

Risk Register - CHIEF EXECUTIVE'S DEPARTMENT: Assets and Infrastructure

Print Date: 03 Apr, 2025

Risk Code	Risk Event	Primary Risk Category	Risk Type	Responsible Person	Causes	Risk Effects	Initial Impact	Initial Likelihood	Initial Risk Rating	Existing Controls	Risk Treatment	Revised Impact	Revised Likelihood	Revised Risk Rating	Risk Action Title
AFRIT01	Loss of Data	Technogical	Operational Risk	Malcolm Nicol IT Manager	Information security - unauthorised access to confidential Comhairle information through aggressive hacking or data loss including cyber attacks and/or hardware failure.	Reputational damage and significant financial consequences.	4.00 Major	2.00 Possible	Medium	Induction training for staff and annual security awareness training rolled out, reminders on log-on to network, published policies and guidance, IT procedures for server/PC setup, installation of firewalls and software to prevent unauthorised access. MFA rolled out to all staff. Block on access to network from outside UK. Staff unable to access network on personal devices.	Reduce the threat	4.00 Major	1.00 Unlikely	Low	Request for capital spend to purchase a third layer of data back-up.
AFRIT02	Loss of access to computer systems due to a disaster situation.	Technogical	Operational Risk	Malcolm Nicol IT Manager	Loss of access to computer room. Cyber attack.	Many key areas of the Comhairle unable to function effectively.	4.00 Major	2.00 Possible	Medium	Key Data Assets moved to Cloud Hosting.	Reduce the threat	3.00 Significant	2.00 Possible	Medium	Advance the Disaster Recovery Plan
AFRIT03	Loss of PSN Compliance	Technogical	Operational Risk	Malcolm Nicol IT Manager	New Government controls and a zero tolerance approach to remediation	Could lead to withdrawal of PSN connectivity affecting the Registration Service and Access to DWP information by Benefits	3.00 Significant	1.00 Unlikely	Low	Information Security Policy defines current controls and procedures. All software/hardware is approved by IT before purchasing. Annual PSN certification required evidence that controls are complied with.	Retain the threat	3.00 Significant	1.00 Unlikely	Low	
AFRIT04	Loss of Network provider.	Technogical	Operational Risk	Malcolm Nicol IT Manager	Openreach Exchange failure. Hardware failure within Server-room. Fibre damage caused by a third party provider. Loss of connectivity via the subsea cables to the mainland.	Possible loss of Wide Area Network services	3.00 Significant	1.00 Unlikely	Low	No control over these types of third party events.	Retain the threat	3.00 Significant	1.00 Unlikely	Low	
AFRIT06	Switch off of analogue by BT	Technogical	Operational Risk	Malcolm Nicol IT Manager	BT are due to switch analogue in 2025	A change will be required to all current analogue telephone services within the Comhairle. This will affect Faire, Fire Panel lines, lift lines and back up analogue phone connections.	4.00 Major	3.00 Likely	High	BT to provide the solution to mitigate against the switch off. IT are working through the Estate to cease non-required analogue lines and convert required lines to digital.	Reduce the threat	3.00 Significant	3.00 Likely	High	BT have compiled list of sites and numbers. IT can then identify services associated with analogue numbers and discuss potential impact with services. Separate risk assessments may have to be undertaken at service level.
