

Appendix 2 - Risk Register

Risk Area "There is a risk that..."	Analysis of Risk "Which will result in..."	Type	Assessment of Risk (original score in brackets)			Management Actions Implemented or Planned (in bold)	Assessment of Risk after mitigations (original score in brackets)			Responsible Officer
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1. Driver shortages and workforce supply challenges in the UK waste management industry.	Increased cost, lack of treatment capacity in UK, waste stockpiling, reduced haulage options. HRRC closure, increased landfill, lack of drivers affecting collections, collected recycling treated as residual waste.	Economic	5	3	15	PPP contract with rail haulage for most of the Authority's waste provides significant protection. Lack of waste processing capacity on shore UK for materials currently shipped abroad will be mitigated UK wide by Govt planning and EA flexibility using protocols developed during the start of the covid 19 pandemic. Reserves of £2.5m are being maintained for increased costs of haulage and treatment of waste streams arising from market risks. No significant impacts have been observed to date but the situation will require ongoing monitoring. Re-procurement of haulage contracts has ensured that new contractors have strong contingency plans. Weekly service status report at Environment Director level will identify where driver levels are low and identify options to share staff if/where necessary to maintain service levels.	3	3	9	Managing Director
2. Authority decisions may be based on inaccurate or incomplete information	Inappropriate actions or decision making, unnecessary costs, challenge from an interested party, failure to meet objectives and impact on reputation	Political	5	2	10	Manage in accordance with policies and procedures, review P&Ps to ensure they are up to date and robust. Scrutiny processes in place for reporting, reviewing and checking of any financial data by Officers. Policy for handling conflicts of interest involving Members and/or Officers. Internal management team meetings, Chief Officer's meetings, Borough Partnership meetings review Authority papers. Audit Committee established with internal and external audit governance framework. Key performance indicators are reported to the Authority. Waste data is a regular area for internal audit review.	5	1	5	Managing Director
3. One or more of the waste treatment and disposal contracts will perform poorly or a single event will result in a need for business continuity planning.	Poor service to the Boroughs using the sites or needing material to be removed from site. Complaints about nuisance e.g. odour or pests. Increased cost of handling materials	Political	4 (5)	4 (2)	16 (10)	Ongoing review of contingency arrangements on each contract quarterly / annually as required. An additional transfer station in the PPP contract provides additional contingency arrangements. Ability to direct deliver to Lakeside. Maintain good relationships with alternative waste offtakers, enabling emergency procurement or fast procurement via Dynamic Purchasing System (DPS). Ensure key potential off takers are registered on the DPS. Plan waste flows well in advance of foreseeable events. Holding regular meetings with contractors and monitor KPIs as appropriate. Regular communication with Boroughs about service issues. Service monitoring and market information, reports on credit changes monitored. Credit checks and a review of accounts are routinely undertaken for new contracts and considered for contract extensions.	3 (5)	2 (1)	6 (5)	Head of Service Delivery
4. WLWA financial processes are not robust	Internal fraud by an employee or contractor, bad information resulting in wrong decisions	Economic	5 (4)	2	10 (8)	Internal audit plan in place. Policies and procedures in place including arrangements for checking contracts and invoices. Segregation of duties between authorisation and checking of payments. Robust arrangements in place to control payments. Register of assets maintained. Processes in place for the monitoring of ad hoc contracts, contract management and negotiations. Whistle blowing policy. Standing Orders. Procurement scrutinized jointly by senior management team and declarations of interest extended to all staff. Cash facilities removed completely and card procedures reviewed.	4	1	4	Finance Director
5. There will be unforeseen financial costs not covered by balances	An in-year levy to the Boroughs	Economic	4	3	12	Budget processes reviewed and monthly reporting demonstrating performance. Budgets built from the bottom up with input and validation of data from boroughs. Boroughs pay for PAYT collected tonnes essentially bearing the risk for variances. Prudent levels of reserves are maintained to act as a buffer against any unforeseen risks and financial costs. Excess reserves are returned to boroughs. Budget plan takes into account quantifiable risks. Where appropriate budgets are set with contingencies for identified risks.. In response to Covid-19 wasteflows are being monitored on a weekly basis and a range of reports are provided to stakeholders to help collectively manage the financial risk. Boroughs have received government funding to help with additional costs during the time of the pandemic. However there is no such commitment going forwards and boroughs are facing ongoing cost pressures as a result of the pandemic.	3	1	3	Finance Director
6. WLWA insurance cover will be insufficient	Inadequate cover to meet the costs of future claims, increasing difficulty in obtaining competitive quotes for waste industry facilities	Economic	5	3	15	There is an annual review with brokers and insurers to review adequacy of policies, claims history and premiums and options. Regular updates from insurer and broker advising of new policies. Recent insurance procurement has shown that it is increasingly difficult to attract insurers to bid for the provision of cover. Therefore reserves will be built up to deal with loss of any insurance cover in coming years and advice will be sought regarding self insurance options.	5	1 (2)	5 (10)	Finance Director
7. Funds (cash) are not managed effectively	Insufficient readily accessible cash to meet spending commitments resulting in financial penalties, legal claims and poor reputation. Poor rate of return on investments.	Economic	4	4	16	Cash planning is in place. Processes in place to make payments swiftly, within minutes if necessary. Cash balances maintained to cover delays in borough transactions. 3 day turnaround time for calling down funding from investments. Placement facility to deliver better returns. Opportunities to improve returns are reported to Chief Officers/Authority e.g. office procurement, transfer station purchase. In response to Covid-19 and as a precaution cash is held in readily accessible funds and not committed for long-term, should the need for it arise.	3	1	3	Finance Director
8. The contract payment mechanisms are not properly understood or ambiguous	Payment delays, under or overpayments or disputes	Economic	5 (4)	3	15 (12)	In-house checks of invoices by both operational and financial managers in place. Independent audit of contractor's payment model. In depth contract knowledge of Sharpe Pritchard solicitors and key Authority managers. Monthly contract meetings, training and familiarisation with payment mechanisms. Periodic billing file audits	4 (5)	2 (1)	8 (5)	Finance Director
9. IT systems are insecure or suffer a major failure and will face cyberattack	Loss of data which we are obliged to report, or without which we cannot invoice or operate effectively	Economic	4 (5)	4	16 (20)	There are no systems running on local servers/ we do not have any servers. ICT services are out sourced and subject to a wide range of back-up and security measures including remote storage and performance to an agreed service level standards. Service providers deploy a range of security measures to prevent unauthorized access to systems including 2 factor authentication, firewalls, antivirus and antispysware. These	4	1	4	Finance Director

