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DATE: 9 January 2026

To: Members of the
EXECUTIVE, RESOURCES AND CONTRACTS POLICY DEVELOPMENT AND SCRUTINY COMMITTEE

Councillor Simon Fawthrop (Chairman)
Councillor Shaun Slator (Vice-Chairman)
Councillors Jeremy Adams, Mark Brock, David Cartwright QFSM, Robert Evans, Adam Jude Grant, Julie Ireland, Simon Jeal, Ruth McGregor, Alexa Michael, Tony Owen, Mark Smith and Melanie Stevens

A meeting of the Executive, Resources and Contracts Policy Development and Scrutiny Committee will be held Bromley Civic Centre, Churchill Court, 2 Westmoreland Road, Bromley, BR1 1AS on **MONDAY 19 JANUARY 2026 AT 7.00 PM**

TASNIM SHAWKAT
Director of Corporate Services & Governance

Copies of the documents referred to below can be obtained from
<http://cds.bromley.gov.uk/>

PART 1 AGENDA

Note for Members: Members are reminded that Officer contact details are shown on each report and Members are welcome to raise questions in advance of the meeting.

STANDARD ITEMS

- 1 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS**
- 2 DECLARATIONS OF INTEREST**
- 3 QUESTIONS FROM COUNCILLORS AND MEMBERS OF THE PUBLIC ATTENDING THE MEETING**

In accordance with the Council's Constitution, members of the public may submit one question each on matters relating to the work of the Committee. Questions must have been received in writing 10 working days before the date of the meeting.

Questions seeking clarification of the details of a report on the agenda may be accepted within two working days of the normal publication date of the agenda – by **5pm on Tuesday 13 January 2026.**

a QUESTIONS FOR THE CHAIRMAN OF EXECUTIVE, RESOURCES AND CONTRACTS PDS COMMITTEE

b QUESTIONS FOR THE RESOURCES, COMMISSIONING AND CONTRACTS MANAGEMENT PORTFOLIO HOLDER

4 MINUTES OF THE EXECUTIVE, RESOURCES AND CONTRACTS PDS COMMITTEE MEETING HELD ON 24 NOVEMBER 2025 (EXCLUDING EXEMPT ITEMS) (Pages 5 - 16)

5 MATTERS OUTSTANDING AND WORK PROGRAMME (Pages 17 - 20)

6 FORWARD PLAN OF KEY DECISIONS (Pages 21 - 28)

HOLDING THE EXECUTIVE TO ACCOUNT

7 SCRUTINY OF THE RESOURCES, COMMISSIONING AND CONTRACTS PORTFOLIO (Pages 29 - 32)

- Leader of the Council
- Deputy Leader and Portfolio Holder for Children, Education & Families
- Portfolio Holder for Renewal, Recreation and Housing

8 PRE-DECISION SCRUTINY OF EXECUTIVE REPORTS

Members of the Committee are requested to bring their copy of the report pack for the Executive meeting on 21 January 2026:

The Executive, Resources and Contracts PDS Committee will be looking at the following items on the Executive Agenda:

- Draft Budget and Update on the Council's Financial Strategy
- Transformation Report 2024-2028 Two Year Progress Report 2025-26
- Notice of the Urgent Award of a Contract for the Direct Payment Support Service (**PLEASE NOTE:** This is a "to note" report. If Members of the Committee wish to discuss this item, please inform the Democratic Services Officer by 12 noon on Friday 16 January 2026)

9 POLICY DEVELOPMENT AND OTHER ITEMS

a REFERRAL FROM RRH PDS: EMPTY HOMES_ (Pages 33 - 42)

b PROCUREMENT: SUPPORTING SMALL BUSINESSES_ (Pages 43 - 58)

c RISK REGISTER_ (Pages 59 - 76)

PART 2 AGENDA

10 LOCAL GOVERNMENT ACT 1972 AS AMENDED BY THE LOCAL GOVERNMENT (ACCESS TO INFORMATION) (VARIATION) ORDER 2006, AND THE FREEDOM OF INFORMATION ACT 2000

The Chairman to move that the Press and public be excluded during consideration of the items of business listed below as it is likely in view of the nature of the business to be transacted or the nature of the proceedings that if members of the Press and public were present there would be disclosure to them of exempt information.

Items of Business

Schedule 12A Description

11 PART 2 APPENDIX MATTERS OUTSTANDING AND WORK PROGRAMME (Pages 77 - 78)

Information relating to the financial or business affairs of any particular person (including the authority holding that information)

12 PRE-DECISION SCRUTINY OF EXEMPT EXECUTIVE REPORTS

The Executive, Resources and Contracts PDS Committee will be looking at the following items on the Executive Agenda:

- PART 2: Notice of the Urgent Award of a Contract for the Direct Payment Support Service
(**PLEASE NOTE:** This is a “to note” report. If Members of the Committee wish to discuss this item, please inform the Democratic Services Officer by 12 noon on Friday 16 January 2026)

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EXECUTIVE, RESOURCES AND CONTRACTS POLICY DEVELOPMENT AND SCRUTINY COMMITTEE

Minutes of the meeting held at 7.00 pm on 24 November 2025

Present:

Councillor Simon Fawthrop (Chairman)
Councillor Shaun Slator (Vice-Chairman)
Councillors Jeremy Adams, Mark Brock,
David Cartwright QFSM, Robert Evans, Kira Gabbert,
Adam Jude Grant, Julie Ireland, Simon Jeal,
Ruth McGregor, Alexa Michael, Tony Owen and
Mark Smith

Also Present:

Councillor Yvonne Bear, Portfolio Holder for Renewal, Recreation and
Housing
Councillor Kate Lymer, Portfolio Holder Children, Education and
Families

Councillor Melanie Stevens (attended virtually)

49 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS

There were no apologies for absence.

50 DECLARATIONS OF INTEREST

There were no additional declarations of interest.

51 QUESTIONS FROM COUNCILLORS AND MEMBERS OF THE PUBLIC ATTENDING THE MEETING

There were no questions.

52 MINUTES OF THE EXECUTIVE, RESOURCES AND CONTRACTS PDS COMMITTEE MEETING HELD ON 9 OCTOBER 2025 (EXCLUDING EXEMPT ITEMS)

The minutes of the Executive, Resources and Contracts PDS Committee meeting held on 9 October 2025 (excluding exempt information), were agreed and signed as a correct record.

**53 MATTERS OUTSTANDING AND WORK PROGRAMME
Report CSD25117**

The report dealt with the Committee's business management including matters outstanding from previous meetings and the proposed work plan for the remainder of the year.

A Member highlighted that they had not received any response to a further query raised regarding the RAAC review. It was agreed that this would be followed up after the meeting, and the Assistant Director for Strategic Property would be asked to provide a response.

The Chairman reported the following updates to the work Programme:

Procurement and Small Business Update – January 2026
Scrutiny of the Portfolio Holders – January 2026

RESOLVED: That the report be noted.

54 FORWARD PLAN OF KEY DECISIONS

The Committee noted the Forward Plan of Key Decisions covering the period October 2025 to January 2026.

55 PORTFOLIO HOLDER DECISIONS - PRE-DECISION SCRUTINY

The Committee considered the following reports where Portfolio Holders were recommended to take a decision.

**A INSURANCE FUND ANNUAL REPORT 2024/25
Report FSD25066**

The report advised Members of the Insurance Fund position as at 31st March 2025 and presented statistics relating to insurance claims for the last few years. In 2024/25, the total Fund value increased from £4.5m to £4.8m. A mid-year review of the Fund had also been carried out and at this stage, it was estimated that the final Fund value as at 31st March 2026 would decrease to approximately £4.7m. The position would continue to be monitored throughout the year.

The Committee noted that insurance policy unoccupancy conditions were outlined in the report. The Insurance and Risk Manager explained that these were standard insurance policy conditions, and it was the responsibility of the Council's Property Department to ensure compliance with the conditions.

In response to a question, the Insurance and Risk Manager confirmed that he was not aware of any commercial insurer offering any policy for empty commercial properties. The Property Department had been asked to provide a list of empty properties to enable an approach to the insurance market, but it

was the view of the Insurance and Risk Manager that such cover would be unlikely.

The Committee noted that there were a number of empty properties within the Council's portfolio however information had only recently been received by the Insurance and Risk Manager and there had not been sufficient time to determine the value.

It was suggested that there should be a further item at a future meeting and that the Council's Property Division should be invited to join the discussion.

In response to a question, the Insurance and Risk Manager suggested that the reduction in public liability claims was the result of issues with the highways contractor being satisfactorily resolved.

A Member suggested that it would be prudent to monitor the number of claims in respect of the lease car fleet. It was suggested that if the number of claims continued to grow it could be prudent to consider the cost/benefit of requiring drivers of lease car to undertake an advanced driving course.

The Vice-Chairman suggested that it might be helpful in future reports to include details of where the Council had been able to recover funds from contractors through counter claims.

RESOLVED: That the recommendations be supported.

**B TREASURY MANAGEMENT - QUARTER 2 PERFORMANCE
2025/26 & MID-YEAR REVIEW
Report FSD25080**

This report summarised treasury management activity during the second quarter of 2025/26. Investments as at 30 September 2025 totalled £287.2m (£296.5m at 30 June 2025) and there was no outstanding external borrowing.

The report ensured that the Council was implementing best practice and complying with the requirements of the CIPFA Code of Practice for Treasury Management.

The report also included a mid-year review of the treasury management strategy statement and annual investment strategy (Appendix 4).

In response to a question, the Director of Finance explained that there were a number of variables determining the timing of future borrowing. These details would be included in the budget report which would be presented to Members at the next meeting.

RESOLVED: That the recommendations be supported.

**C CAPITAL PROGRAMME MONITORING - QUARTER 2 2025/26
Report FSD25077**

On 26 November 2025, the Executive would receive a report summarising the current position on capital expenditure and receipts following the second quarter of 2025/26 and would be asked to agree a revised capital programme for the period 2025/26 to 2029/30. This report highlighted changes to be considered by the Executive in respect of the capital programme for the Resources, Commissioning and Contract Management portfolio. The revised programme for this portfolio was set out in Appendix A and detailed comments on individual schemes were shown in Appendix B.

RESOLVED: That the recommendations be supported.

**D PAYMENT MANAGEMENT SYSTEM
Report FSD25081**

The Payment Management System was the core platform for the Council's payment and income management functions and enabled the Council and its agents to manage financial transactions in excess of £46m annually.

The Council had operated and developed the use of its existing system through the implementation of additional modules, since 2002 when it was introduced. The system was embedded across a range of service areas and systems. The system continued to fully meet the Council's requirements in terms of payment and income management.

The report sought delegated authority to procure a Payment Management System by making a direct award through a complaint procurement framework for a 5-year contract, commencing April 2026.

In response to a question concerning the difference between the procurement of this contract and the recent banking contract, the Assistant Director for Governance and Procurement explained that whilst there were a number of differences between the two contracts, the key difference was the market environment and the market conditions for the software.

The Chairman noted that the contract delivered an overall saving for the Council.

RESOLVED: That the recommendations be supported.

56 PRE-DECISION SCRUTINY OF EXECUTIVE REPORTS

The Committee considered the following reports on the Part 1 agenda for the meeting of the Executive on 26 November 2025:

**(5) BUDGET MONITORING 2025/26
Report FSD25078**

The report provided the second budget monitoring position for 2025/26 based on expenditure and activity levels up to the end of September 2025. The report also highlighted any significant variations which would impact on future years as well as any early warnings that could impact on the final year end position.

In response to a question concerning the DSG deficit, the Director of Finance explained that it was expected that the White Paper would be part of the local government settlement. Nationally, the total DSG deficit for Local Authorities was around £8bn and it was expected that the Office of Budget Responsibility (OBR) as part of the Government Budget process later in the week.

The Committee referred issues around the approach to mitigating the overspend in the Environment Portfolio to the Environment and Community Services PDS Committee for review.

In response to a question concerning progress with the Transformation Programme, the Director of Finance confirmed that the budget report which would be presented in January 2026 would provide the key details as well as an updated financial forecast.

The Committee noted that January's budget report would refer to the ongoing impact of the Churchill Court site. Churchill Court formed part of the Council's property portfolio and there was some rental income. It was agreed that the Portfolio Holder for Renewal, Recreation and Housing would give some consideration as to the most appropriate way to present the income and expenditure relating to the Churchill Court site and report back to the Committee.

RESOLVED: That the recommendations be supported.

**(6) CAPITAL PROGRAMME MONITORING - QUARTER 2 2025/26
Report FSD25078**

The report summarised the current position on capital expenditure and receipts following the conclusion of the second quarter of 2025/26 monitoring exercise.

The report also included details of proposed new schemes and additions to existing schemes, as well as the removal of various schemes that were now either complete or no longer being progressed.

RESOLVED: That the recommendations be supported.

**(7) COUNCIL TAX SUPPORT/REDUCTION SCHEME
Report FSD25081**

The report sought approval for the 2026/27 Council Tax Support Scheme.

The Committee noted that the Council Tax Support/Reduction Scheme could be amended annually however, as there had been a significant change last year the aim was not to change it this year.

In response to a question concerning the impact of previous changes on vulnerable adults and children, the Assistant Director for Exchequer Services explained that at this point in the year there was not quite six months' worth of data. The intention was to undertake a full review once a complete years' worth of data was available.

RESOLVED: That the recommendation be supported.

57 POLICY DEVELOPMENT AND OTHER ITEMS

**A BIGGIN HILL UPDATE
Report CSD25131**

At the meeting of the ERC PDS on 23 June 2025, the Members of the Committee requested an update on matters relating to Biggin Hill Airport in Autumn 2025.

This report provided updates on matters relating to Biggin Hill Airport, particularly progress on the alternative approach to Runway 03. The Airport Monitoring Officer explained that there had been no flights using the approach to Runway 03 yet, although the expectation was that aircraft would be able to fly the new approach by Thursday 27 November. Members were told that the new approach to Runway 03 was expected to deliver significant noise reduction. The six-month trial would run from November although it was hoped that the alternative approach would continue beyond that timeframe. It was expected that all capable aircraft would use the alternative approach. During the trial, the Airport would be collecting data on noise levels in order to assess the impact of the changes. The Airport Monitoring Officer agreed to confirm what, if any, increased aircraft mileage resulted from the alternative approach.

In advance of the meeting the Ward Councillor for Darwin had submitted a representation which the Chairman agreed should be attached to the minutes at **Appendix A**.

The Committee noted that the Portfolio Holder for Renewal Recreation and Housing was the Council representative on the Consultative Committee.

Members of the Committee expressed disappointment and frustration with regard to the ongoing delays with the review of the Noise Action Plan (NAP). The Committee noted that there would be a further review by the Airport with a report back to this Committee in the latter part of next year. The intention was that a NAP review would be considered by the Committee at that time. It was noted that the Airport was responsible for reviewing the NAP every five years and this was done in association with the Council. The Council had not accepted that the review had been completed, although it was noted that recently there had been more engagement than had previously been the case.

In response to a question the Airport Monitoring Officer confirmed that the CAA had rejected the initial application for Runway 03 but since that time the Airport had been working to bring forward a revised proposal which addressed the concerns raised.

In response to a question, the Property Major Programme Manager confirmed that the Airport and Council were working with the Museum regarding the preservation of the remains of The Hut for display at the Museum, the cost of which was yet to be determined. The Property Major Programme Manager also confirmed that £200,000 of the settlement monies are allocated to the Museum for use in connection with The Hut with a further £100,000 for heritage related purposes.

The Property Major Programme Manager confirmed that the airport were liaising with the Council and Historic England to carry out work to repair the E-Pens which are listed structures. Work was planned for next year once the weather had improved.

The Property Major Programme Manager confirmed that only one additional structure was being considered by Historic England for listing in addition to the existing E-Pens, and the Committee asked if a list of historical assets could be provided.

In relation to West Camp, the Committee noted that the Council was not the owner and that Historic England was liaising with the owner for preservation of the historic buildings.

In response to a question the Chairman asked whether Business Rates were being charged on the buildings at West Camp. The Property Major Programme Manager agreed to provide a response following the meeting, noting that their listed status may cause an exemption.

In response to question around the verification of complaints data, the Airport Monitoring Officer confirmed that all complaints were reviewed by the Noise and Safety Committee on which he sat. The Council did also carefully review complaints and accessed additional information relating to the Airport. In

24 November 2025

addition to this, internal and external advice was utilised. The Chairman also noted that the Council was able to verify if figures had been calibrated properly. The Airport Monitoring Officer also confirmed that there would be a full investigation of any inconsistencies in any information provided by the Airport.

A Member of the Committee read extracts from an email that had been sent by a local resident to some councillors. In response to a question that was raised, the Airport Monitoring Officer confirmed that helicopters were affected by noise sensitive areas in the same way as other aircraft.

The Committee requested that any sanctions applied in the future be reported to the Committee. The Committee also suggested that it may be helpful to consider whether the minutes from the Consultative Committee be made available on or from the Council website.

RESOLVED: That it be noted that the trial for an alternative approach to runway 03 has been approved and is commencing, which is expected to deliver significant noise reduction benefits for residents under the flightpath.

B SECTION 106 AGREEMENTS UPDATE

The report provided an update on Section 106 Agreements. The Committee noted that the report would also be considered by the Development Control Committee.

RESOLVED: That the report be noted.

C CORPORATE CONTRACT REGISTER Report CSD25129A

This report presented November 2025's Corporate Contracts Register for consideration.

Detailed scrutiny of individual contracts was the responsibility of the six PDS Committees with ERC PDS taking an overview of the Council's larger value (£200k+) contracts to ensure that commissioning and procurement activity was progressed in a consistent manner. This report provided both the Council wide £200k+ register together with the £50k+ register specific to the ERC Portfolio.

A full report was provided twice a year (May and November) including a detailed Part 2 report which included a commentary on each relevant contract to inform Members of any issues or developments. Otherwise, a Part 1 Register only would be provided as a For Information item with an accompanying Part 2 report only for any contracts RAG rated Red by the Corporate Procurement Team.

In response to a question concerning contract ID3672 – Inform CPI Ltd, the Assistant Director for Governance and Procurement confirmed that further enquiries would be made with the contracts owner and Members would be updated as appropriate.

The Committee received an update on the two flagged contracts – one had been flagged due to a timing issue, and it was anticipated that an extension would be authorised. With respect to the other flagged contract concerning direct payments, an alternative contract had now been put in place. The Chairman congratulated Officers on the smooth transition to the new Direct Payments contract.

RESOLVED: That the report and the detailed commentary in Part 2 be noted.

**58 LOCAL GOVERNMENT ACT 1972 AS AMENDED BY THE
LOCAL GOVERNMENT (ACCESS TO INFORMATION)
(VARIATION) ORDER 2006, AND THE FREEDOM OF
INFORMATION ACT 2000**

RESOLVED that the Press and public be excluded during consideration of the items of business referred to below as it is likely in view of the nature of the business to be transacted or the nature of the proceedings that if members of the Press and public were present there would be disclosure to them of exempt information.

**The following summaries
refer to matters involving exempt information**

**59 PRE-DECISION SCRUTINY OF EXEMPT PORTFOLIO HOLDER
REPORTS**

The Committee considered the following reports on the Part 2 agenda where a Portfolio Holder was recommended to take a decision.

A PART 2 APPENDIX - PAYMENT MANAGEMENT SYSTEM

The Committee noted the Part 2 Appendix.

**60 PRE-DECISION SCRUTINY OF EXEMPT EXECUTIVE
REPORTS**

The Committee considered the following reports on the Part 2 agenda for the meeting of the Executive on 26 November 2025:

**(14) PART 2 APPENDIX - CAPITAL PROGRAMME MONITORING -
QUARTER 2 2025/26**

The Committee noted the Part 2 Appendix.

61 PART 2: POLICY DEVELOPMENT AND OTHER ITEMS

A PART 2: CORPORATE CONTRACT REGISTER

The Committee noted the detailed Part 2 commentary.