AFRPI01	Winter Maintenance budget exceeded	Budget/Financial	Operational Risk	Calum Mackenzie - Chief Officer, Assets and Infrastructure	Prolonged sub zero weather conditions leading to road icing. Comhairle Policy and Winter Maintenance Operating Plan places minimum requirements on dealing with forecast conditions.	Central deficit to Comhairle.	3.00 Significant	2.00 Possible	Medium	Implementation of Comhairle policy. Keep salt stocks dry to reduce spread rates.	Retain the threat	3.00 Significant	2.00 Possible	Medium	
AFRPI02	Buildings become unsuitable for service delivery	Asset/Infrastructure	Operational Risk	Calum Mackenzie - Chief Officer, Assets and Infrastructure	Insufficient budget to undertake statutory and reactive building maintenance requirements. Insufficient budget to carry out effective investment planning. Not enough visibility of the overall issues for the whole estate.	Critical services unable to operate.	3.00 Significant	2.00 Possible	Medium	Budget monitoring and prioritisation of statutory requirements and requests for maintenance. Regular meetings with service departments to assess needs and outputs of statutory inspections.	Retain the threat	3.00 Significant	2.00 Possible	Medium	
AFRPI03	Reactive road maintenance is not undertaken	Asset/Infrastructure	Operational Risk	Calum Mackenzie - Chief Officer, Assets and Infrastructure	Road network condition deteriorates	Insufficient budget	2.00 Moderate	3.00 Likely	Medium	Budget monitoring and prioritisation of requests for maintenance	Retain the threat	2.00 Moderate	3.00 Likely	Medium	
AFRPI04	Failure to adequately fulfil Health and Safety responsibilities	Workforce	Operational Risk	Calum Mackenzie - Chief Officer, Assets and Infrastructure	Work practices lead to Health and Safety incident	Serious injury, acute/chronic illness, fatality, prosecution	4.00 Major	1.00 Unlikely	Low	Health and Safety Officers are in post and liaise directly with service managers on a regular basis.	Retain the threat	4.00 Major	1.00 Unlikely	Low	
AFRPI06	Unavailability of a building due to flooding.	Asset/Infrastructure	Operational Risk	Calum Mackenzie - Chief Officer, Assets and Infrastructure	Climate change / weather event	Roads impassable, bridges damaged, buildings inaccessible	3.00 Significant	3.00 Likely	High	Local Flood Risk Management Plan and Local and National Flood Risk Management Structure. OHCPP Climate Change Working Group is established and is working on an adaptation Plan for the Western Isles. Monitoring of flood events and establishment of local coordinating groups.	Retain the threat	3.00 Significant	3.00 Likely	High	