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						are in addition to the fundamental underlying control of restricting access to kit communications and applications to authorised users only which both service providers and we operate. An IT strategy is in place and IT requirements are regularly reviewed.				
10. WLWA Borough data is not being viewed holistically	A disjointed approach. Failure to capitalise on opportunity. Additional cost. A continuing disjointed approach. The Boroughs will fail to meet the 65% recycling composting target by 2030	Technological	5	3	15	Data is viewed from an Authority perspective and ensures operations are effective for the Authority.. Projects identified in the Business plan aim to provide a fuller picture. The Authority has had a key role in working with boroughs to share data and resources in response to the Covid-19 crises and in understanding the risks. A more collaborative and holistic approach is developing with regular dialogue and engagement across constituent boroughs. A self-service data portal has been rolled-out and borough colleagues given guidance. Further engagement with boroughs will be ongoing with the strength of more analysis and information being routinely developed	4	2	8	Finance Director
11. There will be a change in law relevant to our contracts	Unanticipated cost for the Authority	Legislative	4	4	16	Legislative changes are identified i.e. which affect EfW or transfer station operations, an incineration tax or change in classification to hazardous waste and are prepared for accordingly. Networking with contractors and public sector bodies on expected changes to follow the Resources and Waste Strategy. Nawdo, Lednet and Widp meetings. Where possible costs will be built into the budgeting process or reported through budget monitoring and dealt with through reserves.	4	2	8	Head of Service Delivery
12. Environmental damage will be caused by Authority or Contractor Activities	Increased cost of repair, potential fines, reputational damage	Environmental	5	2	10	Range of processes including internal daily and weekly monitoring. Review operations risks. Review procurement policy. Monitor contractor's environmental performance and reporting. West London wide and Authority level Carbon projects are underway identifying and commencing actions to reduce the carbon footprint.	5	1	5	Operations Manager
13. There will be a breach in Health & Safety at an Authority or Contractor site	Risk of injury to staff or public visitors to Authority sites	Environmental	5	2	10	Specialist Health and Safety Advice contracted in. Periodic internal audit assurance. Annual Action Plans are considered and agreed with GMB. Monitor contractors' health and safety performance and reporting. Regularly test and review fire prevention/precaution measures at site including fire risk assessments. Losses are covered by insurance policies.	5	1	5	Operations Manager
14. Covid-19 – staff or contractors are infected by Covid-19 or required to self isolate	Death or serious illness of staff or family members. Failure or restricted capacity of sites leading to accumulation of waste within the system. Less waste is recycled leading to higher costs and environmental impacts.	Environmental	4	5	20	<p>Sites and contractors – at all times:</p> <ul style="list-style-type: none"> Introduce safety standards and safe systems of work and keep them under constant review, including site indoor and outdoor layout changes to facilitate safe distancing, temporary role changes, supply of PPE, improved signage for public, training and tool box talks, H&S risk assessments, implementing a Covid testing programme for staff. Establish a forum for communicating with Boroughs and contractors about the impact of the illness on their operations and identifying resource-sharing opportunities. Agree consistent policies with Boroughs and contractors for scaling back services if necessary. A booking system is in place to control throughput at Abbey Rd and 5 Borough sites If levels of illness/self-isolation are expected to increase rapidly: Reduce waste stocks at transfer stations to maximise site capacity before illness spreads significantly. Negotiate a temporary increase in storage capacity from the Environment Agency. <p>If Boroughs need to increase the length of the working day to complete rounds:</p> <ul style="list-style-type: none"> Extend opening hours at transfer stations to accept additional out of hours waste. <p>In the event of significant staff sickness levels:</p> <ul style="list-style-type: none"> Available office-based staff to cover non-specialist operational roles, e.g. weighbridge and HRRC operative at Abbey Road Use available staff to support Borough or contractor front-line services on a highest-priority-first basis. Work with Borough Env Directors, other Boroughs and contractors to create a shared pool of drivers and make use of existing frameworks. Status check-ins from Boroughs, WLWA, and key contractors via the 'West London Strategic Waste Group' Whatsapp group daily (or other specified frequency) Completion of the 'Service Status Tracker' spreadsheet by Boroughs and WLWA weekly (or other specified frequency). WLWA to summarise the service status from the above sources and circulate an updated 'Waste Service Status report' to Heads of Service, Environment Directors and WLWA Councillors weekly (or other specified frequency). <p>In the case of transfer stations being unable to accept waste:</p> <ul style="list-style-type: none"> Deliver contingency tipping plan Change site operations/layout at Abbey Road to allow it to accept greater quantities of diverted wastes Review contractual positions <p>West Drayton</p> <ul style="list-style-type: none"> Close the office for non-essential use, all West Drayton based employees to work from 	4	3	9 (12)	Managing Director