The Meeting ended at 8.48 pm

Chairman

Item 9(a) – Biggin Hill Update

Representation from Councillor Jonathan Andrews, Darwin Ward

As Darwin's ward councillor – the ward immediately adjacent to, and which largely surrounds, Biggin Hill, and Biggin Hill Airport in particular – I am routinely contacted by local residents with serious concerns – and complaints – regarding the airport's activities and their impact on our local amenities, environment and way of life. These range from excessive noise and disruption caused by flights, to the environmental impact and pollution of the airport's activities, and I have worked consistently year-on-year to ensure that residents' voices and views are heard, listened to and properly considered as part of ongoing discussions – from previous attempts by the airport to amend its lease to allow fare-paying passengers (which I firmly opposed), to speaking out on adding air quality monitoring, among other issues, to the new Noise Action Plan.

Given the focus of this report on the ongoing trial of Runway 03, I wanted to remind the committee of my request, at the last meeting in which the issue was considered in-depth, that, should this route proceed to be trialled or implemented, the Noise Sensitive Area regime applicable to BHAL flights should be reviewed, with a view to ensuring local residents residing under this new route be protected from the impact of flights to the greatest extent possible. This is particularly important because whilst I acknowledge that Runway 03 avoids many of the most populous areas under the current BHAL flightpath, it appears from the map at paragraph 4.1.5 that it passes over several areas of Darwin ward, such as Leaves Green/Leavesden, Downe, Hazelwood and Pratts Bottom, where a significant number of residents reside. It is therefore imperative, particularly as the number of aircraft movements using the route increase (as is expected "during the course of the trial over the coming months", per paragraph 4.1.2), and if the route is to be made permanent, that the positioning of Noise Sensitive Areas are properly and seriously considered, reviewed, and implemented where needed.

With respect to the wider NAP review, I note this is envisaged to be completed next year, per paragraph 4.2.6. I would also reiterate the point I have made several times that throughout these negotiations, it is most crucial that a firm stance is taken to maintain, and indeed to strengthen and expand wherever possible, existing protections – not least given the impact on my residents' day-to-day lives that the airport's activities far too often result in.

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Report No.
CDS26009

London Borough of Bromley

PART 1 – PUBLIC

Title: **MATTERS OUTSTANDING AND WORK PROGRAMME**

Decision Maker: **EXECUTIVE, RESOURCES AND CONTRACTS POLICY
DEVELOPMENT AND SCRUTINY COMMITTEE**

Date: **Monday 19 January 2026**

Decision Type: Non-Urgent Non-Executive Non-Key

Contact Officer: Philippa Gibbs, Democratic Services Officer
Tel: 020 8461 7638 E-mail: Philippa.Gibbs@bromley.gov.uk

Chief Officer: Director of Corporate Services and Governance

Ward(s): All Wards

1. REASON FOR REPORT

1.1 This report deals with the Committee's business management including:

- Monitoring progress against actions arising from previous meetings; and
- Developing the 2025/26 Forward Work Programme.

2. RECOMMENDATION(S)

That PDS Committee reviews and comments on:

1. Progress on matters arising from previous meetings; and
2. The 2025/26 work programme, indicating any changes or particular issues that it wishes to scrutinise for the year ahead.

3. KEY SUMMARIES

Financial

1. Cost of proposal: Not Applicable:
 2. Ongoing costs: Not Applicable:
 3. Budget head/performance centre: Democratic Services
 4. Total current budget for this head: £402k
 5. Source of funding: Revenue Budget
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Legal

1. Legal Requirement: None:
 2. Call-in: Not Applicable:
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Background Documents: (Access via Contact Officer)	Minutes of previous meetings
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4. BACKGROUND/OPTIONS

Work Programme

- 4.1 Each PDS Committee determines its own work programme for the one year period for which it has been convened. The PDS Committees should be mindful of balancing the roles of (i) pre-decision scrutiny and holding the Executive to account, (ii) policy development and review and (iii) external scrutiny. ERC PDS Committee has the additional role of providing a lead on scrutiny issues and co-ordinating PDS work.
- 4.2 PDS Committees need to prioritise their key issues. The work programme also needs to allow room for items that arise through the year, including Member requests, call-ins and referrals from other Committees. Committees need to ensure that their workloads are realistic and balanced, allowing sufficient time for important issues to be properly scrutinised. Members also need to consider the most appropriate means to pursue each issue – the current overview and scrutiny arrangements offer a variety of approaches, whether through a report to a meeting, a time-limited working group review, a presentation, a select committee style meeting focused on a single key issue, or another method.
- 4.3 **Appendix 1** sets out the ERC PDS Committee Work Programme for 2025/26, including: the provisional report title (or activity); the lead division; and Committee's role. Committee is invited to comment on the proposed schedule and suggest any changes it considers appropriate for the municipal year. Other reports will be added to the 2025/26 Work Programme as items arise. In addition, there may also be references from other committees or the Executive. Development of the work programme is ongoing. At the final meeting of the municipal year, the Committee will have the opportunity to note the proposed work programme for the following municipal year, subject to the Committee being reconvened. The approval of any work programme for subsequent municipal years is within the remit of the Committee Membership for that municipal year.

Matters Outstanding from Previous Meetings

- 4.4. **Appendix 2** provides a progress update on requests made by the Committee at previous meetings requiring a Part 2 response.

Sub-Committees and Working Groups

- 4.5 The Policy Development and Scrutiny Toolkit suggests that each Committee should aim to carry out no more than two or three full scale reviews each year, and it offers guidance and techniques for prioritising reviews. At a time of pressure on Member and officer resources it is important that any additional work is carefully targeted at priority issues where improvements can be achieved.

**EXECUTIVE, RESOURCES & CONTRACTS PDS COMMITTEE
WORK PROGRAMME 2025/26**

Meeting Date: 9 February 2026	Division	Committee Role
Matters Arising/Work Programme/Forward Plan	Democratic Services	Standard Items
Executive Agenda	Various	Pre-decision scrutiny
Annual Investment Strategy 2024/25 and Quarter 3 Treasury Management Performance	Finance	PH Decision/Council
Contracts Register and Contracts Database Update	Governance and Contracts	PDS Committee
Scrutiny of The Leader (including short written summary)	N/A	PDS Committee
Property Investment Update	Property	PDS Committee
Meeting Date: 7 April 2026	Division	Committee Role
Matters Arising/Work Programme/Forward Plan	Democratic Services	Standard Items
Executive Agenda	Various	Pre-decision scrutiny
Scrutiny of the Chief Executive (including short written summary)	N/A	PDS Committee
Capital Programme Monitoring Q.3	Finance	PH Pre-Decision Scrutiny
BT/ICT Contract Monitoring Report	Corporate Services (IT)	PDS Committee
Exchequer Service Contract Monitoring Report	Finance	PDS Committee – Monitoring Report
Customer Services - Contract Performance Report	Customer Services	PDS Committee – Monitoring Report
Annual PDS Report 2025/26	Democratic Services	PDS Committee

*Part 2 (Exempt) Report

To be scheduled: Corporate Advertising and Sponsorship Policy

LONDON BOROUGH OF BROMLEY

FORWARD PLAN OF KEY AND PRIVATE EXECUTIVE DECISIONS PUBLISHED ON: 23 December 2025

PERIOD COVERED: January 2026 - April 2026 *

DATE FOR PUBLISHING NEXT FORWARD PLAN OF KEY AND PRIVATE EXECUTIVE DECISIONS: 16 January 2026

WHAT IS BEING DECIDED?	WHO IS THE DECISION MAKER?	WHEN WILL THE DECISION BE MADE AND WHO WILL BE CONSULTED BEFORE THE DECISION IS MADE?	HOW WILL THE CONSULTATION TAKE PLACE?	HOW CAN YOU MAKE COMMENTS ON THE DECISION BEFORE IT IS MADE?	WILL THIS ITEM BE CONSIDERED IN PUBLIC OR IN PRIVATE?	WHAT SUPPORT DOCUMENTS AND OTHER INFORMATION WILL BE AVAILABLE?
COUNCIL						
REVENUE BUDGET 2026/27	Council	26 February 2026 Executive, PDS Committees, business community and local residents	Meetings	Contact Officer: Peter Turner Tel: 020 8313 4668 peter.turner@bromley.gov.uk	<u>Meeting in public</u>	Report and relevant background documents
COUNCIL TAX SUPPORT SCHEME	Council	26 February 2026 Executive	Meetings	Contact Officer: Stephen Mcginnes stephen.mcginnes@bromley.gov.uk	<u>Meeting in public</u>	Report and relevant background documents

WHAT IS BEING DECIDED?	WHO IS THE DECISION MAKER?	WHEN WILL THE DECISION BE MADE AND WHO WILL BE CONSULTED BEFORE THE DECISION IS MADE?	HOW WILL THE CONSULTATION TAKE PLACE?	HOW CAN YOU MAKE COMMENTS ON THE DECISION BEFORE IT IS MADE?	WILL THIS ITEM BE CONSIDERED IN PUBLIC OR IN PRIVATE?	WHAT SUPPORT DOCUMENTS AND OTHER INFORMATION WILL BE AVAILABLE?
CAPITAL STRATEGY 2025 TO 2029	Council	26 February 2026 Executive, PDS Committees and key stakeholders	Meetings	Contact Officer: James Mullender Tel: 020 8313 4292 James.Mullender@bromley.gov.uk	<u>Meetings in public</u>	Reports and relevant background documents.
TREASURY MANAGEMENT STRATEGY 2026/27	Council	26 February 2026 Executive, Resources and Contracts PDS Committee	Meetings	Contact Officer: James Mullender Tel: 020 8313 4292 James.Mullender@bromley.gov.uk	<u>Meeting in public</u>	Reports and relevant background documents
EXECUTIVE						
BASIC NEED PROGRAMME	Executive	11 February 2026 Children, Education and Families PDS Committee	Meetings	Contact Officer: Robert Bollen Tel: 020 8313 4697 Robert.Bollen@bromley.gov.uk	<u>Meeting in public</u>	Report and relevant background documents
CONTRACT AWARD FOR CARE AND SUPPORT PROVISION TO EXTRA CARE HOUSING SCHEMES	Executive	11 February 2026 Adult Care and Health PDS Committee	Meetings	Contact Officer: Agnes Olagunju agnes.olagunju@bromley.gov.uk	<u>Report is expected to be considered in the public part of the meeting with exempt material considered during confidential proceedings.</u>	Report and relevant background documents

WHAT IS BEING DECIDED?	WHO IS THE DECISION MAKER?	WHEN WILL THE DECISION BE MADE AND WHO WILL BE CONSULTED BEFORE THE DECISION IS MADE?	HOW WILL THE CONSULTATION TAKE PLACE?	HOW CAN YOU MAKE COMMENTS ON THE DECISION BEFORE IT IS MADE?	WILL THIS ITEM BE CONSIDERED IN PUBLIC OR IN PRIVATE?	WHAT SUPPORT DOCUMENTS AND OTHER INFORMATION WILL BE AVAILABLE?
STATEMENT OF COMMUNITY INVOLVEMENT	Executive	11 February 2026 Development Control Committee Renewal, Recreation & Housing PDS Committee	Meetings	Contact Officer: Dominique Barnett dominique.barnett@bromley.gov.uk	<u>Meeting in public</u>	Report and relevant background documents
DWP TRAILBLAZER PHASE 2 GRANT FUNDING	Executive	11 February 2026 Renewal Recreation and Housing PDS Committee	Meetings	Contact Officer: Daniel Murray Daniel.Murray@bromley.gov.uk	<u>Meeting in public</u>	Report and relevant background documents
DOMICILIARY CARE PROCEEDING TO PROCUREMENT GATEWAY REPORT	Executive	11 February 2026 Adult Care and Health PDS Committee	Meetings	Contact Officer: Phil White, Channelle-Ghania Ali Tel: 020 8313 4857, philip.white@bromley.gov.uk , Channelle-Ghania.Ali@bromley.gov.uk	<u>Report is expected to be considered in the public part of the meeting with exempt material considered during confidential proceedings.</u>	Report and relevant background documents

WHAT IS BEING DECIDED?	WHO IS THE DECISION MAKER?	WHEN WILL THE DECISION BE MADE AND WHO WILL BE CONSULTED BEFORE THE DECISION IS MADE?	HOW WILL THE CONSULTATION TAKE PLACE?	HOW CAN YOU MAKE COMMENTS ON THE DECISION BEFORE IT IS MADE?	WILL THIS ITEM BE CONSIDERED IN PUBLIC OR IN PRIVATE?	WHAT SUPPORT DOCUMENTS AND OTHER INFORMATION WILL BE AVAILABLE?
SUPPORTED LIVING PROCEEDING TO PROCUREMENT GATEWAY REPORT	Executive	11 February 2026 Adult Care and Health PDS Committee	Meetings	Contact Officer: Andrew Royle Tel: 020 8461 7601 andrew.royle@bromley.gov.uk	<u>Report is expected to be considered in the public part of the meeting with exempt material considered during confidential proceedings.</u>	Report and relevant background document
COMPLEX LEARNING DISABILITIES DAY SERVICE CONTRACT AWARD	Executive	08 April 2026 Adult Care and Health PDS Committee	Meetings	Contact Officer: Michael Fowle Tel: 020 8461 7815 michael.fowle@bromley.gov.uk	<u>Report is expected to be considered in the public part of the meeting with exempt material considered during confidential proceedings.</u>	Report and relevant background documents
CONTRACT AWARD - HIGHWAY MAINTENANCE	Executive	08 April 2026 Environment and Community Services PDS Committee	Meetings	Contact Officer: Garry Warner Tel: 020 8313 4929 garry.warner@bromley.gov.uk	<u>Report is expected to be considered in the public part of the meetings with exempt material considered during confidential proceedings.</u>	Report and relevant background documents
GATEWAY REPORT 0-19 CHILDREN'S PUBLIC HEALTH SERVICE	Executive	June 2026 Adult Care and Health PDS Committee	Meetings	Contact Officer: Dr Jenny Selway Tel: 0208 313 4769 jenny.selway@bromley.gov.uk	<u>Meeting in public</u>	Report and relevant background documents

WHAT IS BEING DECIDED?	WHO IS THE DECISION MAKER?	WHEN WILL THE DECISION BE MADE AND WHO WILL BE CONSULTED BEFORE THE DECISION IS MADE?	HOW WILL THE CONSULTATION TAKE PLACE?	HOW CAN YOU MAKE COMMENTS ON THE DECISION BEFORE IT IS MADE?	WILL THIS ITEM BE CONSIDERED IN PUBLIC OR IN PRIVATE?	WHAT SUPPORT DOCUMENTS AND OTHER INFORMATION WILL BE AVAILABLE?
BASIC NEED PROGRAMME	Executive	June 2026 Children Education and Families PDS Committee	Meetings	Contact Officer: Robert Bollen Tel: 020 8313 4697 Robert.Bollen@bromley.gov.uk	<u>Meeting in public</u>	Report and relevant background documents
HOUSING IT SYSTEMS REVIEW - CONTRACT AWARD	Executive	June 2026 Renewal Recreation and Housing PDS Committee	Meetings	Contact Officer: Tessa Wilson Tel: 020 8313 4515 tessa.wilson@bromley.gov.uk	<u>Report is expected to be considered in the public part of the meetings with exempt material considered during confidential proceedings.</u>	Report and relevant background documents
ADULT CARE & HEALTH PORTFOLIO						
CHILDREN, EDUCATION & FAMILIES PORTFOLIO						
ACCEPTANCE OF 3-YEAR EXTENSION OF THE GRANT HOLIDAY ACTIVITY FUND PROGRAMME	Portfolio Holder for Children, Education and Families	Not before 29 January 2026 Children Education and Families PDS Committee	Meetings	Contact Officer: Laura Compton laura.compton@bromley.gov.uk	<u>Meeting in public</u>	Report and relevant background documents
AWARD OF CONTRACT FOR CAPITAL WORKS AT HAWES DOWN PRIMARY SCHOOL	Portfolio Holder for Children, Education and Families	Not before 19 March 2026 Children, Education and Families PDS Committee	Meetings	Contact Officer: Robert Bollen Tel: 020 8313 4697 Robert.Bollen@bromley.gov.uk	<u>Report is expected to be considered in the public part of the meeting with exempt material considered during confidential proceedings.</u>	Report and relevant background documents

WHAT IS BEING DECIDED?	WHO IS THE DECISION MAKER?	WHEN WILL THE DECISION BE MADE AND WHO WILL BE CONSULTED BEFORE THE DECISION IS MADE?	HOW WILL THE CONSULTATION TAKE PLACE?	HOW CAN YOU MAKE COMMENTS ON THE DECISION BEFORE IT IS MADE?	WILL THIS ITEM BE CONSIDERED IN PUBLIC OR IN PRIVATE?	WHAT SUPPORT DOCUMENTS AND OTHER INFORMATION WILL BE AVAILABLE?
EDUCATION PLANNED MAINTENANCE PROGRAMME 2026/27	Portfolio Holder for Children, Education and Families	Not before 01 June 2026 Children, Education and Families PDS Committee	Meetings	Contact Officer: Robert Bollen Tel: 020 8313 4697 Robert.Bollen@bromley.gov.uk	<u>Meeting in public</u>	Report and relevant background documents
AWARD OF CONTRACT FOR CAPITAL WORKS AT GLEBE SCHOOL/HAWES DOWN CENTRE (PHASE 1)	Portfolio Holder for Children, Education and Families	Not before 01 June 2026 Children, Education and Families PDS Committee	Meetings	Contact Officer: Robert Bollen Tel: 020 8313 4697 Robert.Bollen@bromley.gov.uk	<u>Meeting in Public</u>	Report and relevant background documents
AWARD OF CONTRACT FOR CAPITAL WORKS AT MARIAN VIAN PRIMARY SCHOOL	Portfolio Holder for Children, Education and Families	Not before 01 June 2026 Children, Education and Families PDS Committee	Meetings	Contact Officer: Robert Bollen Tel: 020 8313 4697 Robert.Bollen@bromley.gov.uk	<u>Meeting in public</u>	Report and relevant background documents
ENVIRONMENT						
LEADER OF THE COUNCIL						
PUBLIC PROTECTION & ENFORCEMENT PORTFOLIO						
RENEWAL, RECREATION & HOUSING PORTFOLIO						
TRANSPORT, HIGHWAYS AND OPEN SPACES						

*** Please note: The statutory reporting period for the Forward Plan of Key Decisions is 3 months, the London Borough of Bromley includes items up to 12 months in advance.**

London Borough of Bromley: 020 8464 3333 www.bromley.gov.uk

Contact Officer: Philippa Gibbs, Chief Executive's Department: 020 8461 7638, philippa.gibbs@bromley.gov.uk

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Update from the Deputy Leader and Portfolio Holder for Children, Education and Families

Democratic Services

- Local Election preparations are well under way
- New Member Induction plans went to GP&L in November

IT

- Windows 11/replacement laptops rollout is now complete
- Continue to explore AI options where financial case can be made
- There was a cyberattack at Kensington & Chelsea in November – we were not impacted. Following this, reminders were sent to all staff, as it was caused by a link being clicked on during a Teams meeting. Also undertake mock phishing to check on staff
- Focus of cyber security over the Christmas period as statistically more fraud

HR

- Been working on preparing the 2026/7 Pay Award response, the Pay Policy statement, restructures across the organisation (currently circa 16 restructurings happening simultaneously), a rising number of employee relations issues and grievances due to financial transformation challenges, and organisation development and training to support both managers and employees - including mentoring, welfare support and capacity building/coping strategies to manage complex and simultaneous changes
- AI project/pilot being undertaken - to answer pay, annual leave queries etc

Procurement

- Very busy in Procurement, assessing multiple savings proposals and looking at contracts nearing renewal for savings
- Been working on the barriers to small businesses report that will be at ERC
- Looking at alternative options to follow when contract ends - rather than always having to re-tender

Legal

- Continuing to use frameworks with fixed prices for legal services in areas of expertise that we don't currently have or when we don't have the capacity.
- Also exploring developing in-house advocacy capacity to reduce counsel's fees.

Corporate Health & Safety

- HSE Asbestos Inspection started on 11th December. The HSE are currently due to be doing site visits on 14th January and 22nd January (two visits a day).

Therefore, we can likely expect an overall outcome late January/early February. The initial feedback from the visit to the Civic Centre and Petts Wood Library was positive.