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AFRPI08	Delay to construction projects	Budget/Financial	Operational Risk	Calum Mackenzie - Chief Officer, Assets and Infrastructure	Cost and availability of construction materials. Construction sector capacity.	Project programme and cost affected	3.00 Significant	4.00 Almost Certain	High	Engaging with local contractors. Monitoring availability of key components.	Retain the threat	3.00 Significant	4.00 Almost Certain	High	
AFRPI09	Inadequate operational resources	Budget/Financial	Operational Risk	Calum Mackenzie - Chief Officer, Assets and Infrastructure	Budget cuts. Staff reductions. Increasing demands from Government initiatives.	Unable to delivery key objectives.	3.00 Significant	3.00 Likely	High	A review of resources is ongoing	Reduce the threat	2.00 Moderate	3.00 Likely	Medium	Carry out a review of resources required across service areas and restructure as necessary
MS001	Serious injury or death of employee or member of the public.	Compliance	Operational Risk	Colm Fraser - Head of Municipal Services	Failure to adequately fulfil Health and Safety responsibilities to employees or the Public.	Serious accident or death, subsequent legal costs and potential corporate and personal liability	4.00 Major	2.00 Possible	Medium	Health and Safety Committee established to focus on Municipal Services activities. Regular engagement with corporate Health and Safety advisor. Risk Assessments routinely reviewed. Continuous improvement regimes in place for workplace H&S.	Retain the threat	4.00 Major	2.00 Possible	Medium	
MS002	Breakdown in specialist plant.	Asset/Infrastructure	Operational Risk	Colm Fraser - Head of Municipal Services	Inadequate maintenance regime and servicing of critical major equipment and plant. Inadequate asset replacement programme.	Significant downtime and additional financial cost as some major items require to be sourced outwith the UK with extended lead in times. Reduced diversion of waste to recycling and increased burden on landfill disposal.	3.00 Significant	2.00 Possible	Medium	Clear replacement and maintenance policies. Some parts for plant held in stock to reduce delay but exposed to major plant component failure.	Retain the threat	3.00 Significant	2.00 Possible	Medium	
MS003	Vehicles (Bus na Comhairle or Garage operations) fail inspections by Traffic Commissioners.	Asset/Infrastructure	Operational Risk	Colm Fraser - Head of Municipal Services	Inadequate servicing of buses or vehicles by the Municipal Garage / inadequate management of bus operations / inadequate frequency of inspections of commercial HGV vehicles.	Vehicles ordered off road, penalties, revocation of Operator's Licence, cessation of bus operations.	3.00 Significant	1.00 Unlikely	Low	Operational staff qualified in CPC for Public Carrying Vehicle (PCV), Scheduled inspection and maintenance programme in place for all vehicles.	Retain the threat	3.00 Significant	1.00 Unlikely	Low	
MS005	Breach of regulations or PPC conditions at landfill site.	Compliance	Operational Risk	Colm Fraser - Head of Municipal Services	Contamination of landfill environs.	Enforcement notice, fines or suspension of activities.	2.00 Moderate	1.00 Unlikely	Low	Staff well acquainted with legislative requirements and PPC permit conditions.	Retain the threat	2.00 Moderate	1.00 Unlikely	Low	
MS006	Loss of pool of specialist vehicles (buses or refuse collection vehicles) or vehicle maintenance provision as a result of fire.	Asset/Infrastructure	Operational Risk	Colm Fraser - Head of Municipal Services	Major fire incident at garaging facilities or depot.	Unable to deliver core services, programme of vehicle inspections, service and repair not possible, breach of operator licence conditions.	3.00 Significant	1.00 Unlikely	Low	Programme of fire safety inspection is maintained. Premises have up to date fire inspections, alarms, etc.	Retain the threat	3.00 Significant	1.00 Unlikely	Low	
MS007	Shortage of HGV drivers.	Workforce	Operational Risk	Colm Fraser - Head of Municipal Services	Brexit. The industry is heavily reliant on European drivers. No HGV training or testing took place during the pandemic although this has returned to normal now. Increased risk to remote areas due to the lack of population to fulfil jobs.	Unable to deliver services.	2.00 Moderate	2.00 Possible	Low	Succession planning route is in place for existing staff. Formal training is available on the mainland and we have been able to generate interest in driver training within our Cleansing team.	Retain the threat	2.00 Moderate	2.00 Possible	Low	Look at options for supporting training for HGV drivers.
MS008	The ban on landfilling of Biodegradable Municipal Waste (BMW) Disposal, post 1 January 2026	Compliance	Operational Risk	Colm Fraser - Head of Municipal Services	Implementation of national waste regulation banning the landfilling of BMW.	Unable to dispose of the islands' BMW waste, without breaching legislation.	4.00 Major	2.00 Possible	Medium	Treatment plant and agreed and approved route for Uist and Barra Waste in progress- implemented April 2025.	Reduce the threat	3.00 Significant	2.00 Possible	Medium	Secure haulage and disposal of 6000 tonnes of BMW to approved EFW plants.
MS009	Shortage of Passenger Carrying Vehicles (PCV) drivers	Workforce	Operational Risk	Colm Fraser - Head of Municipal Services	Small pool of available locally qualified drivers. Long-term sicknesses and aging workforce. Increased risk to remote areas due to the lack of population to fulfil jobs.	Unable to deliver services.	2.00 Moderate	3.00 Likely	Medium	External recruitment.	Reduce the threat	2.00 Moderate	2.00 Possible	Low	Look at options for supporting training for PCV drivers from other Services' staff.

