established to monitor and ensure all elements are covered. Added resilience from cover between CDC and SNC															
Assurances : Oxfordshire County Council (OCC) EP Division have accepted our EP as being sufficient and suitable. OCC have also led on desk top studies of implementation.															
<b>Risk - Mitigating actions update</b>															
Following the Public Protection restructure an Emergency Planning Liaison Officer has been appointed and is reviewing our arrangements and procedures; this will enhance the existing and lead to improvement where necessary															
Shared	<b>C15</b>	<b>ICT Transformation and Transition</b>	Failure to deliver the IT transition project programme results in failure to: <ul style="list-style-type: none"> <li>• deliver savings through IT harmonisation</li> <li>• deliver the councils' wider strategic and commercial objectives</li> <li>• reputation damage</li> <li>• improve services and deliver efficiencies</li> </ul>	4	4	16	▲	3	3	09	●	→	Jun 16	09	●



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			<ul style="list-style-type: none"> <li>• deliver the channel shift programme and enhance customer access</li> <li>• Manage business continuity</li> </ul>												
Current Controls : Current: Project plan in place Performance Management Member Governance Director as sponsor Dedicated project team and additional resource Future: New IT strategy and work plan to be developed Assurances : Audit Quarterly performance management Monthly member oversight															
Shared	<b>C16</b>	<b>Inability to download new voter registrations</b>	Cabinet Office are moving their online system to a more powerful and robust server. When the initial setup of this system took place in June 2014, connectivity tests passed ok in the dry runs. However when went live connectivity was lost and took 5 days to re-instate.	4	3	12		3	3	09		Sep-16		>>	
Current Controls : Testing of connectivity has taken place and been successful. Feedback to Cabinet Office has been given. Larger server at Cabinet Office so repeat of 2014 is unlikely. Assurances : Third party assurances from Cabinet Office <b>Risk - Update</b> New risk this quarter so Direction of travel will not display.															

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Partnership Risks																
Council	Ref.	Name	Description	Gross Impact	Gross Probability	Gross Risk		Current Impact	Current Probability	Residual Risk		Last updated	Change	Since	Previous rating	
CDC	P01	<b>Police and Crime Commissioner (PCC) - Thames Valley</b>	The Council fails to engage/influence the PCC/ PCP Doesn't add value to partnership work of the council PCC commissions projects that don't align with strategic objectives of the council. Loss/reduction of funding to Community Safety. Becomes isolated from PCC leading to failure to achieve corporate objectives and loss of reputation	3	3	09	●	2	2	04	★	Sep-16	➔	Jun 16	04	★
Current Controls : Effective local Community Safety Partnership meetings Elected member representation at Police and Crime Panels (PCP) Elected Member representation at Oxfordshire Board (OSCP) arrangements. Elected Member representation at CSP Alignment with PCC Policing Plan Elected membership in accordance with agreed PCP Steering Group Policy Assurances : PCC subject to scrutiny by PCP. CDC chair of CSP sits on PCP.																
Shared	P04	<b>South Midlands LEP (SEMLEP)</b>	The partnership doesn't add value to the work of the councils, undertakes projects that don't align with strategic objectives or the council is unable to influence the partnership's agenda.	4	4	16	▲	3	3	09	●	Sep-16	➔	Jun 16	09	●
Current Controls : Partnership Work Programme / Forward Plan, Resource provision for Partnership work, Senior management and Member Involvement Assurances : <b>Risk - Mitigating actions update</b> Close involvement by SNC and CDC in its policy development and service provision																
CDC	P05	<b>Oxfordshire LEP</b>	The partnership doesn't add value to the work of the council, undertakes projects that don't align with strategic objectives or the council is unable to influence the partnership's agenda.	4	4	16	▲	3	3	09	●	Sep-16	➔	Jun 16	09	●
Current Controls : Partnership Work Programme / Forward Plan, Resource provision for Partnership work, Senior management and Member Involvement Assurances : Portfolio briefing Growth Board Regular liaison meetings with OLEP <b>Risk - Mitigate actions update</b> CDC inputted closely into development of new SEP and in service delivery groups																
CDC	P07	<b>Safeguarding in Partnership with OCC (CDC)</b>	Failure of the new partnership arrangements results in Cherwell District Council not being able to meet its safe and healthy objectives.	3	4	12	●	3	3	09	●	Sep-16	➔	Jun 16	09	●
Current Controls : Engagement with County Council structures Oxfordshire has a clear structure and acknowledges the need for the District Council's direct contribution. Financial constraints to the delivery of the Health & Wellbeing Board action plan Assurances : Spending in localities is determined by the Board. There is limited opportunity for Districts to directly influence.																