ERC Portfolio Holder Report for Property and Biggin Hill – January 2026

Biggin Hill Airport

- **Runway 03** - An alternative approach to runway 03 has been approved by the Civil Aviation Authority (CAA) and is commencing, with this new approach set to deliver significant noise reduction benefits for residents under the flightpath. During the course of the six-month trial, Biggin Hill Airport Limited (BHAL) is developing an Airspace Change Proposal to submit to the CAA that would make the alternative approach to runway 03 permanent. The Council will continue to support BHAL in delivering the alternative approach to runway 03 wherever possible, which follows the Council writing to the CAA on behalf of residents to outline its strong support for the proposed approach ahead of the trial receiving approval.
- **NAP** - Potential improvements and operational matters relating to noise and the airport's complaints process continue to be progressed, including through the Airport's Consultative Committee, with the Council continuing to seek improvements on behalf of residents under the flightpath. The Council will be engaging with BHAL for the upcoming NAP review, envisaged to be completed in the latter half of this year, with the Council's requirements for completing a NAP review outlined in previous committee reports.
- **Heritage assets** - The Council has also been liaising with BHAL and Historic England to ensure the preservation of heritage sites on the airport.
- **Movements** - There were 39,331 aircraft movements at Biggin Hill Airport in 2024 compared to 40,623 in 2023. In the first quarter of 2025, there were 6,996 movement compared to 7,291 in the first quarter of 2024.

Property

Major Projects

- Completion of purchase and refurbishment works to provide a brand-new children's home to be known as Solace Rise have now completed. A lease to Barnardo's has been agreed, with Barnardo's managing and operating the site on behalf of the Council. The official opening event will take place on 26th January 2026.
- Development of a brand-new purpose-built Health and Wellbeing Centre within Phase 4 of Churchill Court has now completed by the Council's Property Team. A 25-year lease with the NHS has now completed, and the new facility will open this month (January 2026) serving up to 1,500 residents per day.
- 'Bromley Homes for Bromley People scheme' - 12 properties have now been acquired under the programme, with a further 18 under offer and going through conveyancing.
- Operational Property Review capital works now complete at Griffin SEN School and Burnt Ash Children & Family Centre (December 2025)
- Castlecombe Children & Family Centre & Youth Centre in RIBA Stage 2 with planning expected to be considered at planning committee shortly.
- Blenheim CFC at RIBA Stage 3 with an application also expected to be considered at planning committee shortly.
- A comprehensive and ongoing review of the non-operational property portfolio is underway to identify and capitalise on opportunities to reduce cost, increase revenue and/or generate capital receipts.

Resourcing

- The Strategic Property Team went through a restructure which went live on the 1st October 2025 to ensure a fit for purpose team to meet the ever changing needs of the Council in line with the corporate Landlord Model. This enabled a move away from costly agency staff and a settled permanent co-hort of staff to most efficiently and effectively deliver a cost effective service.
- The FM helpdesk function was bought back in house which reduces cost and improves control over quality of service, particularly with regards to speed of reacting to reports.

Contracts

- Successfully retendered and mobilised 14 FM contracts which went live on 1st October 2025, delivering improved service coverage and ensuring value for money.
- Retendered the Total Facilities Management (TFM) contract for Churchill Court and commenced mobilisation with Ascot ahead of the April 2026 start date to ensure continuity and quality of service to minimise disruption to staff and residents using the Civic Centre.

Cllr Yvonne Bear

07/01/2026

Report No.
CSD26008

London Borough of Bromley

PART 1 – PUBLIC

Title:	REFERRAL FROM RENEWAL, RECREATION AND HOUSING PDS COMMITTEE: EMPTY HOMES – UPDATE		
Decision Maker:	EXECUTIVE, RESOURCES AND CONTRACTS POLICY DEVELOPMENT AND SCRUTINY COMMITTEE		
Date:	Monday 19 January 2025		
Decision Type:	Non-Urgent	Non-Executive	Non-Key
Contact Officer:	Oliver Punter, Regeneration Project Manager E-mail: Oliver.Punter@bromley.gov.uk Alicia Egan, Head of Regeneration E-mail: Alicia.Egan@bromley.gov.uk		
Chief Officer:	Director of Housing, Planning, Property and Regeneration		
Ward(s):	All Wards		

1. REASON FOR REPORT

- 1.1 An information briefing providing an update on the Council's current position in relation to empty homes in Bromley was considered at the meeting of Renewal, Recreation and Housing PDS Committee on 18 November 2025 (see Appendix 1).
- 1.2 In considering the update, a Member of the Committee moved that the Committee recommend that the Council's Executive agree to expand the empty homes premium to apply to properties empty for more than one year to take effect as soon as possible under the relevant national legislation. The Chairman noted that the scrutiny of any such proposal came within the remit of the Executive, Resources and Contracts PDS Committee and the Committee agreed to refer the matter to the Executive, Resources and Contracts PDS Committee for consideration (see Minute 41 at Appendix 2).

2. RECOMMENDATION(S)

2.1 The Executive, Resources and Contracts PDS Committee was asked to:

- 1) Consider the Empty Homes – Update; and,
- 2) Consider whether to recommend the Council's Executive agree to expand the empty homes premium to apply to properties empty for more than one year to take effect as soon as possible under the relevant national legislation.

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London Borough of Bromley

PART 1 - PUBLIC

Briefing for Renewal, Recreation and Housing Policy Development and Scrutiny Committee

Tuesday 18 November 2025

EMPTY HOMES - UPDATE

Contact Officer: Oliver Punter, Regeneration Project Manager
E-mail: Oliver.Punter@bromley.gov.uk

Alicia Egan, Head of Regeneration
E-mail: Alicia.Egan@bromley.gov.uk

Chief Officer: Director of Housing, Planning, Property and Regeneration

1. Summary

- 1.1. This report provides an update on the Council's current position in relation to empty homes within the borough.

2. THE BRIEFING

- 2.1 Central government data (November 2024) confirms that at least 265,061 homes in England have been empty for over six months, the highest figure since 2011. In total, it is estimated that the actual figure could be over 600,000 (excluding holiday lets and second homes). In Bromley, 3,068 homes were registered as vacant (or as second homes) in September 2025, up from 2,608 in September 2024. Of these 3,068 homes, **497 properties have been empty for over two years**, classifying them as long-term empty homes.
- 2.2 There are a range of reasons why properties may be left empty for up to two years which is why the empty homes premium takes effect once a property has been vacant for two years. Circumstances including the death of the homeowner (with the property left in probate), occupiers moving into care or older persons accommodation, or properties being prepared for sale or redevelopment are the main reasons for vacancy. More recently, essential building works such as cladding remediation have also contributed to prolonged vacancies.
- 2.3 Long term empty properties can remain vacant for a number of reasons, including a lack of interest from owners, or uncertainty about how to manage properties in disrepair. Bringing empty homes back into use not only helps meet increasing demand for housing but also contributes to the revitalisation of both town centres and residential areas. Empty homes can attract anti-social behaviour, vandalism and be a visual blight on local areas.
- 2.4 To incentivise action, Bromley Council introduced the Council Tax Premium (see Report No FSD19063, Executive August 2019), imposing additional charges on long-term empty properties: 100% for homes empty 2-5 years, 200% for 5-10 years, and 300% for over 10 years. Following amendments by the Levelling Up and Regeneration Act 2023, national legislation now

permits Councils to apply the Empty Homes Premium after one year of vacancy. The Council continues to apply the premium from the two-year threshold, as implemented in April 2020 but this national legislation presents a future opportunity for review, as the Council considers its options to reduce the number of empty properties.

- 2.5 However, despite taking this action, in the last year long term empty homes have increased from 381 in September 2024 to 497 in September 2025. This indicates that while the premium serves as a deterrent, it may not be sufficient on its own to bring all empty homes back into use. Bromley Council currently applies premium rates of up to 300% of the standard Council Tax for properties vacant for over ten years, generating an estimated £1,011,142 in additional revenue in FY 24/25. Across London, the premium has contributed to a decline in long-term empty homes. According to the Department for Levelling Up, Housing and Communities (DLUHC), the number of properties subject to the Empty Homes Premium in England rose to 119,606 in 2024, reflecting increased adoption of the policy. Data from the London Datastore also shows that reductions in long-term vacancy have supported net housing delivery across the capital. These figures suggest that the premium is an effective tool when used alongside broader housing and enforcement strategies.

Managing Empty Homes.

- 2.6 Following grant funding being secured for the Council Housing Acquisition Programme (CHAP) the Council sent letters to nearly 500 empty homes in the borough and received 137 responses. The letter invited owners to respond to suggestions that may support them bringing the empty home back into use. These suggestions included the Council purchasing the home (through CHAP funding), directing a Council renovation and leasing programme, updated empty homes guidance, a renovation grant and council tax relief scheme, planning process improvements, and legal and probate support.
- 2.7 Owners expressing interest in selling their property to the Council have been contacted as part of the CHAP funded Bromley Homes for Bromley People acquisition programme (HPR2024/060). This initiative is currently acquiring homes for much needed housing stock, generating revenue savings from costly nightly paid accommodation. To date, no empty homes have been purchased through this programme, as the three properties considered required extensive void works to meet the Decent Homes Standard. One example involved a Victorian property with structural issues and an EPC rating of E, which did not offer value for money and was deemed financially unviable under current programme criteria.
- 2.8 The government's New Homes Bonus (NHB) is a grant paid to local authorities in England to incentivise housing growth, including new-builds, conversions, and long-term empty homes brought back into use. Each qualifying property generates an annual payment based on the national average Council Tax Band D rate, with an additional £350 per year for affordable homes. Historically, NHB payments were made over six years, but this was reduced to five years in 2017–18 and then to four years from 2018–19 onwards. In some recent years, allocations have been made on a single-year basis only, meaning the bonus is no longer guaranteed as a multi-year income stream. Despite this, each empty home brought back into use still generates the same NHB income as a newly built home, but with lower capital cost. While new builds may attract the affordable housing premium, empty homes offer faster delivery and reduced procurement and planning complexity. Together, these approaches form a financially efficient strategy that strengthens the Council's position while expanding housing supply.
- 2.9 The Council's website will be updated to provide an updated empty homes support page, taking into account the feedback received from 137 empty home owners by February 2026, sharing advice and guidance for empty home owners on renting or selling via estate agents, care

providers, or directly to the Council (where funding is available). The majority of respondents to the survey indicated that they intended to independently complete works required to the property and sell on the open market, so the updated website will support this process.

- 2.10 Officers continue to explore the active solutions identified through the data gathering exercise to consider ways in which the Council may be able to respond to the management of Empty Homes, this includes lobbying government to fund programmes that support bringing Empty Homes back into use. While enforcement powers are available to local authorities, these are costly in terms of resources and currently this initiative is not funded.

Empty Homes Data (September 2025)

- 2.11 Council Tax records show 3,068 properties in Bromley are currently second homes or empty homes, though many are temporarily vacant due to probate or pending sale and are not subject to the Empty Homes Premium. There are currently 497 Long-Term Empty Homes in the borough which are those that have been unoccupied and unfurnished for over two years. Since April 2023, Bromley has applied the maximum premium rates permitted by legislation to these long-term cases. Properties that have been empty for less than one year are not yet charged the premium.

- 100% for homes empty 2–5 years
- 200% for 5–10 years
- 300% for over 10 years

- 2.12 Some properties previously charged a 50% premium were updated following a Council Executive decision in February 2023. The number of homes charged at applicable rates is shown below as of September 2025.

Period of Vacancy	Standard Charging rate	Number of Homes
2 – 5 years empty	100%	233
5 – 10 years empty	200%	149
Over 10 years empty	300%	115
Total		497

- 2.13 The above table shows 497 homes currently classified as long-term empty. The largest share falls within Council Tax Bands C and D, particularly within those vacant for 2-5 years. Some homes are charged a higher or lower rate than the standard rate due to policy transitions, specific cases and exemptions. This is live data so will change on a daily, weekly and monthly basis; this snapshot is accurate as of early October 2025. The premium applies to the property, not the owner meaning new owners may still be liable. Exemptions are limited, such as for armed forces personnel or annexes within a single dwelling.

Empty Homes Map – Split by Ward (October 2025)

- 2.14 The map below titled “Over 2 Year Empty Homes – Ward Totals” provides a visual snapshot of the number of residential properties across Bromley’s wards that have been vacant for over two years. These properties meet the definition of Long-Term Empty Homes and are subject to the

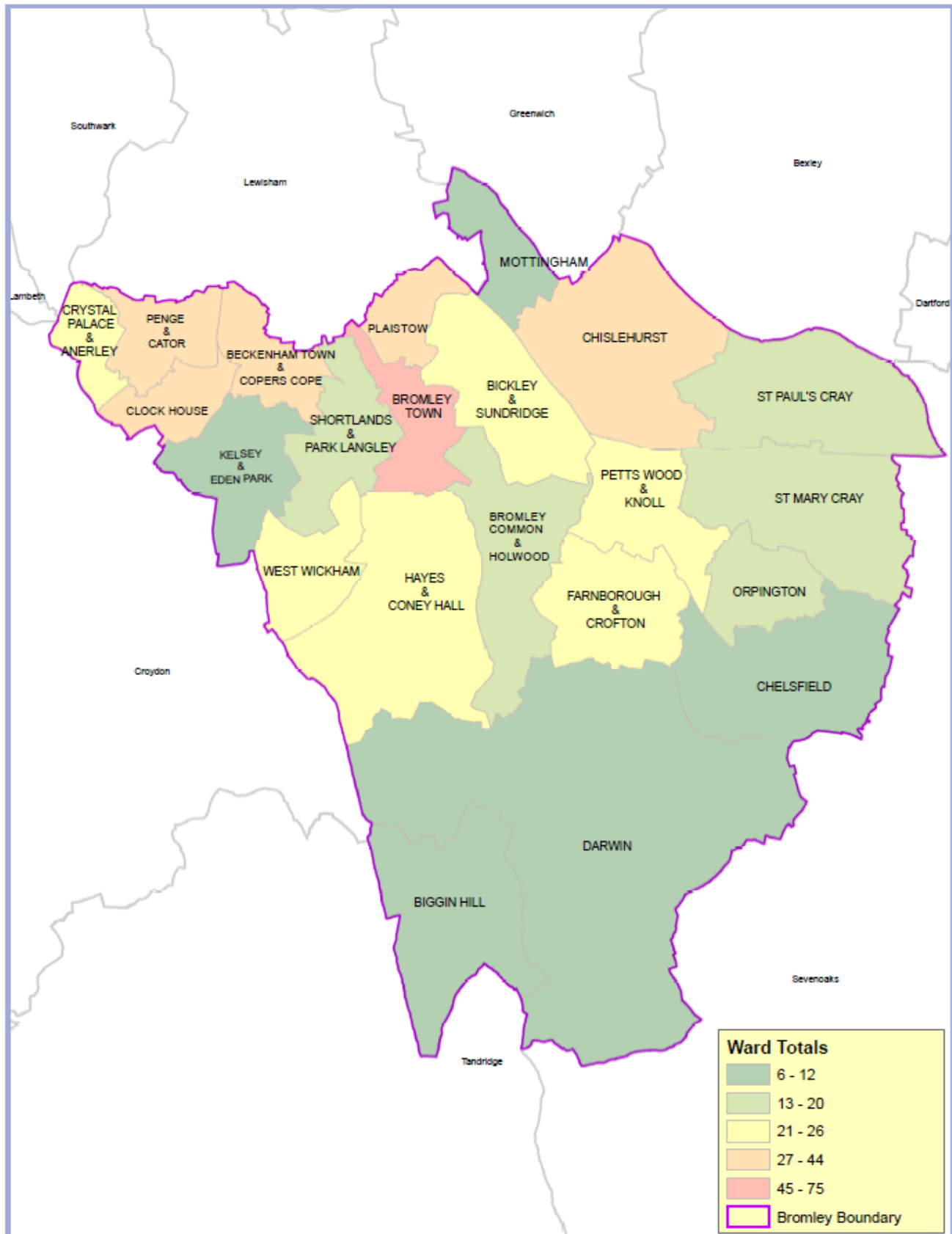
Council Tax Empty Homes Premium. These Wards are colour-coded to reflect the number of long-term empty homes, grouped into five ranges:

Range of Long-Term Empty Homes	Wards in This Category
6–12 homes	Chelsfield, Kelsey & Eden Park, Darwin, Biggin Hill, Mottingham.
13–20 homes	Bromley Common & Holwood, Shortlands & Park Langley, Orpington, St Mary Cray, St Pauls Cray.
21–26 homes	Petts Wood & Knoll, Farnborough & Crofton, Bickley & Sundridge, Hayes & Coney Hall, West Wickham, Crystal Palace & Anerley.
27–44 homes	Penge & Cator, Chislehurst, Clock House, Beckenham Town & Copers Cope, Plaistow.
45–75 homes	Bromley Town.

- 2.15 This spatial breakdown highlights variation across the borough. Wards such as Bromley Town fall within the highest category, with between 45 and 75 long-term empty homes. Several other wards, including Darwin and Biggin Hill, are in the lower ranges, with fewer than 26 such properties. These differences reflect both housing density and local characteristics and will be considered as part of the Council's developing approach to addressing long-term vacancy.
- 2.16 The map provides a useful overview of where long-term vacancy is most prevalent, supporting broader understanding of housing pressures and informing future monitoring and reporting.

Over 2 Year Empty Homes - Ward Totals

02 Oct 2025



0 1,500 3,000 6,000 9,000 12,000 Meters
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RENEWAL, RECREATION AND HOUSING POLICY DEVELOPMENT AND SCRUTINY COMMITTEE

Extract from the minutes of the meeting held at 7.00 pm on 18 November
2025

Present:

Councillor Tony Owen (Chairman)
Councillor Josh Coldspring-White (Vice-Chairman)
Councillors Hannah Gray, Christine Harris, Julie Ireland,
Simon Jeal, Chris Price, Alison Stammers,
Pauline Tunnicliffe and Gemma Turrell

Also Present:

Councillor Yvonne Bear, Portfolio Holder for Renewal,
Recreation and Housing

41 RENEWAL, RECREATION AND HOUSING INFORMATION BRIEFING

The items comprised:

- Digital Infrastructure Work Plan Update
- Empty Homes – Update

In response to questions from a Member on the Empty Homes update, the Head of Regeneration advised that as of the current date, there were 510 properties in the Borough identified as being empty for a period of one to two years. The empty homes levy, which was an additional charge on top of the standard Council Tax charge for homes unoccupied for an extended period, was managed on behalf of the Local Authority by Liberata, and a very rough estimate suggested that circa £600k could be raised in additional income should the empty homes levy be applied to properties empty for over a year. The most common reason for homes to be empty in the long-term was due to deceased owners or those who had entered a deferred payment agreement with the Local Authority to use their home's value to pay for care home fees. The Renewal Team's interest in this area related solely to identifying properties where landlords could be supported to bring rental properties back into use for social housing clients.

The Member moved that in recognition of the Council's challenging financial situation and ongoing budget gap, and in view of the fact that the current empty homes premium had not reduced the number of empty properties, the Committee recommend that the Council's Executive agree to expand the empty homes premium to apply to properties empty for more than one year to take effect as soon as possible under the relevant national legislation. The Chairman noted that the scrutiny of any such proposal came within the remit of the Executive, Resources and Contracts PDS Committee. While it was not

possible for the Committee to make such a recommendation to the Council's Executive, it could refer the matter to the Executive, Resources and Contracts PDS Committee for consideration, and this was supported by the Committee.

Another Member was aware of an empty housing association property within her ward and Members were encouraged to report any such properties to the Housing Service to enable the Local Authority to work with its housing association partners to bring empty properties back into use wherever possible.

RESOLVED: That:

- 1) The Information Briefing be noted; and,**
- 2) The Empty Homes - Update be referred to the Executive, Resources and Contracts PDS Committee to consider recommending the Executive agree to expand the empty homes premium to apply to properties empty for more than one year to take effect as soon as possible under the relevant national legislation.**

The Meeting ended at 8.53 pm

Chairman

Report No.
CSD26010

London Borough of Bromley

PART 1 – PUBLIC

Title: **PROCUREMENT: SUPPORTING SMALL BUSINESSES**

Decision Maker: **EXECUTIVE, RESOURCES AND CONTRACTS PDS COMMITTEE**

Date: **19th January 2026**

Decision Type: Non-Urgent Non-Executive Non-Key

Contact Officer: Laurence Downes, Assistant Director Governance & Contracts
Tel: 0208 3134805 E-mail: Laurence.downes@bromley.gov.uk

Chief Officer: Tasnim Shawkat, Director of Corporate Services

Ward(s): All Wards

1. REASON FOR REPORT

- 1.1 This report provides an overview of the approach to removing barriers to engagement with Small and Medium Sized Enterprises (SME's) when conducting procurement in Bromley.