Risk Register - Chief Executive's Directorate

Print Date: 03 Apr, 2025

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CEU02	Unable to meet funding deadlines.	Budget / Financial	Operational Risk	David Macleay - Team Leader Community Engagement	Staff time is diluted across equitable geographical areas.	Unable to deliver services. Local communities suffer through missed Community Wealth Building projects.	2.00 Moderate	2.00 Possible	Low	Resources in place to deal with new years possible funding announcements.	Retain the threat	2.00 Moderate	2.00 Possible	Low	
CEU03	Incorrect advice given to Community groups.	Reputational	Operational Risk	David Macleay - Team Leader Community Engagement	Procurement protocols not followed correctly. Lack of resources.	Negative audit report. Legal action. Reputational damage.	3.00 Significant	1.00 Unlikely	Low	Work in close Partnership with HIE. Close relationships at all levels and services remains high.	Retain the threat	3.00 Significant	1.00 Unlikely	Low	
CEU04	CLD statutory provision outcomes are weakened.	Social	Operational Risk	Fiona MacInnes - Extended Learning Manager	Financial uncertainty. Lack of resources, particularly around administrative support.		2.00 Moderate	2.00 Possible	Low	National frameworks. Team is currently fully staffed.	Retain the threat	2.00 Moderate	2.00 Possible	Low	
AFRIT05	Unauthorised use of Comhairle's Social Media accounts	Reputational	Operational Risk	David Macleay - Team Leader Community Engagement	Disgruntled employee with access to account	Reputational damage to the Comhairle	2.00 Moderate	2.00 Possible	Low	Procedure in place to grant access to current social media accounts credentials. Form has to be filled in and access granted via HR	Retain the threat	2.00 Moderate	2.00 Possible	Low	
ID01	Project objectives relating to safety, cost, programme and customer expectations are not met.	Asset / Infrastructure	Operational Risk	Dan MacPhail - Project Manager	Ineffective management of safety, progress, expenditure and customer relationships.	Unsuccessful project delivery.	4.00 Major	2.00 Possible	Medium	Effective project management methods employed by Investment Delivery and include project risk management.	Retain the threat	4.00 Major	2.00 Possible	Medium	
ID02	Unable to secure competitive and affordable construction tenders; reduced positive contribution to local economy.	Budget / Financial	Operational Risk	Dan MacPhail - Project Manager	Lack of appetite, capacity and competitiveness in regional and local supply chains.	Construction not affordable.	3.00 Significant	3.00 Likely	High	Early contractor engagement and market-testing through use of procurement frameworks; main contractors encouraged to utilise local supply chain. Partnership working with Education, Business Gateway, HHP, NHS Eilean Siar to provide local supply chain with visibility of future workload.	Reduce the threat	3.00 Significant	2.00 Possible	Medium	Ensure project scope is creditable under scrutiny. Demonstrate robust market testing to inform effective liaison with partners/Government by Members and senior officers with respect to securing funding.
ID03	Long-term absence or loss of staffing resource from Investment Delivery.	Workforce	Operational Risk	Dan MacPhail - Project Manager	Reducing Comhairle resources resulting in decreased resilience. Annual leave, sickness, family responsibilities etc.	No cover due to small team. Negative impact on programme.	3.00 Significant	2.00 Possible	Medium	Lack of internal capacity and resilience requires increased reliance on and use of external consultants	Retain the threat	3.00 Significant	2.00 Possible	Medium	
ID04	Poor performance of external consultants; including lack of continuity of key personnel; external workforce issues outwith control of Investment Delivery.	Asset / Infrastructure	Operational Risk	Dan MacPhail - Project Manager	Minimal staffing within Investment Delivery and high reliance on external consultants.	Negative impact on performance relating to project safety, programme, expenditure and outcomes.	3.00 Significant	2.00 Possible	Medium	Procurement strategy and processes involving SCAPE and Hub North Frameworks which have performance criteria against management of contracting partners.	Retain the threat	3.00 Significant	2.00 Possible	Medium	