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						home and essential access is by appointment only and strictly controlled by an office manager with appropriate safe distancing, equipment and cleaning arrangements <ul style="list-style-type: none"> • Tool box talks have been provided, home working risk assessments been undertaken, equipment provided and H&S risk assessment. • Follow government guidance, and update risk assessments as the threat level and guidance changes. Waste Minimisation <ul style="list-style-type: none"> • Temporary stoppage of face to face community events which includes the running of reusable nappies and the implementation of food waste recycling at schools. • Move to on-line and e-commerce activities for reuse • Reduce HRRC usage by prioritizing bulky waste collection improvement projects 				
15. The Environment Bill will lead to increased costs and significant change to the way the Authority operates	Legislation principally in relation to waste will result in significant change within the waste sector and operations. The impact of legislation in other areas covered by the Environment Bill not expected to have a significant impact for the Authority (i.e. clean air, water, landscapes and wildlife legislation)	Political	3	4	12	<ul style="list-style-type: none"> • Leading borough wide consideration of Resource and Waste Strategy and consultation responses • MD role in national forums to provide early indication of direction of travel • Ongoing analysis of data, requirements, opportunities and impacts • Preparation, wider engagement and planning for change • Input and engagement with borough EDs and FDs to keep abreast of west London picture • Ongoing monitoring of detail and opportunities for funding of services (e.g. EPR) 	1	4	4	Managing Director
16. New partners in Circular Economy work may create new risks	Partner organisations may be small or new and have less developed controls resulting in risks of failure resulting in principally reputational or to a lesser extent financial implications for the Authority. In developing the market for circular economy small scale or trial services may not be sustainable longer term or cease at short notice.	Political	3	3	9	<ul style="list-style-type: none"> • Undertaking appropriate research and vetting of the business and key individuals to properly understand the partner organisation / partnering risks • Leading on the development of processes and controls (including risk assessments) for the service offering to ensure appropriate controls are implemented to manage the operation and risk it entails, • Maintaining a stakeholder map for alternative providers • Benchmarking potential partners to assess benefit vs sustainability • Stress testing of partner business cases (financial and environmental) • Dynamic comms for the provision of services ensuring service information is near live where possible. 	2	2	4	Project Director
17. Risks and opportunity costs identified at March strategy day	A variety of new legislation will impact the Authority and boroughs. This includes legislation for <ul style="list-style-type: none"> • Extended Producer Responsibility (EPR) • Deposit Return Scheme (DRS) • Consistency • Emissions Trading Scheme (ETS) • Climate Emergency / Net Zero These could for example result in boroughs having to make changes to their collection systems (Consistency) or there could be a pass thorough of essentially a new financial burden from energy production (ETS)	Legislative	5	4	20	<ul style="list-style-type: none"> • Participation in national, regional forums and collectively to try and influence government thinking and have early sight of any plans • West londonwide collaboration to respond consistently to government consultations regarding change in legislation • Building business knowledge of proposed legislative change options being considered and understanding the impacts • Building jointly with boroughs a new WLWA strategy to mitigate any risk and maximize any opportunities • Sharing the knowledge with partners, building awareness and working collaboratively to respond to the challenges • As legislation develops and becomes clearer, reporting to members the implications and options for consideration and making recommending accordingly 	3	5	15	Managing Director
18. Industrial Action may take place on the railways for an extended period of time	<ul style="list-style-type: none"> • More export of waste by road, leading to: <ul style="list-style-type: none"> ○ Higher haulage costs ○ Greater environmental impacts from road haulage ○ Tipping delays caused by the need to load road haulage vehicles on site • Boroughs needing to tip at alternative locations if not enough waste can be exported by road. See Risk Error! Reference source not found. for potential impacts) • Reduced income from third party waste if the sites are forced to accept less waste • Accumulation of waste on-site leading to: <ul style="list-style-type: none"> ○ Odour ○ Pests ○ Reputational damage ○ Legal costs 	Political	5	4	16	<u>SUEZ</u> <ul style="list-style-type: none"> • Maximise waste storage capacity at Victoria Road and Transport Avenue: <ul style="list-style-type: none"> ○ Projects to increase capacity of sites, trains and SERC ○ Maximise on-site storage space for containers ○ Increase numbers of empty containers available on sites • Have space readily available to enable bulking larger quantities of waste for road haulage • Stop third party waste inputs • Have haulage contractors available at short notice for providing road transport to disposal points • Identify alternative residual waste outlets within the region • If necessary identify further alternative tipping points for Boroughs and inform WLWA <u>WLWA</u> <ul style="list-style-type: none"> • Increase inputs to Lakeside • Identify and maintain dialogue with alternative disposal outlets within the region, and use emergency procurement or DPS to arrange temporary contracts if necessary. • Temporarily change site operations/layout at Abbey Road to allow it to accept greater quantities of diverted wastes on the Transfer Station • If it's necessary to divert Boroughs to other sites, implement the contingency tipping plan. • Review contractual positions 	3	4	12	Head of Service Delivery