2. RECOMMENDATION(S)

- 2.1 The Committee is recommended to note the report.

3. KEY SUMMARIES

Financial

1. Cost of proposal: No Cost:
 2. Ongoing costs: Not Applicable:
 3. Budget head/performance centre: N/A
 4. Total current budget for this head: £N/A
 5. Source of funding:
-

Legal

1. Legal Requirement: Statutory Requirement: Further Details The Procurement Act 2023
 2. Call-in: Not Applicable:
-

Background Documents: (Access via Contact Officer)	Contract Procedure Rules Local Rules OK!
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4. BACKGROUND/OPTIONS

- 4.1 This paper provides an overview of the approaches to removing barriers to Small and Medium Sized Enterprises (SMEs) when carrying out procurement in Bromley. It sets out where we are now and areas of future development.

THE PROCUREMENT REGULATIONS

- 4.2 Bromley Council is a contracting authority and is subject to the requirements of the Procurement Act 2023, hereafter referred to as the Regulations.
- 4.3 The Council must carry out procurement in compliance with the Regulations. In particular, we must treat all suppliers equally. This means we cannot design a procurement with the intent to confer any advantage or disadvantage to any particular supplier.
- 4.4 However, the Regulations also specify that we must give regard to the fact that SMEs may face particular barriers to participation and to consider whether such barriers can be removed or reduced.
- 4.5 The Regulations do not set out how this may be achieved but other areas of the Regulations indicate the regard that may be given, including:
- An emphasis on preliminary market engagement prior to a tender. This could be an opportunity to raise awareness of the opportunity with SMEs; or to seek feedback from SMEs on the design of the procurement with a view to removing or reducing barriers to participation.
 - A duty to consider Lots – could the goods, services or works be reasonably supplied under more than one contract? However, this consideration can conflict with the duty to give regard to value for money, for example paying a higher overall contract price and additional contract management costs than might otherwise have been achieved as a single contract.
 - Ensuring that conditions of participation for a tender are proportionate. This includes not requiring insurance related to the performance of the contract to be in place before the award of the contract; or not requiring audited annual accounts except from suppliers that are required to have them in place under the Companies Act 2006.
- 4.6 We must also give regard to the published National Procurement Priorities which emphasise the duty to remove or reduce barriers to participation and to seek to maximise procurement spend with SMEs and the Voluntary Sector.

POTENTIAL CHANGES TO THE PROCUREMENT REGULATIONS

- 4.7 Proposals are currently under consultation to add additional requirements or flexibilities under the Regulations. If adopted, they may be enacted into legislation in 2026. Key proposals include:
- A requirement to set targets for annual spend with SMEs and the Voluntary Sector.
 - A requirement for annual reporting of spend with SMEs and Voluntary Sector organisations.
 - The ability to restrict Below Threshold Open Tenders to organisations based in Bromley and neighbouring boroughs.

WHERE ARE WE NOW?

4.8 Management information on SME and Voluntary Sector procurement spend is limited. All contracts over £30k are expected to be recorded on the Councils Contracts Database and each entry should record whether the provider is SME or Voluntary Sector. This can provide a good indication of SME volume and spend under our recorded contracts but with caveats. The data is reliant upon accurate identification, provided by Contract Owners, of the status and location of the supplier. It also does not report live spend data, only the original estimated annual value at award.

4.9 A significant amount of third party spend with SMEs and the Voluntary Sector will not be recorded on the Contracts Database. This includes low value contracts and spot purchased placements. There are no mechanisms in place within our financial systems currently to identify and report on SME spend in these areas and so the extent of our SME spend – of which low value contracts are likely to be a high proportion – is under reported.

4.10 An analysis of a 2025 snapshot of the Contracts Database gives the following breakdown of our recorded contracts:

	Total	Percentage
TOTAL SUPPLIERS	435	100%
<i>of which</i>		
SMEs	303	70%
Large Organisations	132	30%

	Total	Percentage
TOTAL ANNUAL CONTRACT VALUE	£ 260,131,987	100%
<i>of which</i>		
SMEs	£ 154,827,059	60%
Large Organisations	£ 105,304,929	40%

	Total	Percentage
TOTAL SUPPLIERS	435	100%
<i>of which</i>		
Bromley Based	98	23%
Regionally Based (London, Kent, Surrey)	214	49%
Wider UK	120	28%
International	3	1%

	Total	Percentage
TOTAL ANNUAL CONTRACT VALUE	£ 260,131,987	100%
<i>of which</i>		
Bromley Based	£ 76,601,787	29%
Regionally Based (London, Kent, Surrey)	£ 128,999,202	50%
Wider UK	£ 54,494,700	21%
International	£ 36,301	0%

- 4.11 Based on the information available – and noting the caveats - 70% of our recorded contracts are placed with SMEs, equating to 60% of the overall annual value of all recorded contracts. 23% of all recorded contracts are with Bromley based suppliers, equating to 29% of the overall annual value of all recorded contracts. Nearly three quarters (72%) of all recorded contracts are with either Bromley or Regional (London, Kent, Surrey) providers with a similar proportion (79%) of overall annual value.
- 4.12 There is no widely used benchmarking information available so we are unable to gauge how this compares with other local authorities. As noted in 4.7, there are potential changes to the Regulations that may require annual reporting of spend with SMEs. If implemented, this may provide further data for comparison.

WHAT DO WE DO NOW?

- 4.13 We currently have the following policies, actions or initiatives to reduce barriers to participation for SMEs.

Local Rules OK!

- 4.14 Our Contract Procedure Rules have been revised to give more flexibility to commissioners to use *Closed Tender* or *Request for Quotes* procurement routes for *Regulated Below Threshold* procurements, with the *Local Rules OK!* policy applying when these routes are used.
- 4.15 *Regulated Below Threshold* procurements are procurements with a value below the thresholds set out in the Regulations – broadly £215k for Goods and Services or £5.37m for Works.
- 4.16 *Closed Tender* or *Request for Quotes* procurement routes enable providers to be directly invited to submit tenders (as opposed to an *Open Tender* where the opportunity is advertised). This means that commissioners can identify suitable providers to be directly invited to bid, giving them the ability to consider the size and locality of the organisations they wish to engage with.
- 4.17 *Local Rules OK!* is a procurement policy requirement that, where a *Closed Tender* or *Request for Quotes* procurement route is to be used, the providers to be invited must, where possible and appropriate, include SMEs and at least one Bromley based provider.
- 4.18 *Local Rules OK!* allows commissioners to directly engage with SMEs and Bromley based providers. This also ensures that these providers are more likely to bid as they will be more inclined to invest time in submitting a bid knowing that their chances of success will be higher compared to an *Open Tender* route where the volume of competition is uncertain.
- 4.19 This mechanism should be one of the biggest drivers to remove barriers to participation for SMEs and local businesses. However, it is reliant upon commissioners to take proactive action to identify SMEs and local businesses to participate. It is also limited to *Regulated Below Threshold* procurement only – it cannot be applied to *Above Threshold* procurements which must be advertised.
- 4.20 The *Local Rules OK!* policy is attached as Appendix A.

Preliminary Market Engagement

- 4.21 Commissioners are encouraged to use preliminary market engagement prior to tender to both raise awareness of the opportunity amongst providers and also to obtain input from the market on the design of the tender process. Commissioners are asked to use preliminary market engagement as an opportunity to raise interest and awareness with SMEs and local suppliers;

and, in particular, to obtain a better understanding of the potential barriers to SMEs which should in turn inform the design of their specification and the tender process.

- 4.22 For *Closed Tenders* and *Request for Quotes* procurement routes, preliminary market engagement should be used to assist in identifying and engaging with suitable providers to be invited to bid, especially SMEs and Bromley based providers.

Gateway 1 Proceeding to Procurement

- 4.23 Prior to commencing a procurement, a Gateway 1 Proceed to Procurement report must be completed for all procurements from £30k (inc. VAT). In particular, the report template asks commissioners to set out their approach to market engagement and what consideration they have given to reducing barriers to participation for SMEs. This is intended to ensure that these areas are considered by commissioners prior to commencing a procurement.

Procurement Team Design

- 4.24 The Corporate Procurement Team works proactively with Commissioners to give consideration to removing barriers to participation for SMEs. This includes considering the Invitation to Tender and Conditions of Participation requirements to ensure that they are proportionate to the requirement. For example, this may include consideration of Bond requirements or minimum financial turnover requirements. This needs to be balanced against risk to the Council.
- 4.25 Further, the Corporate Procurement Team advises Commissioners on the complexity of the procurement and tender process, simplifying where possible. The Corporate Procurement Team have recently updated all template documentation, with SMEs and Voluntary Sector in mind, to make the language and processes simpler and clearer where possible. These are under constant review.
- 4.26 Examples include adapting the procurement process for vehicle repair requirements where the market was expected to be SME local garages. An Approved List process was used, rather than a full tender, with the simplest tender process possible to allow engagement with local businesses that otherwise would not have engaged.

Procurement Team Business Engagement

- 4.27 The Corporate Procurement Team has developed links with local small business organisations such as the Bromley Federation of Small Businesses and has given several presentations at local events on procurement in Bromley.

The Economic Development Service

- 4.28 The Economic Development Service (Renewal, Recreation and Housing) operating under the 'Opportunity Bromley' inward investment brand provides significant support, advice and guidance to small businesses in Bromley, utilising grant funding to provide a wide range of support and development opportunities. Supporting Local Business is a key investment priority within the Bromley Growth Plan (2024-27) and has delivered the following benefits:
- **Comprehensive SME Support:** The programme has supported five key projects, providing critical support to SMEs through advisory services, networking opportunities, supply chain access, and sustainability guidance.
 - **Business Growth and Job Creation:** The programme has supported 706 enterprises and 190 entrepreneurs to start and grow their businesses and take advantage of local supply chains and the Green economy, generating over £3.7m in net GVA. It has strengthened business resilience,

and exceeded targets for enterprises receiving non-financial support, contributing to Bromley's economic development.

- **Sustainability and Innovation:** The Greener Bromley project has promoted sustainable business practices through Green Mark accreditation, while Growth Builder and Supply Bromley have enhanced business strategies and procurement opportunities.
- **Stronger Business Community and Digital Reach:** Start Up Bromley has built a network of over 900+ businesses, and the Bromley Business Hub has improved knowledge sharing and digital visibility, expanding engagement and market presence.

4.29 In particular, the Economic Development Service leads on specific initiatives relating to breaking down barriers for small businesses in procurement:

- **Business Website:** the new (and expanded) Opportunity Bromley website will contain a specific directory of business support products and services including specific ways to understand and engage with procurement opportunities in Bromley and more widely.
- **Small Business Supply Chain Advisors:** a contract has been in place for the past three years to provide direct support, advice and guidance to small businesses on engaging with procurement opportunities and with supply chains.
- **Small Business Events:** A Bromley High Growth Network has been established with the borough's known 'scale up' businesses in parallel with a range of events (such as Meet the Buyer) with small businesses and small business organisations to advise on engaging with procurement opportunities.

4.30 The Economic Development Service also has a critical role in facilitating introductions for Bromley based SMEs to appropriate Council commissioners. This will help commissioners to identify suitable SMEs and local businesses to participate in Regulated Below Threshold procurement exercises.

WHAT COULD WE DO IN THE FUTURE?

4.31 There are a number of opportunities for further exploration and adoption. Some of these may build on existing policies and procedures. Others may be in response to potential legislation. And there are new initiatives that can be explored. However, a potential limiting factor is capacity, resource and cost in implementing and sustaining new initiatives.

Policy

4.32 While we have existing specific policies such as *Local Rules OK!* as well as broader policies such as Making Bromley Even Better, there are currently no Council wide policies that specifically address and set out our expectations for engagement with SMEs and Voluntary Sector organisations and removing barriers to participation in procurement.

4.33 In July 2025, the Council approved new Contract Procedure Rules. Within the Contract Procedure Rules was a commitment to developing a *Bromley Procurement Priorities* policy for agreement by the Council. Once agreed, the Contract Procedure Rules will be updated to reflect the agreed policy. This document is intended to complement the National Procurement Priorities that contracting authorities must give regard to under the Regulations.

4.34 *Bromley Procurement Priorities*, subject to Member agreement, will set out the wider policy objectives that procurement in Bromley is expected to contribute to, where relevant and

proportionate. This may include areas such as the local economy (building on the existing Local Rules policy), tackling loneliness and social value. Within that document, it is intended to set out specific policy aims and objectives for removing barriers to SMEs when carrying out procurement in Bromley.

- 4.35 *Bromley Procurement Priorities* will be developed for agreement in 2026 with an aim to set out our specific policies for removing barriers to participation for SMEs in procurement. This will ensure we have clear policy and guidance in place so that officers are clear on the Council's expectations to support SMEs where possible and that the Council can demonstrate its priorities and approach to the business sector.
- 4.36 *Bromley Procurement Priorities* will also seek to develop our broader social criteria policy and processes, designed to emphasise support to SMEs and the Voluntary Sector. Potential areas for development include the approach to social value evaluation criteria for larger procurement projects with a particular emphasis on supply chain requirements, such as encouraging providers to commit to engaging with SMEs and Bromley local businesses as potential subcontractors.
- 4.37 Other Areas that may be considered for inclusion within *Bromley Procurement Priorities*, subject to Member decision, that are intended to support broader social value aims and specifically supporting SMEs include:
- A lead Councillor for social value.
 - Consideration of resource for a principal officer(s) to lead on social value, and specifically engagement with SMEs and the Voluntary Sector.
 - Promote and strengthen Key Performance Indicators and action plans for social value within commissioning strategies and Gateway 1 reports.
 - Explore standard approaches for measuring and monitoring social value performance as part of contract management.
 - Ensuring Bromley Procurement Priorities are visible on the Council website and publicised to the local SME and Voluntary Sector market.
 - Develop a programme of social value and SME engagement training for commissioners across the Council.

Management Information, Reporting and Target Setting

- 4.38 Aligned with any agreed policy, consideration should be given to target setting for engagement with SMEs. Clearly, if targets are to be set, then we must have the management information mechanisms in place to be able to accurately report on the baseline and progress against any agreed targets, with an understanding and agreement of the cost and/or resource implications in doing so.
- 4.39 As set out in 4.7 above, consultation is currently in progress on potential amendments to the Regulations to make it a requirement for contracting authorities to set and report on targets for SME and Voluntary Sector procurement spend. It is unwise for Bromley Council to set its own targets at this time or to implement changes to management information systems at potential cost until the specifics and definitions of the new requirements are known; to do so may result in unnecessary duplication of time and cost in amending policy, targets and management information functionality to comply with the details of new requirements once they are known.

- 4.40 Therefore, it is recommended that we do not progress with target setting or management information functionality at this time. In the interim, officers will review the current financial and reporting systems to determine what may be possible in developing management information functionality in anticipation of the new requirements; and what steps and costs may be required to do so.

Commissioning - Market Engagement and Procurement Design

- 4.41 Policy and guidance are already in place to set expectations of Commissioners in giving consideration to engaging with SMEs and removing barriers to participation and these will be strengthened with the introduction of the *Bromley Procurement Priorities* policy. However, continuous effort should be made to ensure that these policies are put into practice.
- 4.42 Commissioners must complete the Gateway 1 Proceeding to Procurement report prior to commencement of any procurement of £30k (inc. VAT) or higher and this is expected to be completed sufficiently in advance of the commencement of any procurement process, whether this is an Officer or Member decision, to proceed.
- 4.43 The Gateway 1 template will be revised in 2026 and will strengthen the section on market engagement. The revised section will ask Commissioners to set out their approach to market engagement in more detail, including how they have considered SME and local business participation and how they have removed barriers where possible.
- 4.44 Officers and Members, when approving proceed to procurement decisions, will be asked to give particular scrutiny to the market engagement section of the procurement strategy. This will help to reinforce expectations and drive behaviour to ensure policy is put into practice. The Corporate Procurement Team will ensure market engagement and removing barriers is highlighted as part of the Procurement Checklist when planning procurement projects with Commissioners.

Communication and Information

- 4.45 The information on the Bromley Website for SMEs on procurement advice, guidance and opportunities is limited. An objective for the Corporate Procurement Team is to develop the information available on the website further to be a more useful tool for SMEs in finding information on procurement opportunities in Bromley.
- 4.46 This will be reviewed by the Corporate Procurement Team in 2026 with an action plan to improve the content. Resource is a limiting factor in the progress of this objective.

Market Knowledge

- 4.47 In partnership with the Economic Development Service, the Corporate Procurement team will explore potential mechanisms for improving market knowledge resources for Commissioners.
- 4.48 Currently, there are no corporate databases or record keeping for the storing of information on local businesses or SME providers. Market knowledge is reliant on individual Commissioners and the level of knowledge or records held will vary from team to team. Market information will be limited to soft records (e.g. emails) that may have been retained by teams; or available directories such as the Bromley Business Directory.
- 4.49 The Corporate Procurement Team receives dozens of speculative emails from businesses which are typically forwarded on to the relevant Commissioning Team and not retained. There may be an opportunity to utilise such information to support Commissioners in their market knowledge. Similarly, such data could be made available as part of a tender process where providers may be seeking information on potential subcontractors.

4.50 These discussions are in very early stages and resource and costs will be a factor in determining the possibility (and sustainability) of such mechanisms, as well as ensuring no duplication of existing mechanisms that achieve the same purpose.

5. TRANSFORMATION/POLICY IMPLICATIONS

12.1 Making Bromley Even Better Priority:

(3) For people to make their homes in Bromley and for business, enterprise and the third sector to prosper.

(5) To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents.

Appendix A

Local Rules OK! attached.

Procurement Practice Note:

Local Rules OK!

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Document Owner	Procurement Team
Original Production Date	c. 2012
Last Review Date	10 November 2025
Reviewer Name	Laurence Downes
Scheduled Review date	November 2026

1. Context of this practice note

- 1.1. This Procurement Practice Note should not be read in isolation from the other requirements stated and identified in the Council's Contract Procedure Rules (CPRs) and the overarching actions it describes to provide for fair, transparent and legal arrangements in the placement of contracts for works, goods and services.
- 1.2. If you have any queries on the content of this practice note, please contact Procurement@bromley.gov.uk.

2. Introduction

- 2.1. Local Rules OK! refers to the purchasing of goods or services from a local supplier, including SMEs.
- 2.2. For the purpose of this policy, a local trading organisation is one which is an organisation or company with a business address within the Borough. In this policy, a business address refers to the address to which an order is sent, even if they have a Head Office or other addresses outside of the Borough)
- 2.3. Typically, these suppliers will be small and medium enterprises (SMEs). To compete for bidding and contracting opportunities local SMEs may need additional support to bring them up to the required operational, safety, environmental and technical standards.
- 2.4. Using Local Rules OK! contributes to the local economy and economic growth that supports social outcomes.
- 2.5. It contributes to a vibrant and healthy community, and helps protect, promote and enhance the environment.

3. Purpose

- 3.1. Local Rules OK! is a procurement policy to encourage greater use of local trading organisations when seeking competitive quotations for requirements with a total value below the thresholds set out in the Procurement Regulations (Regulated Below Threshold procurements).

4. Requirements of this policy

- 4.1. If following a procurement process that does not involve advertisement for a requirement of a value of less than the relevant threshold as set out in the Procurement Regulations, a quotation, via a Closed Tender or a Request for Quotes process, should be requested from a suitable business that is based in the Borough, wherever possible.
- 4.2. If an advertised process is being used, then officers may encourage participation from local trading organisations, and may use adverts to bring the opportunity to the attention of local trading organisations in consultation with the Procurement Team.
- 4.3. If no suitable local trading organisations can be found, then either an advertised process may be used, or non-local trading organisations may be invited. However, the arrangements identified are also intended to be driven by the business needs of the service (and for that reason are not mandatory) as there will be occasions when, because of specific requirements, it is not possible to nominate or use a local provider. Where problems of this type are identified the matter should be discussed with the Procurement Team to see if a local arrangement can be developed in line with the aims and objectives of this policy.