Risk Register - Children's Services

Print Date: 13 Mar, 2025

Risk Code	Risk Event	Primary Risk Category	Risk Type	Responsible Person	Causes	Risk Effects	Initial Impact	Initial Likelihood	Initial Risk Rating	Existing Controls	Risk Treatment	Revised Impact	Revised Likelihood	Revised Risk Rating	Risk Action Title
ES&CSCS01	Clients are at risk of significant harm	Reputational	Operational Risk	Jack Libby - Chief Officer, Children's Services (Chief SWO)	More cases with a greater degree of complexity. Rate of referrals to Children and Families has increased of the last two years coinciding with efficiency savings. Service has now had to introduce a waiting list for outreach respite and short break care.	Significant harm comes to the client. The Comhairle could face reputational and financial damage. Legal action against Comhairle.	4.00 Major	2.00 Possible	Medium	Enhanced governance structures in place. Self evaluation and quality assurance. Supervision and more regular case file audits	Retain the threat	4.00 Major	2.00 Possible	Medium	
ES&CSCS04	Lack of sufficient local placements	Budget/Financial	Operational Risk	Jack Libby - Chief Officer, Children's Services (Chief SWO)	Lack of Foster Carers Lack of Residential Capacity due to budget cuts Lack of suitable educational provision	A Young person in a placement that does not match their needs. Young person may have to move from their own community or to the mainland.	3.00 Significant	3.00 Likely	High	Regular reporting a review of placements. Audit activity. Regular management meetings to ensure that the service is prioritising effectively. Service has now had to introduce a waiting list for outreach respite and short break care. Thoroughly exploring kinship placements. Progressing with family group conferencing.	Reduce the threat	3.00 Significant	2.00 Possible	Medium	Review existing service delivery model through the use of WFWF in order to manage and reduce the number of referrals coming to Children & Families. Review the current fee paid fostering scheme.
ES&CSCS05	Statutory assessments are not completed in time	Reputational	Operational Risk	Jack Libby - Chief Officer, Children's Services (Chief SWO)	The level of need for assessments exceeds the staff resource available. Staff sickness absences. Inability to recruit suitably qualified staff.	Children's and Young People's needs going unmet for longer and possibly remaining at risk. Failure to meet statutory deadlines would be a key focus of the next inspection of children's services.	2.00 Moderate	3.00 Likely	Medium	A Social Work Trainee post has been established using existing resources. Working in partnership with SCRA to reduce level of reports requested e.g. level of requests for early reviews.		2.00 Moderate	3.00 Likely	Medium	
ES&CSCS06	Elements of a Child's Plan fail to be delivered	Reputational	Operational Risk	Jack Libby - Chief Officer, Children's Services (Chief SWO)	Insufficient staff and/or financial resources to respond to all elements of a Child's Plan.	Lack of mitigation to reduce the level of risk and or need to the child or young person and others resulting in possible harm to the Child or young person. Any increase in the risk or the needs of the child or young person will increase the demand for resources both staffing and financial. Particular types of intervention for young people involved in offending behaviour not undertaken.	2.00 Moderate	3.00 Likely	Medium	A Social Work Trainee post has been established using existing resources. Reviewing the terms of reference of the locality planning group.	Retain the threat	2.00 Moderate	3.00 Likely	Medium	

Risk Register - CHIEF EXECUTIVE'S DEPARTMENT: Economic and Community Regeneration

