

CIVIL CONTINGENCIES POLICY BRANCH 2020-21

Risk Register v1

CIVIL CONTINGENCIES POLICY BRANCH

AIM

'To encourage effective emergency preparedness; support emergency response through delivery of government's central crisis management arrangements; and work with key partners to strengthen NI resilience, primarily through the work of the Civil Contingencies Group (NI) led by HOCS.'

Impact ↑	5	<u>RISKS</u>
	4	1. CCD's co-ordination arrangements do not effectively provide the necessary information to the Executive to inform the management of the on-going Covid-19 situation whilst dealing concurrently with the impacts of the UK withdrawal from the EU.
	3	2. CCPB fails to support and strategically lead arrangements for CCG (NI) in the event of a serious civil contingency.
	2	3. CCPB does not have sufficient staff with the required level of knowledge, skills and associated resource to meet critical business needs
	1	4. CCPB is at risk of being in breach of NICS/Cabinet Office information governance and physical security obligations.
		5. CCPB fails to operate within allocated budget: avoiding overspend and managing underspend within 1.5% target.
		6. CCPB's suite of protocols and guidance documents are not fit for purpose or user friendly.
		7. CCPB is unable to support the escalation and stand up of the NIHub and its subsequent day to day operation in times of a developing emergency/crisis in NI.
		action/monitoring

Key Risks Summary

Risk		Risk Type	Residual Risk Q2			Residual Risk Q3			Residual Risk Q4		
Risk No.	Description		Likelihood	Impact	Assessment	Likelihood	Impact	Assessment	Likelihood	Impact	Assessment
Operational Risks											
1	Co-ordination arrangements do not effectively provide the necessary information to the Executive to inform the management of the on-going Covid-19 situation whilst dealing concurrently with the impacts of the UK withdrawal from the EU and winter preparedness.										
2	Failure to support and strategically lead arrangements for CCG (NI) in the event of a serious civil contingency.										
3	CCPB does not have sufficient staff with the required level of knowledge, skills and associated resource to meet critical business needs										
Corporate Risks											
4	CCPB is at risk of being in breach of NICS/Cabinet Office information governance and physical security obligations.										
5	Operate within allocated budget: avoiding overspend and managing underspend within 1.5% target.										

Risk		Risk Type	Residual Risk Q2			Residual Risk Q3			Residual Risk Q4		
Risk No.	Description		Likelihood	Impact	Assessment	Likelihood	Impact	Assessment	Likelihood	Impact	Assessment
6	CCPB's suite of protocols and guidance documents are not fit for purpose or user friendly.										
7	CCPB unable to support the escalation and stand up of the NIHub and its subsequent day to day operation in times of a developing emergency/crisis in NI.										

RISKS FOR WHICH ASSURANCE IS TAKEN FROM AND MANAGED IN TEO RISK REGISTER

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RISK TYPE

- A. Risk is being managed effectively with a view to reducing the key risk assessment.
- B. Responsible officials required to take additional action, over and above the Controls and mitigating actions.
- C. Risk is cannot be managed and is not manageable at a branch level (will always be "Red").

RISK 1 – CCD’s co-ordination arrangements do not effectively provide the necessary information to the Executive to inform the management of the on-going Covid-19 situation whilst dealing concurrently with the impacts of the UK withdrawal from the EU and winter preparedness.			
Primary Causes		Current and planned actions to manage the risk	
<ul style="list-style-type: none"> • Difficulty in managing critical information flows across the public sector in NI. • Lack of engagement/liaison with and by Departments & multi-agency partners. • Low level of operational preparedness in some sectors to deal with concurrent issues. • Lack of availability of sufficient staff within CCD/NIHub with the relevant knowledge, skills and experience to deal with a critical event. • Complex and competing information demands, at both NI and UK 		<ul style="list-style-type: none"> • Implementation of the EY C3 COVID-19 Response Lessons Learned Review. • New NIHub escalation model agreed by the Executive to better inform and explain process of escalation and de-escalation of NIHub and levels of response as incident(s) develop • Process for the recruitment of additional full time staff into CCD progressing to increase business area capacity. • Refresh of the Departmental C3 (including JESIP Partners) relationships underway with revised ToR in place and more regular & routine engagement across the NICS. • Winter preparedness 2020 perpetrations underway with attendance at UK wide exercises (Cabinet Office led) • CCG(NI) meeting schedule specifically to address issue on concurrency of impacts in Oct 2020.Ongoing engagement with C3 leads and external partners on departmental preparedness and operational plans. • 	
Consequences			
<ul style="list-style-type: none"> • The effectiveness of the strategic central government response to a civil emergency is compromised. • Public Health response compromised • Potentially significant damage to infrastructure, the economy and/or the environment. • Reputational damage to TEO, NICS, Ministers and the NI Executive, poor reflection on NI to the rest of the UK • Critical work cannot be taken forward due to a lack of resources both in terms of staff and money. 			
Risk Assessment (after current and planned actions)	Impact	Likelihood	Overall Risk Assessment
			