5. Relation to the Council's CPRs

- 5.1. Section 4 of the CPRs sets out the Council's requirements around competitive tendering and the receipt of quotations for certain thresholds of activity. As is the norm, while these requirements are by necessity more demanding as the value and complexity of the contracting arrangement increases, they also provide for a more relaxed approach where requirements are estimated to be below the thresholds set out in the Procurement Regulations.
- 5.2. As covered under the Council's CPRs, prior to procurement, consideration must be given to social value implications. , and this includes the consideration of sustainable procurement matters which it defines as *"....a process whereby an organisation meets their needs for goods, services works and utilities in such a way that achieves Value For Money on a Whole Life Basis in terms of generating benefits, not only for the organisation, but also society and the economy, while minimising damage to the environment."*
- 5.3. The Council endorses the use of whole life costing in the way it values its contracting arrangements. While care must be taken not to disaggregate spend in a way which does not represent Value for Money or might be viewed as being non-compliant with legislative requirements, there is still opportunity to legitimately direct spend towards SME/local businesses and the benefits this can provide for the local economy and community.

6. Where to seek local trading organisations

- 6.1. There are a number of places to find out about local trading organisations and local SMEs.
- 6.2. The following directories can be used to locate local suppliers. It is also recommended that officers use their own knowledge of a particular market and conduct their own desk-based research.
- BID (Business Improvement District) managers have own websites and directories:
 - Bromley (<https://yourbromley.com/directory>),
 - Orpington (<http://www.orpington1st.co.uk/bid/>),
 - Beckenham (<https://beckenhamtogether.co.uk/>)
 - Penge (<https://pengese20.co.uk/businesses-in-penge/>).
 - The Bromley Directory, provided by My Business Client - <http://www.itslocalbromley.co.uk/bromley/desktop/index.html>

7. Facilitating responses from local trading organisations

- 7.1. If officers have chosen to advertise their opportunity, it may be useful to consider alternative advertising methods (in addition to meeting statutory obligations). For example, advertising in local publications (such as the News Shopper) or via the Bromley Business e-bulletin. However, you must arrange any alternative advertisement in liaison with the Procurement Team as this can lead to additional notice requirements in order to ensure compliance.
- 7.2. Following 2.3 above, typically local markets may be largely composed of SMEs. If the market you are seeking supplies from is largely composed of SMEs, you may need to consider whether amendments need to be made to the tendering and procurement process in consultation with the Procurement Team. For example, requirements may include:
- Additional time for submitting responses.
 - Reducing the usual requirement level or lowering minimum thresholds.
 - Training on how to use the e-tendering system.
 - Increased levels of supplier engagement.

8. Concluding words

- 8.1. Within the context of the above, officers are required to consider the nomination of at least one local trading organisation when they are undertaking a competitive request for quotations process. Remember that by using a local company, the Council (through you) is actively investing in its community. Spending locally boosts the local economy creating more local business opportunities and more jobs.

9. Contact details

- 9.1. If you should have any queries about the interpretation of this practice note, please do not hesitate to contact the Procurement Team Procurement@bromley.gov.uk

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Report No.
FSD26004

London Borough of Bromley

PART 1 – PUBLIC

Title:	RISK MANAGEMENT		
Decision Maker:	EXECUTIVE, RESOURCES AND CONTRACTS POLICY DEVELOPMENT AND SCRUTINY COMMITTEE		
Date:	Monday 19th January 2026		
Decision Type:	Non-Urgent	Non-Executive	Non-Key
Contact Officer:	Tasnim Shawkat, Director of Corporate Services and Governance – Corporate Services Risk Register Tel: 020 8461 7899 E-mail: tasnim.shawkat@bromley.gov.uk Peter Turner, Director of Finance – Finance Risk Register Tel: 020 8313 4338 E-mail: peter.turner@bromley.gov.uk Charles Obazuaye, Director of Human Resources, Customer Services and Public Affairs – Human Resources and Customer Services Risk Register Tel: 020 8313 4335 E mail: charles.obazuaye@bromley.gov.uk		
Chief Officer:	Peter Turner, Director of Finance		
Ward(s):	All Wards		

1. REASON FOR REPORT

- 1.1 This report provides the Executive, Resources and Contracts Policy, Development and Scrutiny Committee with the current iteration of the Corporate Risk Register, together with those for the Corporate Services, Finance, and Human Resources and Customer Services departments.

2. RECOMMENDATION

That the Executive, Resources and Contracts Policy, Development and Scrutiny Committee review and comment on the Risk Registers and direct any queries they may have to the relevant Contact Officer.

3. KEY SUMMARIES

Financial

1. Cost of proposal: Not Applicable:
 2. Ongoing costs: Not Applicable:
 3. Budget head/performance centre: Not Applicable
 4. Total current budget for this head: £ Not Applicable
 5. Source of funding: Not Applicable
-

Legal

1. Legal Requirement: None
 2. Call-in: Not Applicable
-

Background Documents: (Access via Contact Officer)	N/A
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4. BACKGROUND/OPTIONS

- 4.1 This report provides Members of the Executive, Resources and Contracts Policy, Development and Scrutiny Committee with the most recent iterations of the Risk Registers falling within their remit.
- Corporate Services (Appendix A)
 - Finance (Appendix B)
 - Human Resources and Customer Services (Appendix C)
 - Corporate (Appendix D)
- 4.2 Each Director retains responsibility for the risks and controls within their division, and for their Departmental risk registers. The Corporate Risk Register is owned by Chief Officer Executive (COE) and the Corporate Leadership Team (CLT) as a collective and is reviewed by these two groups on a quarterly basis. The most recent review was December 2025.
- 4.3 Internal Audit coordinates the Risk Management process via the Corporate Risk Management Group and the Audit and Risk Management Committee. In line with the risk reporting cycle, the Corporate Risk Management Group met in October 2025 to discuss cross cutting issues. Audit and Risk Management Committee last reviewed the Corporate Risk Register at their meeting on 6th November 2025.
- 4.4 The risk registers in full were last presented to ER&C PDS on 15th September 2025.
- 4.5 Since the last risk reports to Members as referenced in paragraphs 4.3 and 4.4, there have been the following key changes:
- **Addition** of 'Polygamous Working' risk to both the Corporate Risk Register and the Human Resources and Customer Services Risk Register
 - **Addition** of 'Provider Failure' to the Corporate Risk Register
 - **Refresh** of the Human Resources and Customer Services departmental **Health and Safety Risks**, merging them into one 'Failure to comply with statutory health and safety requirements' risk.
 - **Refresh** of the Human Resources and Customer Services departmental **recruitment and retention risks** and **failure to comply with legislation risks**.
- 4.6 There have also been some minor updates to other individual risks in terms of causes / effects / controls and further action required since the last formal review.
- 4.7 Net high risks for the divisional risk registers, with updated additional commentary, will be presented at the next risk report to this Committee.

5. FINANCIAL IMPLICATIONS

- 5.1 The Finance department's Risk Register is attached as Appendix B. Where applicable, the risk category in all registers is reflected as 'Financial, Operational'.

6. LEGAL IMPLICATIONS

- 6.1 Where applicable, the risk category in all registers is reflected as 'Legal, Operational'.

7. PERSONNEL IMPLICATIONS

- 7.1 The Human Resources and Customer Services Risk Register is attached as Appendix C. Where applicable, the risk category in all risk registers is reflected as 'Personnel, Operational'.

8. PROCUREMENT IMPLICATIONS

- 8.1 Where applicable, the risk category in all registers is reflected as 'Contractual and Partnership'.

9. PROPERTY IMPLICATIONS

- 9.1 Where applicable, the risk category is reflected as 'Physical / Property', which includes hazards/risks associated with buildings.

10. IT IMPLICATIONS

- 10.1 Where applicable, the risk category is reflected as 'Data and Information'.

11. TRANSFORMATION/POLICY IMPLICATIONS

- 11.1 Making Bromley Even Better Priority:
(5) To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents.

12. IMPACT ON VULNERABLE ADULTS AND CHILDREN

- 12.1 There are no direct implications for Vulnerable Adults and Children arising from the attached Risk Register extracts, although failure of the Council to meet its commitments in any risk area could indirectly impact on life chances.

Corporate Services Risk Register - Appendix A

THE LONDON BOROUGH													DATE LAST REVIEWED:		14/11/2025
REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press alt & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			FURTHER ACTION REQUIRED	RISK OWNER		
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING				
1	Corporate Services	IT Security failure	Cause(s): Failure of IT Security (responsibility across Bromley & BT) to manage risk of attack or intrusion leading to potential corruption / loss of data / loss of systems Failure of System manager where Digital & IT service (including BT) do not manage the system Failure to comply with relevant legislation (GDPR) Failure to ensure the confidentiality, integrity, and availability of information assets. Failure of officer action where human error/non-compliance with policy and best practice leads to compromise Effect(s): 1. Distress and/or physical impact on wellbeing of customers 2. Impact on operational integrity 3. Reputational damage to services and the authority as a whole 4. Liability in law 5. Economic damage to authority and/or customers 6. Impact on service take up due to reduced confidence from the public	Data and Information	4	5	20	-Application of effective security management including effective application of anti- virus protection and security measures through the IT Contract with BT - Regular Penetration Testing undertaken - Information Security Team in place - Patch updates undertaken regularly - LBB is currently compliant with the Public Services Network Code of Connection (PSN CoCo), DSP Toolkit and PCI-DSS (Payment Card Industry standards) The LBB Corporate Leadership Team formally accept the above certifications as the basis of LBB's internal information governance and security program. These standards are based on the ISO27001 international best practice and NCSC guidance for managing information security and are therefore fit for purpose for assessing and managing the Council's information risk - Information Security & Data Protection Training programme in place - Induction programme in place - Security Operation Centre(SOC) has been implemented which proactively monitor of the LBB Data and Infrastructure. - CAF (Cyber assessment framework) through Local Digital (MHCLG) in progress to mature cyber resilience - DAta protection and securityimpact assessments in place for changes to processing activities	3	5	15	Cyber Assessment Framework Stage 2 completion for assessment - April 2026 Maturing of Cyber incident response playbooks Undertake table top exercise to test cyber resilience plans Mature Joiners, Movers, leavers process Funding has been awarded by MHCLG to improve cyber resilience, a plan is to be detailed on how to use the funding effectively	Vinit Shukle		
2	Corporate Services	Telecommunications failure Prolonged telecoms / switchboard failure	Cause(s): Power surge, contractor failure, malicious attack, IT failure Effect(s): Widespread disruption across the Council	Data and Information	3	5	15	- Stand-by arrangements available so that in the event of failure highest priority services can be recovered - Technical design takes into account the criticality of systems and ensures, where justified, that additional resilience is built in - All Critical Services now have additional independent lines as contingency (if not their first line) - Additional resilience in use of LBB mobile phones - The ICT Disaster Recovery Plan is in progress - Working with BT to implement disaster recovery arrangements as part of new backup contract - Effective application of anti-virus protection and security measures through the IT contract with BT - 50% of servers from the Data Centre have already been moved to Azure (Microsoft Cloud) with DR capabilities.	2	3	6	- Virtualisation project will help facilitate disaster recovery provision - Secondary Session Initiation Protocol (SIP) connection being added to provide resilience. - Remaining Servcers that are compatable with Cloud Technologies will be moved into Azure (Microsoft Cloud) with DR Capabilities by end of next quater	Vinit Shukle		
3	Corporate Services	IT System Failure (partial loss) Partial loss of IT systems	Cause(s): Failure of Outlook or similar applications Failure of Novell Filing Registry system which carries details of all departmental files Effect(s): Widespread disruption across the Council	Data and Information - Operational	4	4	16	- Effective incident management / support and resilient systems in use so that single points of failure are minimised - Technical design that takes into account the criticality of systems and ensures, where justified, that additional resilience is built in - Ensure proactive monitoring tools are in place to highlight potential issues before there is a major incident - System now migrated to the server - No longer dependent on Win7 - all services successfully transferred. However, the Novell filing registry/Regnet system has no further upgrade options and is not compatible with Win10 which will be deployed before December 2019 (Win7 support expiry date)	4	3	12	The Norwell System is currently used by legal team for historical file information only on a 'stand alone' PC. As part of any future platform upgrades, investigation will need to be carried out as to whether this option is still viable (by way of impact assessment) or look at migrating the historical data into Norwel (the current system).	Vinit Shukle		
4	Corporate Services	IT System Failure (total loss) Complete failure of IT systems resulting in widespread disruption across the Council	Cause(s): Complete loss of data centre and related hardware Effect(s): Widespread disruption across the Council Financial loss Reputational impact	Data and Information - Operational	3	5	15	- Effective incident management / support and resilient systems in use so that single points of failure are minimised - Technical design that takes into account the criticality of systems and ensures, where justified, that additional resilience is built in - Ensure proactive monitoring tools are in place to highlight potential issues before there is a major incident - Backup power arrangements in the event of power issues (most likely) - Server room has fire suppression, water detection and significant physical security measures have been undertaken.	2	4	8	- Property are planning additional works to resolve the issues that caused the outages, but until then we remain at an elevated risk.	Vinit Shukle		
5	Corporate Services	Network Loss Loss of the customer service centre network as a result of a major malfunction of the council's network, leading to system access loss preventing staff from processing service requests.	Cause(s): Major malfunction of council's network caused by Cyber Attack or other means Effect(s): Loss of system access Service Disruption Reputational impact	Data and Information - Operational	3	3	9	- Existing local resilience procedures (over Liberata network via Citrix) - Business Continuity Plan and manual procedure plans in place - Prepared for use of smart telephony messaging, web banner message and reception signage	3	2	6	Priority Systems are being moved into Azure Cloud	Vinit Shukle		
6	Corporate Services	Laptop Manufacturer/Provider Issue Current model of corporate laptop in constraint	Cause(s): Delays/constraints in production due to Pandemic issues and/or component availability Effect (s): IT will not be able to deliver laptop requirements for new starters or provide additional laptops for existing staff		3	3	9	BT managing the hardware roadmap with third party supplier Alternative specification laptop sourced Rolling stock management in place	1	1	1	Alternative make and model of laptop be sourced, and tested with corporate build for compatibility and performance	Vinit Shukle		

Corporate Services Risk Register - Appendix A

												DATE LAST REVIEWED:	14/11/2025
REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press alt & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			FURTHER ACTION REQUIRED	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
8	Corporate Services	Effective governance and management of information	Cause(s): - Lack of organisational buy-in from information asset owners - Lack of governance and oversight of information sharing agreements - Poor awareness / education in understanding purpose and lawfulness of information use - Irresponsible use of AI tools such as Copilot, ChatGPT and Gemini Effect(s): - Breach of statutory obligations through failure of compliance with relevant legislation e.g. GDPR, UK DPA, FOIA, EIR - potential fines - reputational loss - increased information security attack surface - increased storage costs for on-prem data	Data and Information - Operational	4	4	16	- information governance training provided to all officers - system security reviews - SIEM system monitoring - Data Protection Impact Assessments	3	4	12	-Review of the impacts of the Data Usage and Access Act 2025	Vinit Shukle
9	Corporate Services	Budgetary overspend	Cause(s): Overspending budgets as a result of increased costs outside Council's direct control (e.g. increase in minimum wage, court / legal fees) Effect(s): Financial	Economic - Strategic	4	3	12	- Effective forward budgetary planning - On-going engagement with stakeholders - On-going management of costs, demand forecasting, allocation of existing resources	3	3	9	Identify "risk areas" (eg identify source of funding before committing resources, looking at flexible resourcing, growing our own talent by recruiting at lower grades, managing contracts proactively)	Director of Corporate Services
10	Corporate Services	Failure to follow Legal Advice Breach of law, statutory duty or carrying out inadequate consultation arising from failure of clients to follow Legal briefing procedures	Cause(s): Advice not being sought and/or followed by clients. Effect(s): - Breach of statutory obligations through failure of compliance with relevant legislation (e.g. 'Duty to Consult', EU Procurement Rules, Health and Safety etc.) leading to adverse publicity and significant costs including fines. - Council making unlawful decisions - Potential compensation to injured parties - Negative publicity - Potential judicial reviews	Legal - Operational	3	3	9	- Service procurement procedures reviewed for robustness - Register of all relevant statutory requirements - Regular review of compliance - Effective training of managers in requirements of relevant legislation - Systematic consultation - Robust internal customer service standards and service delivery meetings - Continuous learning and feedback - Statutory requirements (awareness and training)	2	3	6		Director of Corporate Services
12	Corporate Services	Failure to publish Register of Electors	Cause(s): Failure of IT systems Insufficient resources provided to Electoral Registration Officer to deliver a comprehensive canvass Failure to follow legislative and regulatory requirements Effect(s): Disenfranchisement of local residents Potential to challenge any election which relies on an inadequate register Reputational damage	Political - Strategic	2	3	6	Controls: 1. Project Plan including detailed Risk Register 2. Robust documented internal procedures 3. Monitoring by Electoral Commission through appropriate Performance Standards	1	3	3		Carol Ling
13	Corporate Services	Failure to manage election process	Cause(s): Failure of Council in its duty to provide sufficient resources to the Returning Officer Failure of IT systems Effect(s): Costs of dealing with a challenge to election process Reputational damage Cost of re-running an election if result is set aside	Political	3	4	12	- Project Plan including detailed Risk Register specific to election underway - Staff Training - Adequate insurance (Returning Officer - personal liability) - Monitoring by Electoral Commission through appropriate Performance Standards.	2	3	6		Carol Ling
14	Corporate Services	Ineffective governance and management of contracts and procurement	Cause(s): 1. Lack of awareness and/or non-compliance with Procurement Act 2023, Public Contracts Regulations 2015, Provider Selection Regime and Councils Contract Procedure Rules. 2. Lack of awareness and/or non-compliance with decision making and scrutiny requirements. 3. Insufficient engagement with key support services such as Corporate Procurement, Finance and Legal. 4. Poor planning / lack of timely action for commissioning and procurement activities. 5. Poor record keeping of contracts and contract documentation. 6. Insufficient or unclear arrangements for client side contract management and monitoring resource. 7. Failure to undertake a suitable and proportionate contract management and monitoring plan. 8. Failure of a contractor / partner / provider to maintain agreed service levels resulting in an interruption to or deterioration of service delivery. Effect(s): - Failure to ensure Value for Money - Procurement challenges / complaints leading to delays and potential additional costs - Reputational risk - Service disruptions - Contracts do not deliver expected outcomes or deliver sufficient quality - Increased cost and resource to manage contract issues - Failure to achieve our Making Bromley Even Better priorities.	Contract Management Contractual and Partnership	3	4	12	- Gateway process to support and record all relevant procurement decisions - Contract Procedure Rules and regular Practice / Guidance notes to all Contract Owners - Review of contract management and contract monitoring controls including any issues identified by internal audit - Contracts Database and Quarterly Contracts Database Report to all relevant Committees - Quarterly RAG rated contract reports to COE/CLT with individual reports to Contract Owners - Procurement Board oversight - Member scrutiny including regular Contract Monitoring Reports for £1m+ contracts - Regular programme of training delivery to staff - Quarterly Contract Owners meetings	2	4	8	- Procurement Pipeline to support forward planning and to meet new statutory requirements. Bi-annual. First publication by Summer 2025 (COMPLETED). - Completion of Procurement Act 2023 national L&D programme by October 2024 for all Procurement and Legal Contracts officers (COMPLETED). Training offered to all Contract Owners (COMPLETED). - Review of all documentation to ensure compliance with Procurement Act 2023. New documentation in place and constant review based on lessons learned and further guidance received (COMPLETED). - Update and adoption of revised Contract Procedure Rules. In progress with finalisation expected in Summer 2025 (COMPLETED). - Review and updating of Contract Management library, tools, resources and processes. In progress with completion in 2026 - Regular review of Third Party Spend, identification of any strategic procurement and process issues and follow up for remedial action and key messaging. In progress with completion in 2026. - ongoing and repeated high profile key messaging across the Council and monitoring of compliance	Service Directors supported by Assistant Director, Governance and Contracts
15	Corporate Services	Ineffective governance and management of contracts - Contracts Database	Cause(s): - Lack of compliance from contract managers - Unclear ownership - Lack of governance - Poor awareness and/or understanding of the Database Effect(s): - Impacts upon decision making and outcomes - Poor quality data - Failure to meet transparency obligations	Contract Management Contractual and Partnership	3	2	6	1. Database guidance issued to officers; training available 2. Regular monitoring of CDB by Procurement Team 3. Quarterly reporting to Members 4. Procurement Board 5. Regular sample checks of data quality and completeness 6. Regular reminders to Contract Owners	2	2	4	1. Sample check taken Spring 2023 with report to Chief Officers and Contract Owners. Next sample check Spring 2026.	Assistant Director, Governance and Contracts

Corporate Services Risk Register - Appendix A

												DATE LAST REVIEWED:	14/11/2025
REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press alt & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			FURTHER ACTION REQUIRED	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
16	Corporate Services	Information Request non-Compliance	Cause(s): Failure to meet timescales under FOIA, EIR and GDPR Failure to provide suitable answers in respect of these requests or correctly apply exemptions Effect(s): 1. Distress on wellbeing of customers 2. Impact on operational integrity 3. Reputational damage to services and the authority as a whole 4. Liability in law 5. Economic damage to authority due to fines	Data and Information - Operational	4	5	20	1. Operational activities relating to Subject Access and Freedom of Information requests has been transferred to HR and Customer services. Digital & IT services retain policy and governance oversight.	4	4	16	Action: - review Subject Access and Freedom of information policies and procedures - review police requests procedures	Director of Corporate Services/Vinit Shukle

Remember to consider current Internal Audit priority one recommendations when identifying, assessing and scoring risks.