Print Date: 13 Mar, 2025

Risk Code	Risk Event	Primary Risk Category	Risk Type	Responsible Person	Causes	Risk Effects	Initial Impact	Initial Likelihood	Initial Risk Rating	Existing Controls	Risk Treatment	Revised Impact	Revised Likelihood	Revised Risk Rating	Risk Action Title
HER01	Comhairle unable to financially support Gaelic organisations in the Outer Hebrides at the current level.	Political	Operational Risk	Colin George Morrison - Team Leader - Heritage and Culture	Reduction in funding from public bodies.	Heritage and culture of the OH is diluted. Reduction in Gaelic posts. Reduction in Gaelic events. Reduction in Gaelic speakers. Reduction in opportunities for the use of Gaelic in the community. Direct hit on the local economy that relies heavily on Gaelic posts.	3.00 Significant	3.00 Likely	High	Gaelic Language Plan	Retain the threat	3.00 Significant	3.00 Likely	High	
DEVED001	Declining financial and staff resources to enable delivery of all Business Plan and service objectives.	Budget / Financial	Operational Risk	Anne M Murray - Chief Officer, Economic & Community Regeneration	Need to implement savings due to significant decline in service budgets. Uncertainty surrounding ongoing impacts of cyberattack.	Inability to delivery existing Business Plan objectives, & less staff and resources to respond to new opportunities.	2.00 Moderate	3.00 Likely	Medium	On going staff prioritisation of activities.	Reduce the threat	2.00 Moderate	2.00 Possible	Low	Prioritise workload as per the Service Business Plan
DEVDS002	Ongoing reliance on a small number of existing qualified staff.	Workforce	Operational Risk	Anne M Murray - Chief Officer, Economic & Community Regeneration	Ongoing challenges in recruitment of qualified staff. Significant no. and complexity of planning applications. Development posts are part of a competitive market.	Failure to delivery statutory services to required standard. Specific pressure on Planning Service re significant Energy Development workstreams and new Development Plan process.	3.00 Significant	3.00 Likely	High	Increased flexibility and development of staff achieved by training staff in other service areas	Reduce the threat	3.00 Significant	2.00 Possible	Medium	Development and implementation of workforce plan across services.
DEVED003	Proposed new grid connection to the Outer Hebrides does not materialise.	Political	Operational Risk	John Cunningham - Chief Planning Officer		Missed opportunity for transformational change to the island economy.	3.00 Significant	2.00 Possible	Medium	Good links with all interested parties in order to represent Outer Hebrides interests.	Retain the threat	3.00 Significant	2.00 Possible	Medium	
HER03	The condition in which existing Museum nan Eilean collections are stored has detrimental impact on collections.	Reputational	Operational Risk	Colin George Morrison - Team Leader - Heritage and Culture	Lack of resource.	Detrimental impact on collections held by Museum nan Eilean.	2.00 Moderate	3.00 Likely	Medium	Good level of knowledge on existing collections, environmental requirements and their condition.	Reduce the threat	2.00 Moderate	2.00 Possible	Low	Seek funding for collections resource centre, identify other measures to improve environmental conditions in existing facilities.
HER04	Unable to adequately capture historical archaeological finds.	Reputational	Operational Risk	Colin George Morrison - Team Leader - Heritage and Culture	Lack of resources	Historical archaeological sights are damaged. Lost opportunity to uncover archaeological finds.	2.00 Moderate	3.00 Likely	Medium		Retain the threat	2.00 Moderate	3.00 Likely	Medium	
HER05	Fail to achieve Museum re-accreditation for Museum nan Eilean Lewis Castle and Lionacleit, and accreditation for Tasglann nan Eilean.	Budget / Financial	Operational Risk	Colin George Morrison - Team Leader - Heritage and Culture	Insufficient resources to meet accreditation criteria.	Missed funding opportunities. Unable to partner with other accredited museums. Negative effect on partnerships with key national bodies; the loss of the Chessmen and the many other national loans and the inability to apply for allocation of Treasure Trove Scotland finds. Serious reputational damage.	3.00 Significant	2.00 Possible	Medium	Museum Forward Plan being developed includes resource allocation/deployment to ensure preparation in advance of re-accreditation/accreditation timelines.	Retain the threat	3.00 Significant	2.00 Possible	Medium	