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Risk/ Impact Rating

Rating	Status	Service disruption	Financial Loss	Reputation	Failure to provide statutory service / meet legal obligations	People
5	Extreme	Total failure of service	Over £5m	National publicity > than 3 days Resignation of leading member or chief officer	Multiple civil or criminal suits. Litigation, claim or fine of above £5m	Fatality or one or more clients/staff
4	Very high	Serious disruption to service	£500k-£5m	National public or press interest	Litigation claim or fine £500k-£5m	Serious injury. Permanent disablement of one or more clients / staff
3	Medium	Disruption to service	£50k-£500k	Local public /press interest	Litigation claim or fine £50k-£500k	Major injuries to individual
2	Low	Some minor impact on service	£5k-£50k	Contained within department	Litigation claim or fine £5k-£50k	Minor injuries to several people
1	Negligible	Annoyance but does not disrupt service	< £5k	Contained within unit/section	Litigation claim or fine less than £5k	Minor injuries to an individual

Likelihood Classification

1. Rare - May occur only in exceptional circumstances (0-5%)
2. Unlikely- Could occur at some time (6%-20%)
3. Possible - likely to occur (21%-50%)
4. Likely-Will probably occur in most circumstances (51%-80%)
5. Almost Certain - Expected to occur in most circumstances >80%)

Risk Rating/Scoring = Impact x likelihood. Prioritisation of Risks

20-25 (Red)	Those risks requiring immediate management and monitoring
9-19 (Amber)	Those risks requiring management and monitoring but less time critical
1-8 (Green)	Those risks which require ongoing monitoring