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Appendix B - Finance Risk Register

DATE LAST REVIEWED:														7th October 2025
REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press alt & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			FURTHER ACTION REQUIRED	RISK OWNER	
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING			
1	Finance	Failure to ensure sufficient cover of Council assets This could result in the possibility of our insurance company refusing to cover a claim above the level of our current excess (£125k for general property and Liability, £250k for educational property).	Cause(s): 1. Incorrect/incomplete asset/risk data provided to insurer. 2. Total level of insurance insufficient e.g. to cover damage to multiple high value assets. Effect(s): Inadequate or no insurance cover could have significant financial implications, dependent on the value of the asset and the extent of the damage / loss.	Financial - Operational	3	4	12	1. Property Services and Transport Team review all property, vehicle and school journey schedules annually during renewal process 2. Maintain a register of all insurance premiums paid each year 3. Independent review of Council's self-insurance Claims fund by professional actuaries at each tender 4. Endorsement under buildings insurance policy to cover up to £10m for inadvertent omission to insure property 5. Buildings insurance policy excess per event to protect Council for damage to multiple properties as a result of single event e.g. Flood/Storm 6. Reinstatement valuation to be undertaken every 5 years	2	3	6	- Property Services to review all properties currently insured against the asset valuations and conform cover required.	Viknesh Gill / Amy Milton	
2	Finance	Financial Market Volatility Financial loss arising from the volatility of financial markets.	Cause(s): 1. Market volatility 2. Recession 3. Counterparty/banking failure 4. Other geopolitical risks Effect(s): 1. We do not maximise our interest earnings on balances and/or minimise borrowing costs 2. Loss of capital value of investments 3. Liquidity - insufficient cash to settle liabilities as they become due 4. Others losses from variations in Interest rates, exchange rates, Inflation, refinancing 5. Failure to comply with legal and regulatory requirements and/or reputational damage	Financial - Operational	3	4	12	1. Regular strategy meetings 2. Use of external advisors 3. Regular reporting to E,R&C PDS Committee (Members) 4. Compliance with CIPFA Treasury Management Code of Practice and Prudential Code 5. Treasury management strategy developed in consultation with Link Asset Services and agreed annually by Full Council 6. Investment strategy prioritises security first, portfolio liquidity second and then yield/return. 7. Investment strategy includes clearly defined criteria for counterparty credit rating and investment limits (value and duration) 8. Investments are diversified including pooled funds and sovereign bonds, and considers other Council investments (property) 9. Above target returns from pooled funds set aside in earmarked reserve to mitigate future reduced returns/reduction in capital value	2	4	8		James Mullender	
3	Finance	Capital Financing Shortfall Risk of significant costs increase in the Capital Programme and possible reductions in proceeds from disposals could impact on the Council's ability to fully fund the Capital programme	Cause(s): 1. Property price reductions as a result of the economic environment could have a negative impact on sale proceeds. 2. Limited scope to identify further Council assets for disposal 3. Significant increase in cost of capital schemes due to inflation and supply issues requiring an increase in funding 4. Significant additional costs and future liabilities across the Council's operational estate arising from any further condition survey liabilities not identified at this stage. 5. Requirement to obtain funding for significant new Housing Schemes and impact of higher borrowing costs 6. In February 2025, a report titled Capital Strategy 2025-26 to 2028-29 and Q3 Capital Programme Monitoring to Executive identified a significant capital financing requirement and given the factors identified above there is a risk that significant changes in cost and proceeds could create a new capital financing shortfall that needs to be addressed. 7. Only limited earmarked reserves available to support the capital programme, once other pressures (inc revenue budget gap) are factored in. Effect(s): 1. Without alternative funding, the Council would require drawdown from revenue resources. This would increase the Council's revenue budget gap and/or further deplete earmarked reserves. 2. Increased use of external borrowing would add interest cost pressure to the Council's revenue budget along with Minimum Revenue Provision requirements for repayment of borrowing 3. Schemes would not be able to progress due to lack of funding available although the scope to do this may be limited given the critical nature of some of the works required 4. Potential requirement to sell operational or income generating investment properties to fund capital costs	Economic - Strategy	4	4	16	1. Fundamental review of capital programme undertaken to inform updated Capital Strategy 2023/24 to 2026/27 as reported to Executive in January 2023 - this includes full capital programme, approved asset disposals, mitigations and agreed financing options. 2. Regular reporting to Members via SAG, FSG and Executive 3. Tight control and scrutiny (by finance) of capital spending commitments as they reach the level of business case. 4. Quarterly reports on capital receipts (actual and forecast) to Executive. 5. Members have approved PWLB borrowing to refinance existing housing schemes (£50m via PWLB) and up to £10m support from the Council's earmarked revenue reserves. Subsequent schemes (mainly housing) have increased borrowing to around £159m	3	4	12		James Mullender	
4	Finance	Pension Fund The pension fund not having sufficient resources to meet all liabilities as they fall due	Cause(s): 1. Investment markets fail to perform in line with expectations 2. Market yields move at a variance with assumptions 3. Investment managers fail to achieve their targets over the longer term 4. Longevity horizon continues to expand. Although the triennial valuation reported that the Council's pension fund is fully funded, there is a need to address a future risk of the pension fund not having sufficient resources 5. Deterioration in pattern of early retirements 6. Administering authority unaware of structural changes in an employer's membership e.g. large fall in employee members, large number of retirements 7. Pooling of investments (London CIV) may result in appointment of poorer performing investment managers. 8. Uncertainty in financial markets due to Ukraine situation and possible future de-globalisation which can impact on performance Effect(s): Financial	Financial - Operational	3	5	15	1. Use of external advice. 2. Financial: Monitoring of investment returns - analysis of valuation reports 3. Demographic: Longevity horizon monitored at triennial reviews - quarterly review of retirement levels 4. Regulatory: Monitor draft regulations and respond to consultations - actuarial advice on potential where appropriate 5. Quarterly reports to Pensions Investment Sub-Committee 6. Funding Strategy Statement 7. Statement of Investment Principles 8. Communications Policy 9. Governance Policy 10. Triennial valuation by actuary 11. Strategic asset allocation review.	2	4	8		Director of Finance	
5	Finance	Failure to deliver a sustainable Financial Strategy which meets with Making Bromley Even Better priorities and failure of individual departments to meet budget	Cause(s): 1. The Draft Budget 2026/27 and Update on the Council's Financial Strategy report to Executive 2027/28 to 2028/29 being reported to Executive on 21st January 2026 identified the need to reduce the Council's future years 'budget gap' 2. The outcome of the Government's review of the existing local government finance system (now known as Fair Funding 2.0) has resulted in real terms funding reductions of £10m in 2026/27 increasing to £30.5m per annum from 2028/29. The significant levels of cost/growth pressures relating to SEN, social care and homelessness continue and there remains uncertainty relating to future cost increases arising from service inflation for some time. These factors can have a significant impact on the future years' 'budget gap'. 3. Failure to meet departmental budgets due to increased demand on key services resulting in overspends: housing (homelessness and cost of bed and breakfast); adult social care (demographic changes including ageing population); children's social care, education (central costs, high needs transport and DSG deficit), waste (growing number of households), Dedicated Schools Grant deficit increases and limited delivery of planned mitigation savings. 4. New capital schemes may be required with the associated revenue impact (including financing) adding to the Council's 'budget gap' to meet. 5. Dependency on external grants to fund services (schools and housing benefits are ring-fenced) - effect if specific grants reduce or cease. 6. Increases in national living wage will have cost implications to the Council over the next few years (e.g. care providers and carers). 7. Local government may be required to take on new funding responsibilities in the future without adequate funding. 8. Ongoing risk of inflation exceeding Bank of England inflation target levels. 9. Failure to identify and highlight frauds and weaknesses in the system of internal control (which invariably have a financial impact). Overall, identified fraud losses are mainly benefit related (Council Tax Support / Single Person Discount). Effect(s): 1. Increased overspends in particular services 2. Council unable to carry out its statutory duties due to services cuts 3. Reputational damage 4. Risk of having to seek Exceptional Financial Support (EFS) or ultimately a Section 114 notice	Financial - Operational	5	5	25	- Regular update to forward forecast - Regular analysis of funding changes and new burdens including full year impact - Transformation options considered early in the four year forward planning period - Budget monitoring to include action from relevant Director to address overspends including action to address any full year additional cost - Mitigation of future cost pressures including demographic changes - Quarterly review of growth pressures and mitigation - Growth Reduction Board chaired by Chief Executive	4	5	20	The Council continues to explore transformation opportunities to help meet the ongoing budget gap. Chief Officers will explore further measures to help reduce the overspend in 2025/26 as reported to Executive in September.	Director of Finance	
6	Finance	Failure of Finance IT systems	Cause(s): Failure of Liquidlogic/LIFT/ContrOCC Failure of Oracle Failure of BACs to pay LBB Effect(s): Inability to pay creditors, calculate payments due to our suppliers / foster carers (Payments Team) or to accommodate charging information for billing clients which could result in fines, penalties and loss of goodwill / reputation.	Contractual and Partnership - Operational	3	2	6	1. Liquidlogic/LIFT/ContrOCC has replaced CareFirst for Care Services payments, financial assessments and charging 2. All systems are backed up daily 3. If systems fail, details of previous payments can be used to make payments with reconciliations carried out when the system is made available again. 4. Manual cheque payments could be raised 5. Close liaison with Liberata (and the system support team) to discuss any problems - escalation procedure works well. 6. Alternative printers being available at Xerox reduces the risk of cheques not being produced due to printer failure 7. Stock control measures in place to ensure cheques are ordered in time 8. BACS payments increasing - solid and dependable	2	2	4	Resolution of issues logged relating to Liquidlogic/LIFT/ContrOCC are being monitored closely, and preventative action taken to mitigate risk	Stephen McGinnes	
7	Finance	Failure of external contractors	Cause(s): Contractor ceases to trade due financial failings. Effect(s): disruption and delays to key services, financial loss and adverse publicity	Contractual and Partnership - Operational	3	3	9	1. Constant review of contractors financial standing 2. Maintaining knowledge and contact with alternative service suppliers	2	3	6		Stephen McGinnes	
8	Finance	Contractor Poor Performance Contractor fails to meet performance expectations across Revs & Bens, Payroll, Pensions, Debtors, Financial Assessments and Accounts Payable	Cause(s): Severe catastrophic IT problems Loss of key staff Organisation experiencing severe financial problems Effect(s): - Delay / non payment of suppliers, customers, staff salaries, pensions. - Delay in assessment and payment of benefit claims - Increase in fraudulent payments - Delayed or non repayment from debtors - Failure to carry out financial assessments and raise charges in a timely manner Resulting in loss of income, loss of HB Subsidy, increased costs, increase in complaints and subsequent loss of good will and / or reputational damage.	Financial - Operational	3	4	12	1. Effective SLAs and contracts in place with a regime of KPIs, service credits and default notices in place 2. Regular operational and strategic meetings monitoring progress and identifying action required 3. Action identified and formally agreed when monitoring key performance areas 4. Formal structures and procedures in place for monitoring and corrective action to minimise risk 5. Process reviewed on an ongoing basis 6. Weekly monitoring of complaints and patterns identified 7. The contractors performance is scrutinised by Members twice a year at PDS. These reports highlight the level income and services provided. They also report on any performance issues and the action being taken to address the issues.	2	4	8		Stephen McGinnes	

Appendix B - Finance Risk Register

DATE LAST REVIEWED:														7th October 2025
REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press alt & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			FURTHER ACTION REQUIRED	RISK OWNER	
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING			
10	Finance	Significant Fraud/Corruption	<p>Cause(s): Increased financial difficulties - external customers, suppliers and internal staff Weaknesses in control that individuals can exploit Staff unaware of fraud risks and therefore do not challenge fraudulent internal / external requests Dishonest staff/suppliers/customers Lack of Management oversight or awareness of fraud risks and suitable measures to control these Culture of the organisation is insufficiently robust to meet the principles of 'failure to prevent fraud' guidance</p> <p>Effect(s): Financial loss Adverse publicity/reputational damage Staff morale lowered Resource implications for investigation Prosecution for 'failure to prevent fraud'</p>	Financial - Operational	4	3	12	<p>1. Staff vetting prior to recruitment 2. Counter Fraud Strategy which sets out managers responsibilities to assess risks in their own areas and implement appropriate controls 3. Financial regulations and local financial procedures with sufficient measures to prevent and detect fraud 4. Whistleblowing policy 5. Fidelity guarantee 6. NFI and London Fraud Hub data matching</p>	3	3	9	<p>1) Implementation of action arising as a result of gap analysis against 'failure to prevent fraud' 2) Planned programme of Fraud Awareness activity 2) Fraud risk assessments to be developed 3) Programme of proactive counter fraud work 4) All staff to complete fraud awareness e-learning (by 31 January)</p>	Francesca Chivers	

Human Resources and Customer Services Risk Register - Appendix C

											DATE LAST REVIEWED:	30.12.2025	
REF	DIVISION	RISK TITLE & DESCRIPTION	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING			FURTHER ACTION REQUIRED	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
1	Human Resources	Failure to comply with HR related legislative requirements e.g. Equality Act 2010 and Employment Rights Act 2025	Cause(s): - Lack of awareness with legislation - Failure to effectively consult staff where appropriate - Indirect / direct discrimination - Human error / lack of understanding - Lack of capacity and capability to deliver - New Employment Rights Act 2025 includes significant day one rights and reduces the qualifying period for the unfair dismissal right from 2 years to 6 months Effect(s): - Reputation damage - Financial costs - Regulatory inspection / intervention	Legal	4	3	12	1. Bromley Council policies & procedures in place e.g., Equality Scheme 2. Requirement to report and record accurate information e.g. equalities 3. Training in place for managers and staff to ensure they are aware of their responsibilities 4. Organisation to carry out a Capacity Risk Assessment	3	2	6	- Professional updates / HR Mgt Team forward planning	Director of HR, Customer Services and Public Affairs
2	Human Resources	1) Ineffective workforce planning initiatives including succession planning, talent management 2) Upskilling of staff - lack of training resources/opportunities	Cause(s): - Insufficient strategic management control and planning -Staff turnover (capacity) - Lack of resources Effect(s): - Potential service delivery impacts - Loss of skilled/experienced staff - Missed opportunity to develop and retain talent "in house" - Recruitment costs	Personnel / Operational	3	3	9	Clear workforce planning strategy in place, including - Graduate Intern Scheme - Apprenticeship Scheme - Career Pathway - Leadership Development Programme - Succession Planning Tool	2	2	4	Review of 1.'Development of a Talent Management Strategy 2. Ensure that Apprenticeship Levy funds are utilised effectively 3. Consideration to resurrect 'Future Leaders Programme'	Director of HR, Customer Services and Public Affairs
3	Human Resources	Ineffective pre-employment checks including for agency workers	Cause(s): - Poor procedures - Inadequate monitoring - Lack of awareness / understanding Effect(s): - Workers with safeguarding concerns not identified - Safeguarding incident occurs (harm / injury) - Agency worker ID fraud - Reputation damage - Legal compliance implications inc. fines and sanctions	Personnel / Operational	4	3	12	1. Matrix carry out pre-employment check for agency workers. 2. Managers check identity of candidate and of agency workers when arriving for work, with copy of DBS and proof of identity. E.g. passport, and original copy of birth certificate 3. Training provided for managers	4	1	4	- Ongoing consideration as to whether training should be mandatory	Director of HR, Customer Services and Public Affairs
4	Human Resources	Management of the ongoing transitional and transformational changes (commissioning process, baseline exercise and service redesigns and alternative delivery options)	Cause(s): - Lack of adequate financial resources - Lack of expertise - Unexpected delays - Changes in strategic direction - Lack of capacity to undertake in a timely manner - Conflicting priorities Effect(s): - New service models are ineffective / not fit for purpose - Increased costs - Legislative and legal requirements breached (e.g. TUPE) - Reduction in service quality / provision - Reputation damage	Personnel / Operational	4	3	12	1. Managing change procedure in place 2. Capacity building and additional resources to support the change process 3. Effective communication and engagement with staff and their representatives 4. Formal consultation processes and departmental representatives 5. Regularly meetings include Members 6. Terms of Reference for each workstream led by Chief Officers	3	2	6	- One-off funding required to support transformation programmes and workstreams - Review HR Processes in light of new working arrangements	Director of HR, Customer Services and Public Affairs