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DEVED006	Uncertainty of availability or access to External Funds or Funding Programmes	Social	Operational Risk	Domhnall MacDonald - Economic Development Manager	Brexit. Discontinuation of the LEADER Programme.	Fewer sources of financial support for businesses and community organisations. Unable to forward plan with certainty if no (or reduced) future External Funds or Funding Programmes to deliver and support emerging Scottish Government and Comhairle priorities, therefore stifling innovation and growth. Fewer match-funding options and opportunities to support longer-term project development, e.g. Islands Growth Deal and Renewable Energy supply-chain. Wider local economic and community development suffers. Negative effect on the overall wellbeing of the islands. Redundancies.	3.00 Significant	3.00 Likely	High	New Outer Hebrides Economic Development Strategy being developed (currently at consultation stage). Ongoing lobbying at political level for greater (and special) external funding sources for island areas.	Retain the threat	3.00 Significant	3.00 Likely	High	
DEVED007	Funding for Medical Adaptations is fully spent before the end of the Comhairle's 5-year Capital Programme	Budget / Financial	Operational Risk	Iain Watson - Housing Services Manager	Capital Budget allocation insufficient to meet the demand for this Statutory Service.	Failure to deliver Statutory Duty towards clients with health/mobility issues requiring adaptations to their private sector homes	3.00 Significant	3.00 Likely	High	Partnership approach between IJB Occupational Health Team, Care & Repair and Housing Services involving budget monitoring, forecasting caseload and regular review of their Joint Policy for Adaptations.	Reduce the threat	3.00 Significant	2.00 Possible	Medium	Seek to increase the funding allocation in the Capital Programme

Risk Register - Education and Children's Services Directorate

Print Date: 13 Mar, 2025

Risk Code	Risk Event	Primary Risk Category	Risk Type	Responsible Person	Causes	Risk Effects	Initial Impact	Initial Likelihood	Initial Risk Rating	Existing Controls	Risk Treatment	Revised Impact	Revised Likelihood	Revised Risk Rating	Risk Action Title
ES&CSDir01	Management failure to implement planned savings	Budget / Financial	Operational Risk	Iain G Smith - Service Manager – Resources	Managers lack time and focus to deliver efficiencies to meet required savings targets	Budget overspend impacts on service delivery	3.00 Significant	2.00 Possible	Medium	Education Vacancy Panel in place. RTCR procedure in place. Monthly budget monitoring by Resources Section. Quarterly monitoring meetings of Directorate to monitor achievement of savings scheduled into the annual Diary.	Retain the threat	3.00 Significant	2.00 Possible	Medium	
ES&CSDir02	High level of staff absence	Workforce	Operational Risk	Neil MacLeod - Service Manager – Performance & Staffing	Workload pressures Staff sickness	Service delivery not at optimum level	3.00 Significant	3.00 Likely	High	Sickness absence monitoring and report. Return to work interviews. Sickness absence reviews.	Retain the threat	3.00 Significant	3.00 Likely	High	
ES&CSDir03	Incidents or Traffic accidents on home to school transport or ASN Transport	Reputational	Operational Risk	Iain G Smith - Service Manager – Resources	Insufficient monitoring of / or performance of contractors including monitoring and PVG checks. Unsafe vehicles and drivers providing ASN transport.	Serious injury Litigation	3.00 Significant	1.00 Unlikely	Low	Home to School Transport contracts contain stringent performance and safety rules monitored by TS Client function on behalf of Education and Children's Services Department. Staff driving vehicles with pupils on board required to have appropriate training. GPS trackers in new ASN vehicle fleet to monitor vehicle position and driver performance and safety. Wearing of seatbelts is now compulsory on school transport vehicles and ASN vehicles.	Retain the threat	3.00 Significant	1.00 Unlikely	Low	
ES&CSDir04	Digital infrastructure in schools not sustainable.	Technogical	Operational Risk	Iain G Smith - Service Manager – Resources	Lack of funding to support digital infrastructure in schools (CNES capital allocation for IT is £250k for 5 years). Old switches (12 years old) and Wifi access points failing and digital devices becoming obsolete. Scottish Government failure to provide promised funding for digital devices for schools.	Lack of effective digital teaching and learning devices available for teachers or school pupils.	3.00 Significant	3.00 Likely	High	Schools IT firefighting to maximise use of available budget. Installation of SSD drives and additional RAM being undertaken for school devices.	Reduce the threat	3.00 Significant	2.00 Possible	Medium	Replace Switches, Wifi access points and digital devise in primary schools
ES&CSDir06	Staff required to carry heavy and awkward items up and down stairs	Workforce	Operational Risk	Neil MacLeod - Service Manager – Performance & Staffing	Lift not working	Serious injury to staff	3.00 Significant	2.00 Possible	Medium	Staff are advised to follow manual handling recommendations Item to be retained on Health & Safety agenda	Retain the threat	3.00 Significant	2.00 Possible	Medium	