Business Plan Objective(s)	TFP		
Risk Owner	Andy Cole		
Responsible Officer(s)	Mark McGuicken		

RISK 2 – CCPB fails to support and strategically lead arrangements for CCG (NI) in the event of a serious civil contingency.

Primary Causes

- Lack of central co-ordination of the strategic preparedness agenda.
- Lack of engagement with and by multi-agency partners.
- Low level of operational preparedness due to completing work pressures
- Lack of availability of sufficient staff within CCPB with the relevant knowledge, skills and experience to deal with an emergency (staff turn-over).

Consequences

- Failure of CCG(NI) to react to serious incidents quickly enough and with sufficient data to make early critical decisions
- Lack of support/understanding of NICCMA from partner organisations leading to a dis-jointed response to serious incident
- Lack of support from other NICS Depts due to perception of ineffectiveness of CCPB – break in relationship with C3 leads and JESIP partners

Current and planned actions to manage the risk

- Tri-annual meetings (routine) of the Civil Contingencies Group (NI) (CCG(NI), the principal civil contingencies strategic preparedness body for NI chaired by HOCS.
- Complete actions appropriate to CCPB from EY lessons learned review into COVID-19 initial response.
- NI Hub – infrastructure established and in place, the lessons learned report from initial COVID-19 response will ensure that continuous improvement process is on-going.
- Testing of operational preparedness to ensure that TEO can put the necessary strategic response structures in place quickly have been successful for EU exit preparation.
- Training plan for all CCPB staff being developed.
- Funding – Business case for additional staff secured and filling of posts has been commenced
- Exercising of NI Hub to be conducted with long term aspiration to regularly exercise/familiarise the running of Civil Contingencies response in NICS and wider
- Approval of revised escalation/de-escalation arrangements for NI Hub

Risk Assessment	Impact	Likelihood	Overall Risk Assessment
(after current and planned actions)			
Business Plan Objective(s)	TFO		
Risk Owner	Andy Cole		
Responsible Officer(s)	Mark McGuicken		

RISK 3 – CCPB does not have sufficient staff with the required level of knowledge, skills and associated resource to meet critical business needs.			
Primary Causes		Current and planned actions to manage the risk	
<ul style="list-style-type: none"> • Sufficient staffing resources not available to carry out necessary minimum work and simultaneously implement improvements in business delivery. • High level of staff churn (at Staff Officer grade up to G5 level in past 12 months has led to a significant drain on corporate knowledge and experience in Civil Contingencies in the Division • Historically under staffed work area in TEO • Complex, cross-cutting area of work that is unique within NICS, staff require regular and constant Professional Development to remain current and suitably qualified 		<ul style="list-style-type: none"> • Utilising the PWC review into CCPB capability/capacity the resultant staff structure is being sought • Business case has been drafted and approved for additional staff resource • Additional staff resources also being sought from within NICS/public sector if possible. • Elective transfers for AO and DP (within existing complement in CCPB) have commenced. • Use of Agency staff to fill stop gaps at AO grade • CCPB to develop and resource a staff training plan and induction process to ensure staff remain current, competent and qualified for role. • Engagement with the Emergency Planning College on the development of training programme for CCPB • Development of 'buddy' system with staff in Scotland and Wales Resilience Teams for new CCPB staff 	
Consequences			
<ul style="list-style-type: none"> • Critical work cannot be taken forward due to a lack of staff and staff training/experience in Civil Contingencies. • The effort in time of money and resources spent on EU exit preparedness/Covid -19 response are wasted. • Inability to fully implement recommendations or review outcomes due to BAU workload on undermanned team, no improvement in delivery. • Reliance on external contractors to deliver Civil Contingency response • Unable to take forward necessary engagement with local delivery partners, JESIP organisations and Whitehall departments. • Insufficient experienced staff to engage in local and national resilience exercises. 			
Risk Assessment (after current and planned actions)	Impact	Likelihood	Overall Risk Assessment
			