Human Resources and Customer Services Risk Register - Appendix C

											DATE LAST REVIEWED:	30.12.2025	
REF	DIVISION	RISK TITLE & DESCRIPTION	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING			FURTHER ACTION REQUIRED	RISK OWNER
					LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
5	Human Resources	HR systems failures e.g. payroll, recruitment, HR self-service and pensions	<p>Cause(s):</p> <ul style="list-style-type: none">- Contractual failure- IT failure- Loss of power- Data breach / Cyber attack- Ineffective business continuity plan for manual work around <p>Effect(s):</p> <ul style="list-style-type: none">- Delays or restriction in level of HR support available- Staff not paid- Staff morale reduction if for a long period- Delays in ability to recruit- Failure to apply for jobs, employment/legal issues- Failure to comply with contractual obligations- Industrial action	Data and Information	2	5	10	<ul style="list-style-type: none">1. Back-up payroll processes/systems2. Regular saving of personnel information on Oracle3. Business Continuity Plan in place4. Regular meetings with contractors and Business Continuity Plans for each contract	4	2	8	None identified	Director of HR, Customer Services and Public Affairs
6	Human Resources/ Health and Safety	Staff not completing mandatory and/or required training	<p>Cause(s):</p> <ul style="list-style-type: none">- Lack of staff capacity to complete training- Lack of knowledge of mandatory courses- Lack of monitoring of who has completed the courses <p>Effect (s):</p> <ul style="list-style-type: none">- Potential accidents/fatalities if staff don't receive required training, which could mean potential prosecution of Council and / or civil claims for compensation- Potential data breaches- Lack of competency in workforce- Not meeting legal requirements- Inconsistencies in how work is undertaken	Personnel / Operational & Health and Safety	4	3	12	<ul style="list-style-type: none">1. Reporting on who has completed the Fire Prevention and Evacuation e-learning course regularly done2. Reminder emails regularly sent about completing mandatory courses3. Automatic reminders sent out to staff members by the Evolve system when staff members need to redo their fire prevention and evacuation e-learning course (it has to be done annually)4. H&S training and cyber security training completion rates included in reporting to committees such as CLT and the Corporate Health and Safety Committee5. COE have agreed which courses are mandatory.6. Organisational Development regularly send emails to staff on what training they need to complete	3	3	9		Director of HR, Customer Services and Public Affairs
7	Human Resources / Health & Safety	Failure to comply with statutory health and safety requirements and associated guidances and best practice guidance including lack of competence/capacity to fulfil our statutory duty of care to staff and other users of Council premises	<p>Cause(s):</p> <ul style="list-style-type: none">- Inadequate risk assessments- Outdated policies and processes- Poor use of data around incidents- Lack of capacity to discharge the Council's H&S responsibilities- Lack of clarity over the breakdown of responsibilities across the organisation- Ineffective monitoring of risks- Lack of competency across the workforce- No trained fire responsible person (legal) for some sites- Insufficient numbers of trained fire wardens and fire marshals onsite to safely manage an evacuation (in accordance with the Fire Risk Assessments).- Insufficient fire safety and fire fighting equipment- Property related issues- Insufficient fire and first aid arrangements including for outside of normal working hours- Insufficient arrangements to support those who may need additional assistance evacuating in a fire (including the lack of undertaking of personal emergency evacuation plans)- Fire risk assessments not undertaken- Insufficient fire evacuation arrangements for monitoring who is on site at any given time- Lack of clarity on who is responsible for what should there be an emergency- Lack of awareness with legislation- Failure to effectively consult staff where appropriate- Human error / lack of understanding- Lack of capacity and capability to deliver- Delays in requested first aider training being delivered <p>Effect (s):</p> <ul style="list-style-type: none">- Potential prosecution of Council and / or civil claims for compensation- Increased sickness/absence- Poor staff morale and reputation- Impact on staff retention- Insurance claims- Potential accidents/fatalities- Non compliance with the Regulatory Reform (Fire Safety) Order 2005, as amended by the Fire Safety Act 2021- Inadequate plans for fire safety and evacuation putting staff and visitors at risk site manslaughter- Non compliance with the Health and Safety (First Aid) Regulations 1981	Health & Safety	4	5	20	<ul style="list-style-type: none">1. Corporate Health and Safety Policy published. This outlines responsibilities for health and safety in the organisation, and the arrangements in place to ensure the safety and wellbeing of staff and others2. Health and safety policies reviewed and updated regularly - ongoing3. Commitment to health and safety from Chief Executive and Directors4. Health and safety training, including mandatory training, provided to staff and others.5. Corporate Health and Safety Committee and Departmental Safety Committees meet regularly6. Quarterly health and safety updates provided to Corporate Leadership Team (CLT) including information from enforcing bodies7. Risk assessments done locally and corporately8. Ongoing review of incident statistics to monitor for any trends that need to be addressed9. Informal H&S audits are being undertaken by Corporate Health and Safety, as well as site visits10. Work-related violence committee set up11. New personal protective equipment, first aid, driving and mobile phones and sexual safety policies published12. Fire evacuation instructions for the Civic Centre site communicated as part of site induction to all staff. The fire evacuation documents have also been published on the intranet13. All staff required to complete fire prevention and evacuation e-learning course14. COE have agreed that managers will be fire wardens. Training for managers took place in June and July 202515. Fire Safety is a standing item at Corporate Health and Safety Committee Meetings16. Fire Safety policy published17. Fire drills undertaken18. A report regarding fire risks of electric powered personal vehicles (EPPVs) created19. Minimum of two evacuation chairs placed on each floor of Civic Centre20. CLT updated on fire safety on a quarterly basis21. First aiders list displayed on notice boards across the Civic Centre site and on the intranet22. Twenty eight defibrillators recently purchased. These are to be placed across different Council sites including some parks and greenspaces23. First aid training recently undertaken. Further dates are currently being arranged24. Further recruitment of first aiders being undertaken25. Monthly allowance provided to first aiders to encourage more people to volunteer26. New first aid policy recently published	3	4	12	<ul style="list-style-type: none">- Continuation of risk assessing & proactive monitoring- Continue to revise policies which need to be updated including electrical safety, lone working and legionella management- Review the current incident reporting system in place, and see if an alternative can be implemented- Ensure staff do health and safety training. To aid this, continue to deliver webinars to staff members on different health and safety topics- Learning and Development to arrange fire safety training on an ongoing basis- Arrangements to allow for roll calls to be undertaken to be considered- Facilities Management to ensure Fire Risk Assessments are completed- Facilities Management to engage fire safety supplier to produce emergency plans for all LBB sites- Facilities Management team to distribute emergency plans to site occupiers and to arrange training on plans for fire marshals	Director of HR, Customer Services and Public Affairs
8	Customer Services	Fall in income from Registrars Economic downturn and change of civic accomodation contributing to a fall in income in Registration Services e.g.loss of The Ceremony Room as a venue option	<p>Cause(s):</p> <p>Change of venue</p> <p>Effect(s):</p> <p>Reduced level of bookings Financial impact</p>	Financial - Operational	3	3	9	<ul style="list-style-type: none">- Regular budget and activity monitoring- Targeted marketing of ceremonies, venues etc. to maximise income, website videos, use of social media- Flexible use of casual staff to maximise income in periods of high activity and reduce costs in quieter periods- Promotion of non-statutory ceremonies to cover income targets	2	2	4	Development of web based & Reception displays advertising for suppliers such as florists, photographers, funeral directors etc.	Assistant Director of Customer Services

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9	Customer Services	Contractor Failure	Cause(s): Contractor (such as Liberata) cease trading due to financial or other failure. Effect(s): Interruption to or deterioration of service due to failure of contractors (out of hours security guards at Civic Centre, for example)	Contractual and Partnership - Operational	2	4	8	- Regular monitoring of performance and monthly operational meetings to identify any continued and ongoing reduction in service delivery - Core contract monitoring and overview of other elements of the contract to identify shortfalls in other areas of service delivery - Effective scrutiny of potential contractors - Appropriate performance bonds or parent company guarantees - Business continuity planning - Standardised contract letting procedures and documentation as contracts renew	2	3	6		Assistant Director of Customer Services
10	Customer Services	Contractor Performance	Cause(s): Failure to effectively manage service delivery contracts provided such as Liberata Effect(s): Continued and ongoing poor performance and/or increased customer complaints.	Contractual and Partnership - Operational	4	3	12	- Daily, weekly, monthly and annual monitoring of performance and key performance indicators - Monthly operational meetings with contractor to discuss performance and monitor against balanced score card - Escalation through core contract route of any continued and ongoing shortfalls in performance	2	2	4		Assistant Director of Customer Services
11	Customer Services	Maintenance of Statutory and GRO standards	Cause(s): Increase in life events (births / deaths) within Bromley Staffing pressures Effect(s): Drop in standards leading to a potential breach of statutory duty and extended wait time to register	Legal - Operational	3	3	9	1. Regular monitoring of registration activity and timescales, close liaison with Medical Examiner and Bereavement/Maternity services 2. Use of casual staff to perform statutory registrations 3. Close monitoring of quality and performance from GRO system reporting 4. Regular internal and external audits conducted to ensure compliance, annual performance report provided to GRO in May	1	3	3		Assistant Director of Customer Services
12	Customer Services	Loss of Facility Loss of customer service accommodation as a result of a major power failure or other incident that prevents access to the Civic Centre	Cause(s): Major power failure or other incident that prevents access to the Civic Centre Effect(s): Major disruption to council services	Data and Information - Operational	3	3	9	Business Continuity Plan regularly reviewed - Existing local resilience procedures (overflow to alternative Liberata Office) establish in a temporary alternative location Considered as part of the overall corporate business continuity plan options for temporary accommodation	2	2	4		Assistant Director of Customer Services
13	Human Resources	Polygamous Working	Causes: 1. Employees can work multiple jobs without being physically present, making detection harder. 2. Financial Pressures. 3. Cost of living increases drive employees to seek extra income, sometimes without disclosure. 4. Secondary employment policies exist but lack annual declarations or proactive checks. 5. Remote systems allow employees to log in from anywhere. 6. Technology access e.g. two laptops, two employers, working both jobs at once undetected. 7. "Side hustles" and gig economy normalise multiple jobs, blurring boundaries between acceptable and fraudulent dual employment. Effects: 1. Fraud. 2. Breaches of contract. 3. Working Time Regulations violations. 4. Reputational damage. 5. Detrimental impact on quality of service delivery if staff are not meeting contractual requirements.	Personnel / Operational	4	4	16	- Register of officers interest (ROI) form completion - Spot checking - Liaising with other Councils and agencies - Quarterly payroll data matching with other London Boroughs via London Fraud Hub	3	3	9	Policy & Governance • Clear secondary employment policy with contractual clauses. • Mandatory annual declaration for all staff. • Explicit Working Time Regulations compliance checks. Technology & Data • Payroll anomaly detection • HMRC RTI and NFI data-matching. Manager Awareness and Performance Management • Training on spotting fatigue, performance dips, and conflicts of interest. • Escalation routes for suspected cases. Fraud Prevention • Include in Counter-Fraud Strategy/training. • Whistleblowing awareness.	Director of HR, Customer Services and Public Affairs
14	Human Resources	Ineffective compliance with IR35	Cause(s): - Inadequate information from managers, - Non submission of requests for HR scrutiny - Non submission of approval by relevant Chief Officers - Poor knowledge of what is required Effect(s): - Huge fine by IRS - Reputational damage - IRS investigation of the authority	Financial / Legal	3	5	15	1. Clear standards and expectations in line with the process 2. Dedicated HR Officer with updated knowledge of IR35 requirements 3. Access to external expert advice commissioned if required 4. HR monitoring	2	3	6	- Regular awareness sessions on IR35 for managers - 6-monthly compliance report to CLT/COE - Joint HR/audit review	Director of HR, Customer Services and Public Affairs

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Corporate Risk Register - Appendix D

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1	Corporate Risk	Failure to deliver a sustainable Financial Strategy which meets with Making Bromley Even Better priorities and failure of individual departments to meet budget	Cause(s): 1. The Draft Budget 2026/27 and Update on the Council's Financial Strategy report to Executive 2027/28 to 2028/29 being reported to Executive on 21st January 2026 identified the need to reduce the Council's future years 'budget gap'. 2. The outcome of the Government's review of the existing local government finance system (now known as Fair Funding 2.0) has resulted in real terms funding reductions of £10m in 2026/27 increasing to £30.5m per annum from 2028/29. The significant levels of cost/growth pressures relating to SEN, social care and homelessness continue and there remains uncertainty relating to future cost increases arising from service inflation for some time. These factors can have a significant impact on the future years' 'budget gap'. 3. Failure to meet departmental budgets due to increased demand on key services resulting in overspends: housing (homelessness and cost of bed and breakfast); adult social care (demographic changes including ageing population); children's social care, education (central costs, high needs transport and DSG deficit), waste (growing number of households), Dedicated Schools Grant deficit increases and limited delivery of planned mitigation savings. 4. New capital schemes may be required with the associated revenue impact (including financing) adding to the Council's 'budget gap' to meet. 5. Dependency on external grants to fund services (schools and housing benefits are ring-fenced) - effect if specific grants reduce or cease. 6. Increases in national living wage will have cost implications to the Council over the next few years (e.g. care providers and carers). 7. Local government may be required to take on new funding responsibilities in the future without adequate funding. 8. Ongoing risk of inflation exceeding Bank of England inflation target levels. 9. Failure to identify and highlight frauds and weaknesses in the system of internal control (which invariably have a financial impact). Overall, identified fraud losses are mainly benefit related (Council Tax Support / Single Person Discount). Effect(s): 1. Increased overspends in particular services 2. Council unable to carry out its statutory duties due to services cuts 3. Reputational damage 4. Risk of having to seek Exceptional Financial Support (EFS) or ultimately a Section 114 notice	Finance Financial	5	5	25	- Regular update to forward forecast - Regular analysis of funding changes and new burdens including full year impact - Transformation options considered early in the four year forward planning period - Budget monitoring to include action from relevant Director to address overspends including action to address any full year additional cost - Mitigation of future cost pressures including demographic changes - Quarterly review of growth pressures and mitigation - Growth Reduction Board chaired by Chief Executive	4	5	20	'The Council continues to explore transformation opportunities to help meet the ongoing budget gap. Chief Officers will explore further measures to help reduce the overspend in 2025/26 as reported to Executive in September.	Director of Finance
4	Corporate Risk	Ineffective governance and management of contracts and procurement	Cause(s): 1. Lack of awareness and/or non-compliance with Procurement Act 2023, Public Contracts Regulations 2015, Provider Selection Regime and Councils Contract Procedure Rules. 2. Lack of awareness and/or non-compliance with decision making and scrutiny requirements. 3. Insufficient engagement with key support services such as Corporate Procurement, Finance and Legal. 4. Poor planning / lack of timely action for commissioning and procurement activities. 5. Poor record keeping of contracts and contract documentation. 6. Insufficient or unclear arrangements for client side contract management and monitoring resource. 7. Failure to undertake a suitable and proportionate contract management and monitoring plan. 8. Failure of a contractor / partner / provider to maintain agreed service levels resulting in an interruption to or deterioration of service delivery. Effect(s): - Failure to ensure Value for Money - Procurement challenges / complaints leading to delays and potential additional costs - Reputational risk - Service disruptions - Contracts do not deliver expected outcomes or deliver sufficient quality - Increased cost and resource to manage contract issues - Failure to achieve our Making Bromley Even Better priorities.	Contract Management Contractual and Partnership	3	4	12	- Gateway process to support and record all relevant procurement decisions - Contract Procedure Rules and regular Practice / Guidance notes to all Contract Owners - Review of contract management and contract monitoring controls including any issues identified by internal audit - Contracts Database and Quarterly Contracts Database Report to all relevant Committees - Quarterly RAG rated contract reports to COE/CLT with individual reports to Contract Owners - Procurement Board oversight - Member scrutiny including regular Contract Monitoring Reports for £500k+ contracts - Regular programme of training delivery to staff - Quarterly Contract Owners meetings	2	4	8	- Procurement Pipeline to support forward planning and to meet new statutory requirements. Bi-annual. First publication by Summer 2025 (COMPLETED). - Completion of Procurement Act 2023 national L&D programme by October 2024 for all Procurement and Legal Contracts officers (COMPLETED). Training offered to all Contract Owners (COMPLETED). - Review of all documentation to ensure compliance with Procurement Act 2023. New documentation in place and constant review based on lessons learned and further guidance received (COMPLETED). - Update and adoption of revised Contract Procedure Rules. In progress with finalisation expected in Summer 2025 (COMPLETED). - Review and updating of Contract Management library, tools, resources and processes. In progress with completion in 2026 - Regular review of Third Party Spend, identification of any strategic procurement and process issues and follow up for remedial action and key messaging. In progress with completion in 2026. - ongoing and repeated high profile key messaging across the Council and monitoring of compliance	Service Directors supported by Assistant Director, Governance and Contracts
5	Corporate Risk	Failure to maintain and develop ICT information systems to reliably support departmental service delivery	Cause(s): 1. Some information systems not fully fit for future business purpose 2. Insufficient capacity and skill within Corporate IT and services to maintain and support systems during a period of significant change and in the future, including for individual systems 3. Increasing reliance on stability of ICT infrastructure in all areas of the Council (Lync telephony service). 4. Council website now a major channel for the delivery of services (Pay for it, Apply for it, Report it). - (Phase 2 upgrade of website planned) 6. IT failure impacting on critical operational systems. 7. Over the next 3 years we will need to undertake gateway reviews / procurement plans for Council's business critical systems for example, Uniform, Housing info system and Education's Capita One system plus the main LBB website 8. Transfer of IT contract to a provider following procurement process 9. Potential risk in transferring from one site to another if there is lack of adequate support and sufficient timeframe Effect(s): 1. Service disruptions 2. Inability to access key systems 3. Reputational damage 4. Inability to support organisation change and savings targets 5. Failure to achieve our MBEB priorities.	ICT Data and Information Technological	3	4	12	Robust backup arrangements in the new accommodation Enhanced antivirus/cyber security. tested system restoration arrangements. Cloud migration project New contract Accommodation better equipped to support resilience	2	4	8	Review data storage /hosting arrangements. Completion of cloud migration, office accommodation, contract procurement and award	Director of Corporate Services supported by AD IT
6	Corporate Risk	IT Security Failure	Cause(s): Failure of IT Security (responsibility across Bromley & BT) to manage risk of attack or intrusion leading to potential corruption / loss of data / loss of systems Failure of System manager where Digital & IT service (including BT) do not manage the system Failure to comply with relevant legislation (GDPR) Failure to ensure the confidentiality, integrity, and availability of information assets. Failure of officer action where human error/non-compliance with policy and best practice leads to compromise Effect(s): 1. Distress and/or physical impact on wellbeing of customers 2. Impact on operational integrity 3. Reputational damage to services and the authority as a whole 4. Liability in law 5. Economic damage to authority and/or customers 6. Impact on service take up due to reduced confidence from the public	ICT Data and Information Technological	4	5	20	-Application of effective security management including effective application of anti- virus protection and security measures through the IT Contract with BT - Regular Penetration Testing undertaken - Information Security Team in place - Patch updates undertaken regularly - LBB is currently compliant with the Public Services Network Code of Connection (PSN CoCo), DSP Toolkit and PCI-DSS (Payment Card Industry standards) The LBB Corporate Leadership Team formally accept the above certifications as the basis of LBB's internal information governance and security program. These standards are based on the ISO27001 international best practice and NCSC guidance for managing information security and are therefore fit for purpose for assessing and managing the Council's information risk - Information Security & Data Protection Training programme in place - Induction programme in place - Security Operation Centre(SOC) has been implemented which proactively monitor of the LBB Data and Infrastructure. - CAF (Cyber assessment framework) through Local Digital (MHCLG) in progress to mature cyber resilience - Data protection and securityimpact assessments in place for changes to processing activities	3	5	15	Cyber Assessment Framework Stage 2 completion for assessment - April 2026 Maturing of Cyber incident response playbooks Undertake table top exercise to test cyber resilience plans Mature Joiners, Movers, leavers process Funding has been awarded by MHCLG to improve cyber resilience, a plan is to be detailed on how to use the funding effectively	Service Directors supported by Assistant Director, IT

