

C5 - The Council fails to comply with the regulatory framework within which it must operate.					
Category:	Corporate Priority:		Risk Owner:	Portfolio Holder:	Tolerance:
Legal & Regulatory	Dacorum Delivers		James Deane		Treating
Inherent Probability	Inherent Impact	Inherent Risk Score	Residual Probability	Residual Impact	Residual Risk Score
4	4	16	3	2	6
Very Likely	Severe	Red	Likely	Medium	Amber
Consec	luences	Current	Controls	Assu	rance
regulatory frameworks which govern the way in which the Council must operate both on a day-to-day basis and in the discharging of one-off duties or actions. Generally, compliance with these frameworks is considered an operational risk and is monitored and managed through a combination of the Operational Risk Register and Performance Indicators which are reported to the relevant Overview and Scrutiny Committees. However, there is a risk that in some circumstances failure to comply with regulations could result in a number of consequences for the Council that are sufficiently negative and high profile in nature to become, for a short time, strategic in nature. For example, failure to follow the correct protocols prescribed under the data protection legislation could		by Officers who are experts frequently the subject of Int to provide Members with in	clarity in the way Council perate. ved and updated periodically in the field and are ernal Audit reviews in order dependent, third-party e likelihood of this risk ed in my reducing the Very Likely, to '2', Unlikely. ocedures ocedures ocedures	The Financial Regulations (M Emergency Plan were audite Internal Auditors in 2014/15 of assurance. The Risk Management frame Standing Orders were audite a SUBSTANTIAL level of assu Data Protection, Health and (Corporate Governance) and (Main Accounting) are in the review in 2015/16.	ed by Mazars, the Council's 5 and achieved a FULL level ework and Procurement ed in 2014/15 and achieved irance. Safety, the Constitution d the Financial Regulations

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esident . High profile negative publicity regarding the way the ouncil operates . Significant financial penalty imposed by the nformation Commissioner	Human Resources terms & conditions	
his risk has been included on the Strategic Risk Register o ensure that there is scope to escalate an operational sk for Cabinet consideration and Audit Committee crutiny should there be a period of intensified risk in a pecific regulatory area.		

Sign Off Complete

At the end of the last quarter, the Residual Probability of this risk crystallising was increased from 2 to 3 to reflect the ongoing investigation by the Health & Safety Executive into Hand Arm Vibration cases among machine operatives at Cupid Green Depot.

The investigation remains ongoing, but there have been no material developments that warrant an adjustment to the risk score this quarter. Members will be advised as and when new information becomes available.

C6 - The Council does not attract and retain the skill sets within its workforce that will enable it to maximise opportunities for delivering its services more efficiently through increased partnership working.

Category:	Corporate Priority:		Risk Owner:	Portfolio Holder:	Tolerance:
People/Employees	Dacorum Delivers		Robert Smyth		Treating
Inherent Probability	Inherent Impact	Inherent Risk Score	Residual Probability	Residual Impact	Residual Risk Score
4	4	16	2	4	8
Very Likely	Severe	Red	Unlikely	Severe	Amber

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Consequences	Current Controls	Assurance
 The quality of service delivery is likely to be adversely affected due to a lack of resources and/or skills to effectively deliver services through increased partnership working. There is likely to be a reduction in efficiency savings due to inability to create more effective partnerships. There is also likely to be a negative impact on any proposals for devolved powers. A failure to create more examples of effective partnership working will result in a higher likelihood of back office and front line services being reduced as the financial constraints on the Council's budget continue to tighten. 	 Leading in Dacorum continues to be delivered (all courses stated in risk register) People strategy to be implemented autumn 2016 which will cover issues including graduate scheme, apprenticeship scheme, succession planning, reviewing T&Cs etc. Continuation of sharing services with other LAs, with policy development and transactional/operational Hr activities The new approach for service planning for 2016/2017 focusses heavily on service innovation, service efficiencies and workforce planning. All leadership appointments are subject to behaviour tests which will assist with assessing their understanding and approach to partnership working. This control will reduce the risk as it will ensure that candidates who are appointed to leadership positions within the Council will have demonstrated that they display a positive approach to partnership working. 	 Across 2015/16 the Council had a voluntary annual turnover rate of 10.6% (76 staff). This compares positively to the public sector average (18%) and it is below the level within local government (11.9%). It is also lower than average for district councils (11%). Opportunities for collaboration and shared services are being actively considered across Hertfordshire in relation to Legal, HR, Information Management, Insurance and Payroll Services. Recruitment for leadership posts is generally competitive with a good number of applications being received from suitably qualified candidates for vacant posts.
	Sign Off and Comments	

Sign Off Complete

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We have continued to work hard to ensure that we attract and retain the right people in the right areas, and in doing so we have focused on two broad elements; recruitment and retention & development and training.