Business Plan Objective(s)	TFO		
Risk Owner	Andy Cole		
Responsible Officer(s)	Mark McGuicken		

RISK 4 – CCPB is at risk of being in breach of NICS/Cabinet Office information governance and physical security obligations.

Primary Causes		Current and planned actions to manage the risk	
<ul style="list-style-type: none"> • Reduced staffing resources over several years resulting in inexperienced staff managing file structures. • High level of churn (NIHub) of staff accessing and using sensitive, protectively marked Civil Contingencies information & data and proper information governance procedures not being followed. • Large volumes of information flowing through CCG(NI), NIHub and CCD and inability to capture key information and recording of key decisions due to small numbers of staff and unfamiliarity of work area. • Cyber security risk. • Inadequate management of corporate information (including personal and sensitive personal information under the Data Protection Act 1998 and GDPR). • Non-compliance with the Freedom of Information Act 2000. • Inadequate preparation for the implementation of General Data Protection Regulation (GDPR). 		<ul style="list-style-type: none"> • Ensure all CONOPS & SOPS produced to support the secure operation (physical and records) of NI Civil Contingency response • Adherence to the departmental policies and guidance on data management storage/security. • Adherence to the requirements of the department’s disposal schedule. • Attendance at seminars/information events on information security. • Ensure strict adherence to the clear desk policy and that staff ‘sweep’ offices at end of each day. • Staff to each take responsibility for their own record management and document security/storage. • New CCPB file plan being developed to simplify record management. • Undertake exercise to clear backlog of documentation to be saved on Trim. • Implement revised procedures to ensure individual staff take personal responsibility for document management activities. 	
Consequences			
<ul style="list-style-type: none"> • Reputational damage – public and political criticism. • Regulatory action taken by ICO against TEO • Inability to retrieve information leading to poor evidential basis for policy development, decision making and accountability purposes. • Sanction and reduction in information sharing from critical partners (Cabinet Office, PSNI etc) due to inability to control and manage securely 3rd party information/data 			
Risk Assessment (after current and planned actions)	Impact	Likelihood	Overall Risk Assessment
			
Business Plan Objective(s)	TFO		
Risk Owner	Andy Cole		
Responsible Officer(s)	Mark McGuicken		

RISK 5 – Failure to operate within allocated budget: avoiding overspend and managing underspend within 1.5% target

Primary Causes

- Constrained public expenditure context and the likely decision to protect certain departments.
- Novel and fast moving Civil Contingency emergencies require the rapid allocation of resources or awarding of contracts to facilitate/support the Executive response.

Current and planned actions to manage the risk

- Ongoing budgetary management to ensure maximum VFM in discretionary spend.
- Liaison with Finance Division in re-profiling exercises and Monitoring Rounds.
- Robust financial management/governance in place to maximise VFM and to prioritise expenditure effectively.
- Regular expenditure reviews in branch.

Consequences

- Unable to meet objectives regarding operational readiness to respond.
- Unable to resource adequate training needs for the Branch
- Unable to meet statutory requirements regarding maintenance repair of the former RGHQ site.
- Reputational damage.

Risk Assessment	Impact	Likelihood	Overall Risk Assessment
(after current and planned actions)			
Business Plan Objective(s)	TFO		
Risk Owner	Andy Cole		
Responsible Officer(s)	Mark McGuicken		

RISK 6 – CCPB’s suite of protocols and guidance documents are not fit for purpose or user friendly.