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7	Corporate Risk	Failure to maintain robust Business Continuity and Emergency Planning arrangements	<p>Cause(s):</p> <ol style="list-style-type: none">Insufficient Emergency Planning structure and processesInsufficient Business Continuity arrangements and procedures, including those of key suppliersFailure to fulfil obligations under the Civil Contingencies Act 2004 as a Category One ResponderInadequate partnership working and collaborationLack of buy in from senior officersLack of testing and exercising of plans and processes <p>Effect(s):</p> <ol style="list-style-type: none">Ineffective response to an emergency / business disruptionSignificantly prolonged service disruptionsReputational damage / loss of credibilityIncreased costs to rectify disruptionsInjury / harmFailure to fulfil statutory duties in a timely manner	Business Continuity Physical Reputational	3	4	12	<ul style="list-style-type: none">- Corporate business continuity management programme established- Full suite of Business Continuity plans in place at service level across all Directorates- Overarching Corporate Business Continuity plan developed identifying prioritisation of all services- Corporate Major Emergency Response plan in place- On call rota for Emergency Response Manager and at Director level- Ongoing training, testing and exercising programme- Continued delivery of the Business Continuity Management Process by CLT	3	3	9	<ol style="list-style-type: none">1. Learning from corporate testing and exercising programme embedded into review of service BCP plans taking place between May and September 242. Development of this year's corporate testing and exercising programme to further embed BC practices across the organisation will take place in December 24 to February 25.	Director of Environment and Public Protection	
8	Corporate Risk	Failure to deliver effective Children's services The Council is unable to deliver an effective children's service to fulfil its statutory obligations in safeguarding and protect those at risk of significant harm or death, sexual exploitation or missing from care	<p>Cause(s):</p> <ol style="list-style-type: none">Inability to recruit and retain sufficient numbers of staff to carry out statutory duties across the division to manage current levels of demand.Budget pressures result in challenges to fulfilling statutory obligations. <p>Effect(s):</p> <ol style="list-style-type: none">Impact on life chances and outcomes for children.Adverse inspection leading to reputational damage and further operational difficulties (staff leave etc).	Children's Social Care Legal, Reputational	3	5	15	<ul style="list-style-type: none">- Multi Agency Bromley Children's Safeguarding Partnership (BCSP) Training programme 2023/24 has been agreed.- Regular Budget monitoring sessions including Director of Finance and Assistant Director of Finance to monitor spend and projected costs.- Dedicated HR programme of support in place to recruit social workers to front line posts. We have recently reviewed social media publicity/"Refer a Friend" scheme to ensure we have a broad and comprehensive approach. We are also currently actively recruiting from overseas.- Scrutiny of Performance Management Framework and Indicators.- Effective procurement framework and contract monitoring arrangements to ensure acceptable quality of service provision and value for money.- Quality Assurance Audit Programme continues to be in place. We have also added "Dip Sampling" of cases to the ways in which we are auditing quality of practice.- Children's Service Practice Improvement Board; this meeting continues to be the key forum for discussing and evaluating the quality of practice.- Continued monitoring of caseloads to keep these in line with the Bromley Caseload Promise.- Identified training plan for qualified social workers and other professionals reviewed and updated quarterly.	2	5	10	<ul style="list-style-type: none">- Robust audit cycle in place. Demand Management forecasts informing MTFS	Director of Children's Services	
9	Corporate Risk	Temporary Accommodation Inability to effectively manage the volume of people presenting themselves as homeless and the additional pressures placed on the homeless budgets. Rising cost of placements.	<p>Cause(s):</p> <ol style="list-style-type: none">Continued subsidy freeze on TA subsidy ratesRising numbers of placements (approx. 15 per month)Further reductions to local affordable sustainable optionsRising energy and other costs mean households are facing increasing risk of homelessnessUncertainty around the impact of move on requirements for schemes such as Homes for Ukraine, Afghanistan resettlement programmeWithdrawal of number of private landlords and housing providers from the TA market.Market reaction to interest rates, response to inflation rates, and proposed changes to legislation leading to reduction in supply.Reaction to supply and demand leading to increased costsIncreased pressure securing accommodation as a result of competition from others <p>Effect(s):</p> <ol style="list-style-type: none">Failure to fulfil statutory obligationsImpact on life chances and outcomes for individuals and families in temporary accommodationIncreased risk of legal challenge due to accommodation and increased risk of Out of Borough PlacementsIncreased risk of legal challenge due to provision of accommodation (including shared accommodation and commercial hotels)Pressure on other servicesIncrease in the number of out of borough placementsIncreased length of stay in TA due to less move on opportunitiesCosts cannot be contained within budget	Housing Social	5	5	25	<ul style="list-style-type: none">- Focus on preventing homelessness and diversion to alternative housing options through:-- Landlord and Tenancy advice, support and sustainment- Assistance, (including financial aid) to access the private rented sector- Access to employment and training- Debt, money, budgeting and welfare benefits advice, including assistance to resolve rent and mortgage arrears- Sanctuary scheme for the protection of victims of domestic violence- Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money- Development of social housing on LBB sites and implementation of Meadowship Homes acquisition- Implementing the Homelessness Strategy - setting up the multi agency Homelessness forum and taking forward the priorities of the strategy- New incentive campaign for private sector landlords embedded and benefits being realised	5	4	20	<ul style="list-style-type: none">- Phase 2 of meadowship homes property acquisition now live. Approval to progress with a further 3 housing sites under the LBB affordable housing delivery programme- ongoing conversion of tenancies in the More Homes Bromley scheme from temporary to permanent- Review requirement for block bookings to ensure sufficient TA supply- Progress counter fraud work on TA properties and explore joint fraud working with social landlords to ensure properties are occupied by intended clients.- Pursue additional grant funding to increase affordable housing supply through development acquisition and empty homes- Explore whether, when accommodation is lost, the Council can take on these properties instead- Undertake a review of arrangements with Housing Association partners to look at potential to increase number of nominations and make best use of existing housing stock	Director of Housing, Planning and Regeneration	
11	Corporate Risk	Failure to deliver the Transforming Bromley Programme	<p>Cause(s):</p> <ol style="list-style-type: none">Failure to identify and put forward sufficient transformation proposals required to deliver a balanced budget in the Medium Term Financial StrategyFailure to deliver appropriate mitigation of existing projected growth pressures within the financial forecastFailure to appropriately resource each Transforming Bromley workstream with sufficient project support and subject matter expertise to enable the identification of proposalsInsufficient management oversight and governance arrangements to shape the delivery of proposals to enable Member decision making and inform budget setting for each financial yearInsufficient consultation and engagement with relevant stakeholders to ensure the successful delivery of proposals.Additional demand pressures on council services. <p>Effect(s)</p> <ul style="list-style-type: none">- Inability to address the Council's budget gap.- Unable to meet key commitments of the Medium Term Financial Strategy	Finance Financial	4	5	20	<ol style="list-style-type: none">1. Robust governance process: fortnightly meetings of the Transformation Board, chaired by the Chief Executive and attended by Chief Officers2. Each Transformation Board workstream attends the Transformation Board before proposals are reviewed by Cabinet/Directors, PDS Committees and the Executive.3. Each Transformation workstream has appropriate resources to successfully deliver proposals4. Monthly Transformation newsletter in place to appropriately engage with key stakeholders5. Where transformation proposals have public law implications, an appropriate assessment is carried out and stakeholders are engaged, including Procurement and Legal Services.6. Each Chief Officer gives an update at their respective PDS Committee(s) on Transformation progress7. Transformation Fund supports the successful delivery of transformation proposals subject to a suitable business case being provided8. A review of core statutory minimum service requirements took place to enable each service area to identify where potential savings could be and to evidence that where discretionary services are delivered. They are done so on a cost-recovery basis and/or they reduce long-term dependency on higher levels of statutory intervention which generate longer term growth pressures for the Council9. All relevant proposals will be submitted to the Executive to inform budget setting for MTFS.10. Finance provide assurances through budget monitoring to ensure that agreed mitigation and transformation programmes are on track to deliver the savings identified. Where Directors declare a deviation from the plan, alternative proposals are sought for approval.	3	5	15	<p>A new Transformation Plan for 2024-28 was launched in April 2024, with staff engagement.</p> <p>Proposals being developed for key decisions and scrutiny as necessary between October – December 2024. Options under the wide umbrella of 'Transforming Bromley' include improving productivity, modernisation, reducing waste, taking a graduated approach to service thresholds leading to a reduction in statutory demand, using data to review and redesign in-house and commissioned services and service reductions. Staff continue to be briefed on the programme and engaged to ensure that they are able to influence the change programme with their experiences.</p> <p>If growth/cost pressures continue, decisions associated to the Transformation Programme are likely to have an impact on the delivery of services to our residents and service users.</p>	Chief Executive	

Corporate Risk Register - Appendix D

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13	Corporate Risk	Climate Change Failure to adapt the borough and Council services to our changing climate	Cause(s) Severe weather events including extreme heat, storms, floods etc Effects Resulting in threats to service service provision, environmental quality and residents' health in addition to reputational damage caused by perceived lack of action to tackle climate change	Service Delivery	3	4	12	- 1. Adopt best adaptation practice as identified through the London Councils Climate Programme - Implementation Plan for 2023 to 2025, identifying, mitigating and managing climate risks creating a green and resilient borough. 2. Implementation of LBB's Carbon Management Programme 3. LBB Surface Water Management Plan and Draft Local Flood Risk Strategy 4. Establish net zero (direct) carbon emissions target for 2027 as part of 10 year climate plan 5. Climate Change included within Corporate Risk Register and risks associated with climate change e.g. increased number of extreme weather events, included within Contract Risk Registers. Note the findings of the Independent Assessment of UK Climate Risk published on a 5 cycle.	2	4	8	1. Emergency Planning to liaise with Public Health on cross-cutting issues e.g. excess summer deaths and vector-borne disease etc. 2. Detailed climate action plan developed as part of ongoing Carbon Management Programme, in order to achieve net zero organisational carbon emissions by 2027. 3. Public signposting document to be developed early in 2023/24 to support homeowners and businesses to reduce their emissions.	Director of Environment and Public Protection			
14	Corporate Risk	Health & Safety (Fire and First Aid) Non compliance with legislation	Cause(s) 1. No trained fire responsible person (legal) for some sites 2. Insufficient numbers of trained fire wardens working from the site to safely manage an evacuation (in accordance with the Fire Risk Assessments) 3. Insufficient fire safety and fire fighting equipment and insufficient first aid supplies 4. Property related issues 5. Insufficient numbers of trained first aiders working from site to ensure sufficient first aid cover 6. Insufficient arrangements for monitoring who is onsite at any given time 7. Fire risk assessments not undertaken 8. Personal emergency evacuation plans not in place Effect(s) - Non compliance with legislation which could lead to legal and financial consequences - Inadequate plans for fire safety and evacuation - Non compliance with Health and Safety (First Aid) Regulations 1981 in terms of adequate first aid provision in the form of trained first aiders and appropriate equipment if employees are injured or become ill at work	Legislative Reputational Legal Physical Personnel	4	5	20	- Reduced number of staff on site - All staff required to complete fire prevention and evacuation e-learning course - COE has agreed that managers will be fire wardens. Training for managers undertaken in June and July 2025 - To encourage people to become first aiders, the monthly allowance that volunteers receive was increased - Fire Safety is a standing item at Corporate Health and Safety Committee, and is discussed quarterly at CLT - Fire Safety policy published - Arrangements for new accommodation implemented and are under constant review - New first aid policy published	3	4	12	1. Learning and Development to arrange training on an ongoing basis. 2. Facilities Management to ensure Fire Risk Assessments are completed. 3. Facilities Management to engage fire safety supplier to produce Emergency Plans for LBB sites. 4. Fire safety documents to be stored corporately to retain corporate knowledge. 5. Arranagments for roll calls to be considered.	Director of Housing, Planning and Regeneration Director of Human Resources, Customer Services and Public Affairs			
16	Corporate Risk	Capital Financing Shortfall Risk of significant costs increase in the Capital Programme and possible reductions in proceeds from disposals could impact on the Council's ability to fully fund the Capital programme	Cause(s): 1. Property price reductions as a result of the economic environment could have a negative impact on sale proceeds. 2. Limited scope to identify further Council assets for disposal 3. Significant increase in cost of capital schemes due to inflation and supply issues requiring an increase in funding 4. Significant additional costs and future liabilities across the Council's operational estate arising from any further condition survey liabilities not identified at this stage. 5. Requirement to obtain funding for significant new Housing Schemes and impact of higher borrowing costs 6. In February 2025, a report titled Capital Strategy 2025-26 to 2028-29 and Q3 Capital Programme Monitoring to Executive identified a significant increase in the Council's capital programme and resulting funding proposals given the factors identified above there is a risk that significant changes in cost and proceeds could create a new capital financing shortfall that needs to be addressed. 7. Only limited earmarked reserves available to support the capital programme, once other pressures (inc revenue budget gap) are factored in. Effect(s): Without alternative funding, the Council would require drawdown from revenue resources. This would increase the Council's revenue budget gap and/or further deplete earmarked reserves. 2. Increased use of external borrowing would add interest cost pressure to the Council's revenue budget along with Minimum Revenue Provision requirements for repayment of borrowing 3. Schemes would not be able to progress due to lack of funding available although the scope to do this may be limited given the critical nature of some of the works required 4. Potential requirement to sell operational or income generating investment properties to fund capital costs	Economic - Strategy	4	4	16	1. Fundamental review of capital programme undertaken to inform updated Capital Strategy 2023/24 to 2026/27 as reported to Executive in January 2023 - this includes full capital programme, approved asset disposals, mitigations and agreed financing options. 2. Regular reporting to Members via SAG, FSG and Executive 3. Tight control and scrutiny (by finance) of capital spending commitments as they reach the level of business case. 4. Quarterly reports on capital receipts (actual and forecast) to Executive. 5. Members have approved PW/LB borrowing to refinance existing housing schemes (£50m via PW/LB) and up to £10m support from the Council's earmarked revenue reserves. Subsequent schemes (mainly housing) have increased borrowing to around £159m	3	4	12		Director of Finance			
17	Corporate Risk	Operational Property Repair The OPR Programme cannot be delivered to budget and within programme	Cause(s): 1. That building cost inflation and other economic uncertainties continue 2. The scope of works required exceeds the budget 3. The programme continues beyond the time anticipated 4. Resource to deliver the programme not available as anticipated Effect(s): 1. Not all works required can be implemented 2. Impacted properties may continue to have repair liabilities beyond those anticipated 3. Impacted properties may not be compliant for building regulations and health & safety 4. Works continue beyond the end of the anticipated programme		5	4	20	- Surveys undertaken across the portfolio, - Cost estimates undertaken utilising average cost per m ² . - Executive Report on findings of the review and proposed capital works to refurbish the properties agreed at Full Council in Dec '22 - Ensure alternative and adequate resources are available	4	3	12	Monitor costs at Programme Board	Director of Housing, Planning and Regeneration			

Corporate Risk Register - Appendix D

												DATE COMPLETED:	Jan-26
REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press shift & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			FURTHER ACTION REQUIRED	RISK OWNER
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18	Corporate Risk	Operational Property Repair Buildings within the OPR Programme fail prior to commencement of works	Cause(s): 1. Infrastructure that is beyond economic repair fails Effect: 1. The property cannot be occupied 2. A Council service or stakeholder is unable to continue to offer a service from the property 3. There is a health & safety incident 5. The Council suffers financial and/or reputational loss		5	4	20	Works on properties known to be at risk are being accelerated	4	3	12	Monitor Facilities Management reports of infrastructure failure	Director of Housing, Planning and Regeneration
19	Corporate Risk	Recruitment and Retention Ineffective recruitment and retention strategies for hard to fill posts Recruitment freeze applies to most roles, but exemptions for hard-to-fill/high-risk posts (e.g., Qualified Social Work, Senior Leadership) are in place. This context increases reliance on robust recruitment and retention strategies for these roles.	Cause(s): 1. Physical environment/hygiene facilities 2. Culture 3. Increasingly fluid market 4. Increases in demand and/or reductions in supply 5. Lack of experienced staff in the labour pool 6. Budget constraints 7. Lack of leadership 8. Failure to compete with other organisations to recruit the highest quality candidates to build an agile work force 9. Cost of living rises deter potential candidates from working in London 10. Recruitment can fluctuate due to external pressures 11. Limited flexibility due to recruitment freeze for most roles, increasing reliance on exemption process for critical posts 12. Potential delays or complexity in exemption approvals Effect(s): 1. Potential service delivery impacts 2. Increased costs due to use of agency workers 3. Reduction in quality of service 4. Risk of slower recruitment even for exempt roles if exemption process is inefficient 5. Retention pressure heightened by restricted external hiring 6. Possible service gaps if exemption process fails or is delayed	Personnel / Operational	3	4	12	1. Horizon scanning to anticipate changes and trends to staff complement 2. Keeping up to date on national trends for hard to recruit professions 3. Case load review 4. Review of pay and comparison with neighbouring LAs 5. R&R Board to regularly review 6. No Quit Policy in place 7. Implement grow your own initiatives e.g. senior practitioners progression pathway, training pathways for social workers, graduate trainees, apprentices 8. Overseas recruitment 9. Signed up to the London Pledge - all Councils have a memorandum or understanding to pay social workers same rate 10. LBB staff present at recruitment fairs/events 11. Dedicated HR team to support managers in recruiting hard to fill positions in CSC and Education 12. Recruitment drive to convert locums to permanent staff 13. Exit interviews to understand why staff leave 14. Recruitment event took place in January 2023 15. Clear exemption process under recruitment freeze for hard-to-fill/high-risk posts, ensuring timely approvals. 16. Retention initiatives such as wellbeing programmes, flexible working options, and career development opportunities.	3	3	9	1. Review of retention strategies 2. Development of a Talent Management Strategy. 3. Consideration to resurrect 'Future Leaders Programme' Monitor exemption process effectiveness during recruitment freeze Ensure timely approvals for critical posts under exemption policy Strengthen retention initiatives (career pathways, wellbeing support, flexible working) Review talent pipeline strategies (graduate schemes, apprenticeships, overseas recruitment) Regular reporting to R&R Board on recruitment and retention performance for exempt posts	Director of HR, Customer Services and Public Affairs
21	Corporate Risk	Deleterious Materials - Discovery of Deleterious Materials in the construction and fit out of properties owned or occupied by the Council.	Causes: Use of deleterious material in building construction and fit out that are harmful to human health. Use of deleterious material in building construction and fit out which cause of long-term failure in building fabric and/or structure. Effects: Release of substances harmful to human health resulting in.... short- and long-term harm to employees, members, visitors and general public Failure of building structure resulting in....acute harm to employees, members, visitors and general public Closure or partial closure of buildings leading to temporary relocation and impact on Service delivery. Non-co-operation of tenants leading to Council having to result to dispute resolution to access building. Possibility of compensation if lease has such a clause. Investigation by the HSE leading to possible prosecution.	Health & safety	3	4	12	Council is complying with existing HSE and industry guidance including Health and Safety at Work regulations. Specification of all works to properties commissioned by the Property and Regen Teams ban the use of deleterious materials. Property and Regen to ensure Asbestos Management Surveys in place across the Councils' property portfolio. RAAC surveys commissioned by Property and Regen to cover the Councils' property portfolio.	3	3	9	Continued training on deleterious materials for property and regen staff (asbestos awareness etc). Council to hold a register of all identified deleterious material across the estate with mitigation plans were identified. Following the announcement of HSE asbestos management inspections of Councils, an external retained health and safety consultant will be reviewing the asbestos management arrangements in LBB.	Director of Housing, Planning and Regeneration
22	Corporate Risk	Polygamous Working	Causes: 1. Employees can work multiple jobs without being physically present, making detection harder. 2. Financial Pressures. 3. Cost of living increases drive employees to seek extra income, sometimes without disclosure. 4. Secondary employment policies exist but lack annual declarations or proactive checks. 5. Remote systems allow employees to log in from anywhere. 6. Technology access e.g. two laptops, two employers, working both jobs at once undetected. 7. "Side hustles" and gig economy normalise multiple jobs, blurring boundaries between acceptable and fraudulent dual employment. Effects: 1. Fraud. 2. Breaches of contract. 3. Working Time Regulations violations. 4. Reputational damage. 5. Detrimental impact on quality of service delivery if staff are not meeting contractual requirements	Personnel / Operational	4	4	16	- Register of officers interest (ROI) form completion - Spot checking - Liaising with other Councils and agencies - Quarterly payroll data matching with other London Boroughs via London Fraud Hub	3	3	9	Policy & Governance • Clear secondary employment policy with contractual clauses. • Mandatory annual declaration for all staff. • Explicit Working Time Regulations compliance checks. Technology & Data • Payroll anomaly detection • HMRC RTI and NFI data-matching. Manager Awareness and Performance Management • Training on spotting fatigue, performance dips, and conflicts of interest. • Escalation routes for suspected cases. Fraud Prevention • Include in Counter-Fraud Strategy/training. • Whistleblowing awareness.	Director of HR, Customer Services and Public Affairs
23	Corporate Risk	Provider Failure Failure on the part of commissioned providers to continue to deliver their contracted service	Cause(s): ' Provider unable to deliver their contracted service due to failure of the organisation to continue to operate eg financial failure, going into administration, handing back of contracts Effect(s): ' Potential end and/or gap in service provision to the Council and/or residents and local businesses ' Financial impact in putting in place interim arrangements and retendering - potential of having to recommission at higher cost	Legal / Financial / Reputational	4	4	16	Ensuring that financial and other key indicators relative to the health of organisations are reviewed and analysed during the tendering process of all contracts - Maintaining close relationships with all providers to understand current operating position that might indicate future failure - Monitoring contracts including ongoing financial position and lack of delivery on parts of service specification - Being prepared to respond rapidly on a cross-departmental basis to mitigate the impact of the failure on residents and institute any bridging actions prior to the appointment of another provider - Pursuing recovery of unused finances from the provider and/or withholding payments where permissible under contract - Maintaining communications with affected residents to keep them up to date on actions to mitigate the impact on individuals - Up to date business continuity plans and processes in each service to address issues at point of failure	3	4	12	Continuing monitoring of providers for early indications of potential failure - Sharing of intelligence with other councils using providers that are contracted by Bromley - Risk matrix assessment, classifying contracts by risk, particularly those where payments are made in advance or where providers hold monies on behalf of Council as High Risk - Documented contract management framework and checklists for higher risk contracts, based on risk matrix assessment - Minimum annual financial health check as part of the contract management checklist for all higher risk contracts - Open Book Accounting access included in all high risk contracts (commencing from 2026) with open book accounting review included in contract management framework	All Chief Officers for respective contracts

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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