Recruitment and Retention:

We have a well-established approach to recruitment which includes training for managers, job adverts in modern media and up-to-date recruitment policies. We also work closely with services and specialist recruitment agencies to address any gaps or hard-to-fill vacancies.

We have increased the use of behaviour based assessments and personality profiles as part of the recruitment process to ensure that staff joining the organisation have the right values as well as having the right skills and experience.

Appraisals have been carried out for 2016/2017, as part of this process staff are set their performance objectives in line with service plans for the coming year. A staff survey has also been completed and we are working closely with staff analyse the results and to understand in what areas further improvement is needed.

Development and Training:

Our dedicated management training programme (Leading in Dacorum) continues to be delivered and our service planning model focuses on service innovation, service efficiencies and workforce planning.

Conclusion and Next Steps:

Given the controls in place, it is not necessary to increase the risk or likelihood of it crystallising. However the new People Strategy, which will be launched in autumn, will be central in setting out our long term vision and plan of action to provide the platform for future actions in relation to this strategic risk.



Category: Corporate	Corporate Priority: Dacorum Delivers		Risk Owner: Sally Marshall	Portfolio Holder:	Tolerance: Treating
Inherent Probability	Inherent Impact	Inherent Risk Score	Residual Probability	Residual Impact	Residual Risk Score
3 Likely	4 Severe	12 Red	2 Unlikely	3 High	6 Amber
Consec	quences	Current	Controls	Assı	irance
good quality data and information to determine sound decisions and plans, conduct operations and deliver services.include: • the Council' specialist • the custodiaIt is also required by the Data Protection Act and Government's Public Sector Network (PSN) Code of Connection (CoCo) to maintain confidentiality, integrity, availability and appropriately authorised use of the data.Information G ensuring that legislation in to compliance.With the Government's 'Open' agenda, increased flexible working patterns of staff, and increased partnership working and use of multiple information storage sources, controls on data management and security have become complex and important.To keep info changes to ter software systeConsequences of Risk – 1. Poor decision making due to ineffective use of or insufficient availability of data and information sharing.To manage strategies and development		 the Council's Corporate Integration Specialist the custodian, owner and Information Governance stratensuring that the Council collegislation in terms of ICT Secompliance. To ensure that the Council regarding ICT Security and Ir adhered to across all the Council role informed of relevation changes to technological, integration in relation 	formation Assurance updater of ICT Security and ategy, policy and procedure mplies with the latest ecurity standards and 's policies and procedures nformation governance are uncil's services. ant technical innovation and frastructure, telecom and to Information Security. wner of Information Security ecurity and Governance e Council in the future	 Information Security Offic Various ICT policies and pr Compulsory training for st PSN Compliance 	ocedures in place

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 sensitive data, DBC has the potential to be susceptible to cyber-attacks or sabotage. 3. Under performance. Breach of Data Protection Act leading to legal actions, fines, adverse publicity, and additional remedial and data protection costs. 4. Significant interruption of vital services leading to failure to meet duties and to protect people, finances 	 To train Council Staff, Members on Information Security, Data Protection Act and Freedom of Information Acts. Compulsory training for staff on Data Security PSN Compliance Audit of data protection approach 				
4. Significant interruption of vital services leading to failure to meet duties and to protect people, finances and assets.	- Audit of data protection approach				
5. Potential damage to DBC's reputation.					
	Sign Off and Comments				

Sign Off Complete

We continue to enjoy full PSN compliance which shows that that our processes and network & security controls meet the exacting requirements of the Cabinet Office. This includes a range of technical security measures including corporate firewalls, anti-virus software, end point security solutions and various authentication processes. However our PSN accreditation is up for renewal (in October) and we are currently working through the penetration testing process as part of new submission.

Every quarter we run training courses on data protection and information, governance and risk and we have recently updated the training guidance to require staff to attend a refresher course at least once every four years. There will be a new Act in 2018 – entitled the General Data Protection Regulations (GDPR) – which will bring about some changes to the way we process personal data. In light of this we will be revising our training to reflect the new law (which will be in force in May 2018).