Primary Causes		Current and planned actions to manage the risk		
<ul style="list-style-type: none"> Reduced staffing resources over a sustained period (years) resulting in no capacity to consider revision or apply/implement strategic review to CCPB protocols and guidance. Due to high level of staff churn at middle and senior manager level, insufficient appropriate experience or expertise to conduct review of protocols/legislation/guidance exists within CCD Civil Contingencies Act 2004 no longer fit for purpose and reflective of Civil Contingencies/Resilience environment Workloads associated with YELLOWHAMMER/EU Exit and then COVID-19 response absorbed all capacity in CCPB to conduct deep dive reviews into protocols/guidance and legislation 		<ul style="list-style-type: none"> Continue with the completion of outstanding actions in the CCPB Work Programme as agreed at CCG(NI) Initiate a work programme to commence preparatory work to complete a regional Security Risk Assessment for NI in 20/21 Complete and sign off updated CONOPs and SOPS for the NIHub Complete desktop review of protocols and guidance to agree prioritisation of review process going forward. Update protocols and emergency planning documentation. 		
Consequences				
<ul style="list-style-type: none"> Guidance and protocols out of date and no longer fit for purpose in many cases. Reputational risk for TEO as other partner organisations have updated and developed new process/procedures in same timeframe. Legislative and policy framework is outdated and requires amendment. Local (Regional) Risk Assessments out of date and no longer applicable 				
Risk Assessment (after current and planned actions)	Impact	Likelihood	Overall Risk Assessment	
				
Business Plan Objective(s)	TFO			
Risk Owner	Andy Cole			
Responsible Officer(s)	Mark McGuicken			

RISK 7 – CCPB unable to support the escalation and stand up of the NI Hub and its subsequent day to day operation in times of a developing emergency/crisis in NI.

Primary Causes		Current and planned actions to manage the risk		
<ul style="list-style-type: none"> Failure to retain enough volunteers for a future NI Hub Stand up Failure to have IT systems operational in time for a future Hub stand Up Failure to have identified 2 additional locations for the NI Hub CONOPS and SOPs not ready for future NI Hub Stand Up No Data Analytics provision available for NI Hub Failure to establish adequate records management systems Failure to provide timely training to returning volunteers Failure to engage with stakeholders on escalation principles 		<ul style="list-style-type: none"> Survey existing volunteers and seek additional staff as required. Update induction materials and arrange regular volunteer exercises Rationalise existing laptop stock and undertake regular testing of IT Identify alternative civil service locations for future stand ups and undertake risk assessment for these locations Develop new conops and sops Extend existing EY contract Draft specification for data analytics tender being developed and NI Hub data requirement included Undertake engagement with Departments on cabinet office data returns to see if they could complete them Set up new trim file plan structure for future standup and review google file plan Review exiting training packages to ensure they align with revised Hub structure Provide new content to LINKS team Seek approval from HOCS/NICS Board for revised escalation model Brief key stakeholders 		
Consequences				
<ul style="list-style-type: none"> Unable to respond to concurrent emergencies in a timely manner Inability of NICS to respond to Whitehall requirements for Covid-19 or EU Exit operational hub standup NIHub slow to set up and information flows from stakeholders interrupted or mismanaged having implications of strategic issue decision making Credibility of CCPB and by extension TEO damaged and loss of confidence across depts and Civil Contingencies Stakeholders Reputational damage for CCPB/TEO/NICS 				
Risk Assessment (after current and planned actions)	Impact	Likelihood	Overall Risk Assessment	
				
Business Plan Objective(s)	TFO			
Risk Owner	Andy Cole			
Responsible Officer(s)	Alison Clydesdale			

1. RISK/IMPACT EVALUATION – IMPACT

DESCRIPTOR	FACTORS TO CONSIDER TO AID ASSESSMENT
Low	Little or no impact on achievement of key objective(s); or £10,000s lost; or minor non-compliance issues; or minor delay in timing.
Medium	Some impact on achievement of key objective(s); or £100,000s lost; or local media attention; or NIAO criticism.
High	The failure of key objective(s); or regional/national media attention; or £1,000,000s lost; or critical attention from Assembly/PAC; or death.

2. RISK/IMPACT EVALUATION – LIKELIHOOD

DESCRIPTOR	FACTORS TO CONSIDER TO AID ASSESSMENT
Low	May occur only in exceptional circumstances
Medium	Could occur at some time
High	Is expected to occur in most circumstances

3. OVERALL ASSESSMENT:

Impact	High			
	Medium			
	Low			
		Low	Medium	High
Likelihood				