Staff are also required to review, understand and sign a number of policies including ICT Acceptable Use Policy, Data Protection Policy and the Corporate Information Technology Security Policy. All suppliers working with our data are also required to complete an 'accreditation form' which assures us that they have robust data protection policies and controls in place.

Given the range of measures and controls we do not consider it necessary to change the ratings for this strategic risk.

F6 - Changes to legislation could negatively affect the medium to long term viability of the HRA Business Plan.					
Category:	Corporate Priority:	Risk Owner:	Portfolio Holder:	Tolerance:	
Financial	Affordable Housing	Mark Gaynor		Treating	



Inherent P	obability	Inherent Impact	Inherent Risk Score	Residual Probability	Residual Impact	Residual Risk Score
4		4	16	4	3	12
Very L	ikely	Severe	Red	Very Likely	High	Red
	Conseq	uences	Current	Controls	Assur	rance
on the self final legislative and impacted detri • The re-invigo sales from arou • The parallel i replacement so to build new he (leaving the ot • A change to r • 0.5% to CPI + target rents (le target) The governmen which, if enact the HRA Busing • A rent reduct complete inabili convergence to £30M over the lifetime of the • Enforced sale	ncing of the H policy change mentally on the ration of the H and 15-20 per introduction of theme where ones but only her 70% to be hational rent p 1% and endir aving 60% of at now propose ed, will furthe ess Plan viabilition of 1% per lity to make a o target rents first four yea HRA Business is of 'high value to fund House	IRA there have been major s which, overall, have he HRA Business Plan: RTB which has increased year to well over 100 f the RTB 'one for one' the Council can use receipts to pay for 30% of costs sourced) policy which moved from RPI ng the process of reaching DBC properties below se two further changes r constrain the capacity of ity: year for four years and a ny progress towards (a reduction of income of rs and over £500M over the	Elements of the changes are changes start from April 201 – proper business planning, project and programme man effective contract managem programmes and so on – ref and could provide sufficient business plan. The controls p changes – if the proposed le only mitigate the impact to a change, compounded with p significant. The controls are A complete review of the HF the impacts over activities a order to deliver the current will be focused on a slowing into current stock. Reducing the costs of runnin efficiency and service redesi tenants and leaseholders). Improved procurement of se existing contracts (though the within the last year or so and would include seeking share partners and models of oper	 and the current controls the disciplines of the MTFS, nagement arrangements, eent, annual efficiency flect on the existing position mitigation to the long term proposed for the new gislation is enacted – will an extent as the scale of previous changes, are so as follows: RA Business Plan to spread nd over time. Initially, in new build programme, this down of the investment Ing the service through gin (in partnership with ervices and renegotiation of nese have been procured d will restrict potential). This ed services with other 	A remodelling of the HRA Bu to take account of the impace be considered by Cabinet (in and periodically thereafter). the current new build progra The ability to extend this fur success of the mitigations ab	t of the changes which will itially in November 2015 This has demonstrated that amme can be completed. ther will depend on the

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and the assumption must be that it will happen. The consequences are very significant, and even with mitigation will continue to be so:

The financial viability of the HRA to meet its current business plan objectives in full cannot be made due to loss of income and economies of scale as stock numbers apply). diminish.

Services to tenants will have to reduce, including proposed investment in the existing stock, to deal with the scale of resource reduction.

The new build programme at its proposed scale will have to reduce, and possibly cease, in order to provide services to tenants and balance the books.

That resources provided through RTB one for one replacement will be unused and lost to the Borough as it the Borough and to increase supply of new homes. is returned to the Treasury as a result of the Council's inability to provide the 70% match funding and as Housing Associations reduce their supply of new affordable homes (as a result of the same legislative changes impacting on the Council).

The Council's housing stock will progressively reduce through RTB, enforced sales and reduction in new build which will reduce its ability to meet the housing needs in Ensuring that our intelligence on the changing position the Borough and achieving the strategic objective of increasing the supply of affordable homes.

overheads of the HRA.

Maximising the income to the HRA by altering use of parts of the stock (increased use of HRA stock for temporary accommodation and provision of low level care as part of a tenancy where rent controls do not

Altering the tenure mix of the current new build programme to include shared ownership and market sale in order to cross subsidise new rented provision. This could incorporate an element of affordable rent to increase revenue.

Development of a partnership approach to use of RTB one for one replacement funding with local Housing Associations in order to minimise losses of resource to

Fully exploring the potential of a Local Housing Company to improve the cost of delivery of new homes alongside the benefits to the General Fund.

Lobbying of government regarding the

disproportionately severe impacts of the changes, though historical reasons, on DBC seeking some local amelioration.

and on developments within the sector are fully up to date through membership of ARCH, liaison with CIH and other key bodies.

The following controls are in place already with regard to the financial and strategic management of the HRA **Business Plan:**

• An annual refresh of the HRA Business Plan reported



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	 both to CMT and to Cabinet Monthly meeting between budget holders and accountants monitoring progress against original timeframes and costs Regular meetings of the Corporate New Build Group considering performance and new schemes CMT receive a fortnightly update on the new build programme Performance Board comprising Chief Officers and cabinet members receive a report on progress before each cabinet meeting Reports on HRA performance go the Overview and Scrutiny every quarter The HRA is reported as part of the overall corporate financial reporting process 			
Sign Off and Comments				

Sign Off Complete

We are still awaiting the regulations which will give the detail to the new legislation. An update to the HRA Business Plan is planned for November 2016.

F7 - Funding and income is not sufficient to deliver the Council's corporate objectives					
Category: Corporate Priority: Risk Owner: Portfolio Holder: Tolerance:					
Financial	Dacorum Delivers		James Deane		Treating
Inherent Probability	Inherent Impact	Inherent Risk Score	Residual Probability	Residual Impact	Residual Risk Score
4 Very Likely	4 Severe	16 Red	3 Likely	3 High	9 Amber
Consequences		Current Controls		Assurance	
The government's austerity	programme has led to	The Council's Medium Term	Financial Strategy and the	There were three internal audit reviews undertaken by	

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reduced Local Authority funding over the last five years, resulting in the Council's need to find savings of £5m since 2010/11. Further funding reductions in excess of £3m are forecast over the next four years, which increase the risk of the Council being unable to deliver its vision for the borough, as detailed in the Corporate Plan.

(http://www.dacorum.gov.uk/docs/defaultsource/council-

democracy/dacorum corporateplan web.pdf?sfvrsn=2)

Sustained funding reductions of this magnitude are not only a risk to the Council's capacity to grow and enhance term, and optimise the balance between its financial the community, but more fundamentally they are a risk to the continued provision of high quality frontline services to residents.

If the Council is unable to deliver its vision or to protect its frontline service provision, it risks the following consequences:

Increased community hardship as the services provided to the most vulnerable residents in the borough are impacted, leading to delays in their accessing financial and residential help.

The impact of reducing standards of environmental services across the borough could lead to a less attractive environment and a loss of community identity and civic pride for residents.

HRA Business Plan are controls that mitigate the likelihood of this risk crystallising through the effective modelling of the future financial environment, which allows for more effective forward planning. These controls are detailed below, and have resulted in my reducing the inherent risk score from '4', Very Likely, to '3', 'Likely'.

The Council's Medium Term Financial Strategy (MTFS) details the financial implications of the Corporate Plan over a five-year period. It ensures that the Council is able to forecast likely income pressures in the mediumresources and the delivery of its priorities. The MTFS is reviewed at least annually and is approved by Full Council, thereby providing the opportunity for Members for delivering its corporate objectives. to make informed amendments to the Corporate Plan on the basis of likely funding constraints. The current version is accessible via the following link:

http://www.dacorum.gov.uk/docs/defaultsource/council-democracy/mtfs-july-cabinet-2015.pdf? sfvrsn=0

The Council's Housing Revenue Account (HRA) Business Plan maps planned income and expenditure over a thirty-year period. Government legislation that can affect the Council's delivery of social housing is incorporated within the plan and forms the basis for informed strategic decision-making.

Mazars during 2014/15, which provide an external view of the effectiveness of the controls implemented by the Council to manage the financial risks to delivering its priorities.

The audits on 'Efficiency Savings' and 'Main Accounting' received a Full level of assurance (the highest available), and the audit on 'Budgetary Control' received a Substantial level of assurance (the second highest available).

These internal audit opinions provide assurance that the Council is effectively controlling the processes that will enable it to derive value for money from its available resources, and therefore to maximise the opportunity

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Reputational damage as residents become dissatisfied with their experience of interacting with the Council. This risk is exacerbated by the growth of social media and the ability of residents to share their experiences with large numbers of people instantaneously.	The Council's reviewing of its Corporate Plan together with its Communications Strategy mitigate the impact of this risk, should it occur, by keeping residents informed of the pressures faced by the Council, and consequently by managing aspiration and expectation (detail below). On this basis, I have reduced the Impact score from '4', Severe, to '3', 'High.			
	The Council reviews its			
	Corporate Plan periodically to ensure that the vision for the borough remains relevant and realistic within the			
	financial constraints outlined within the MTFS and the			
	HRA plan. The aspirations of the Council and the community are managed through the Council's			
	Communications Strategy both through social media,			
	the local press and Digest.			
Sign Off and Comments				

Sign Off Complete

The position reported to the Audit Committee as part of the Strategic Risk Register last quarter was approved by Cabinet in July 2016 as part of the refreshed MTFS. There have been no further material changes to factors affecting this risk since that time. Work continues on the budget-setting process for 2017/18, part of which will include a refresh of the MTFS.

13 - The Borough does not secure sufficient investment in infrastructure to ensure that housing delivery and economic and community growth is sustainable in the longer term.

Category:	Corporate Priority:		Risk Owner:	Portfolio Holder:	Tolerance:
Infrastructure	Affordable Housing		Mark Gaynor		Treating
Inherent Probability	Inherent Impact	Inherent Risk Score	Residual Probability	Residual Impact	Residual Risk Score



4 Very Likely	4 Severe	16 Red	3 Likely	3 High	9 Amber
Consec	uences	Current	Controls	Assu	rance
The provision of infrastructul transport and other facilities the local community and ecc however, is increasingly com government moves away fro expects the development pri to deliver it. Failure to provid have a number of damaging A reduction in the quality of people in the Borough A serious constraint to econd impact on the contribution to Business Rates growth Increased community oppos particularly housing, on the infrastructure will not cope Damage to the image of the community pride and social damage to the Council	a is crucial to sustainability of ponomy. Its funding, aplex and difficult as central om direct provision and ocess and local partnerships de this infrastructure will consequences: Filfe and opportunities for omic growth with the o service provision through ition to new developments, grounds that existing area, worsening of cohesion and reputational	Infrastructure is provided th process (s106 and Communi elements of funding which c government (increasingly th HCC). The responsibility for s elements is through privatise or arms-length government Rail. The ability of the Counci is limited. The Council is able to promo timing of growth making it n infrastructure will be deliver promote partnerships and u influence to stimulate desire controls include: Ensuring that the Local Plan elements such as the Core Si supporting policies and so on out very clearly the requiren development. This promotes by design, access and mover masterplanning supports wh delivered to produce sustain The approved Council's Com Policy and schedule (CIL) pro contributions that must be n purpose for which they will b	ty Infrastructure Levy) and omes from central rough the LEP, bidding and some infrastructure ed arrangements (utilities) agencies such as Network cil to control these processes of the quantum, nature and nore likely that the red. It is also able to se its asset base and ed development. Current (and its component trategy, site allocations, n on) is up to date and sets nents of proposed is sustainable development ment, materials. Use of nat is required to be nability on larger sites. imunity Infrastructure Levy ovides for the levels of made by developers and the	The process for setting out of through the Annual Monitor process for CIL will see an ar income due, achieved and es infrastructure. Regular reports are made as	ing Report. The agreed nual report setting out xpenditure made on agreed

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an element of CIL which can be spent by local communities and act to link growth directly with infrastructure provision local people want. Operating a 'open for business' approach to how the Council deals with potential development with a presumption of making acceptable development easier to deliver by proactive advice through the planning process. Allied to this is ensuring that the development management service is capable of achieving decision making within required time limits. Stimulating required growth through the Council's own regeneration activity, including Hemel Evolution, Gade Zone and Heart of Maylands resulting in inward investment being more likely. Increasing inward investment through initiatives such as Dacorum Look no Further, Ambassadors, direct provision of business advice and a supportive approach to new development. Good market intelligence through regular liaison with local employers, landowners, developers, institutional investors and land agents regarding demand and expected assistance. Partnership with the LEP as the main route for additional funding for infrastructure through influencing the Strategic Growth Plan (in which Hemel Hempstead and the M1 corridor is a priority) and bidding for resources for infrastructure (such as the £5M achieved for West Herts College) Working to create key partnerships to bring forward development capable of funding major infrastructure

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 (such as Gorhambury) These controls are exercised within the following: Monthly reporting to Hemel Evolution Board and Corporate Regeneration Group Fortnightly reporting on key projects to CMT Reporting to Performance Board before each Cabinet Meeting A clear programme for the Local Development Framework and CIL Quarterly reporting to Overview and Scrutiny Regular reporting to Cabinet Adherence to the agreed performance and project management processes
Sign Off and Comments

Sign Off Complete

Progress continues in developing the Enterprise Zone with a view to April 2017 commencement. The government is currently reviewing the operation of CIL nationally. CIL contributions have started to come in but as yet at a very slow pace.

R5 - The Council does not embrace the increased use of social media as a tool for social engagement and increased community engagement.

Category:	Corporate Priority:		Risk Owner:	Portfolio Holder:	Tolerance:
Reputational	Dacorum Delivers		Sally Marshall		Treating
Inherent Probability	Inherent Impact	Inherent Risk Score	Residual Probability	Residual Impact Residual Risk Score	
3 Likely	3 High	9 Amber	2 Unlikely	3 High	6 Amber
Conse	quences	Current	Controls	Assurance	
The risk of not using social r	nedia	In order to mitigate these risks we have put in place a number of controls:		 o Corporate Information Security Management Policy o Corporate Information Technology Security Policy 	



 This will mean that our approach to engagement (i.e. letters, workshops, printed magazines) is likely to exclude key demographic groups including younger residents and those who are more technologically minded. We will not be able to respond to negative posts or views which could cause significant reputational damage or risk. 	The risk of not using social media - Our social media strategy sets out how we will proactively engage with residents through Twitter, Facebook, Linked In, Instagram and using online videos. - We have 18 social media accounts covering corporate and operational services including from the CSU.	 o Data Protection Act Policy o Freedom of Information Policy o PSN/Government Connect (GSx) Acceptable Usage Policy o Information Security Incident Procedure o Social Media Strategy o Facebook and Twitter accounts o Social Media Management System
 We will have less opportunity to influence Government and media through the use of targeted campaigns and communications. The organisation may not be viewed as 'technologically forward thinking' which could lead to reputational risks. This includes more difficulty in attracting hi-tech investment or exclusion from innovation pilots. Managing the risk of social media Members of the public can use DBC's profile to raise negative or incorrect statements that damage the reputation of DBC. Employees may breach data security rules regarding the management of private or confidential information. Inappropriate or unacceptable content posted by employees 	campaigns, events and messages.We interact with partners and other third parties (eg	



		messages.
	social media accounts are 'identity jacked' which	
occurs	s when fake accounts are set up to look like those	- We provide in-house training for all staff posting on
	•	DBC social media accounts.
incorre	ect or inappropriate information which is then	
associa	iated with DBC.	- We use a subscription service that manages and
		secures accounts.
- Weak	k authentication in the use of social media	
accour	nts can lead to them being hacked. The hacked	- All staff are required to read and sign-up to a range of
accour	nts are then used to post inappropriate,	policies including:
deroga	atory or libellous comments.	
		Corporate Information Security Management Policy
	use of social media can make it easier for 'pressure	Corporate Information Technology Security Policy
groups	s' to generate support behind negative campaigns.	Data Protection Act Policy
		Freedom of Information Policy
		PSN/Government Connect (GSx) Acceptable Usage
		Policy
		Information Security Incident Procedure
Sign Off and Comments		
Sign Of	ff Complete	

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During the reporting period we posted over 1,130 outbound messages, received over 233 direct messages and had a total twitter reach of 2.05 million viewers across our 18 social media accounts and networks. Some of the campaigns we have run include Clean and Tidy (Clean for the Queen), Dacorum's Den, Elections and Democracy (Referendum) and Hemel Evolution (Fountain and Water Gardens).

From a security perspective we have continued to manage our social media profile through a range of measures including our dedicated social media management system (Crowd Control) and through the enforcement and implementation of our social media and ICT policies. We also manage the risk of negative social media responses through our social media management system and by having a Communications Team rota which ensures we always have staff available to respond to any issues.

Social media is a key communication tool for us and the effective management of it is vital, but given the controls we do not consider that any changes need to be made to the risk or the likelihood of it occurring.