Risk Register - Education

Print Date: 14 Mar, 2025

Risk Code	Risk Event	Primary Risk Category	Risk Type	Responsible Person	Causes	Risk Effects	Initial Impact	Initial Likelihood	Initial Risk Rating	Existing Controls	Risk Treatment	Revised Impact	Revised Likelihood	Revised Risk Rating	Risk Action Title
ES&CSSCL01	Inability to staff educational settings to the required levels.	Workforce	Operational Risk	Donald A. Macleod - Chief Officer, Education and Children's Services	High sickness rates Lack of suitable Supply Teachers in geographical areas	Schools are closed Not able to deliver 190 days of education to pupils	3.00 Significant	3.00 Likely	High	Open and continuous recruitment for supply teachers. Retention of retired staff for supply purposes. Use of e-sgoil online teaching where supply is not available. Use of non specialist teachers in emergencies.	Retain the threat	3.00 Significant	3.00 Likely	High	
ES&CSSCL02	Inability to recruit Gaelic Medium Education secondary and primary teachers and other non-teaching support staff including those in Early Learning and Childcare settings	Workforce	Operational Risk	Donald A. Macleod - Chief Officer, Education and Children's Services	Insufficient availability of Gaelic fluent staff for schools Competing demand from other authorities for Gaelic fluent staff Wide competition for Gaelic speakers	Inability to meet statutory requirements for education Failing to meet Gaelic educational requirements	3.00 Significant	3.00 Likely	High	Supported sponsorship for Gaelic fluent staff to access teacher training Regular and enhanced promotion of Gaelic posts Promoting Gaelic opportunities to school leavers Incentivised posts Access to Gaelic language learning programmes	Retain the threat	3.00 Significant	3.00 Likely	High	
ES&CSSCL03	e-Sgoil service reduces or stops	Budget / Financial	Operational Risk	Donald A. Macleod - Chief Officer, Education and Children's Services	Re prioritisation of funding by Government e-Sgoil funding reduces or stops	Inability to continue to deliver the service both at local and national level. Staffing redeployment issues Pupils do not have equitable access to learning	3.00 Significant	2.00 Possible	Medium	Open dialogue with Government Prioritisation of Gaelic resource within e-Sgoil	Retain the threat	3.00 Significant	2.00 Possible	Medium	
ES&CSSCL04	Gaelic Grant reduces or stops	Budget/Financial	Operational Risk	Donald A. Macleod - Chief Officer, Education and Children's Services	Re prioritisation of Government funding Changes to grant criteria and eligibility	Budget shortfall in staffing costs Possible staff reduction Reduction in breadth of Gaelic services	3.00 Significant	2.00 Possible	Medium	Effective and timely report on spend Open dialogue with Government Budget management	Retain the threat	3.00 Significant	2.00 Possible	Medium	

Risk Register - CHIEF EXECUTIVE'S DEPARTMENT: Finance

Print Date: 05 Mar, 2025

Risk Code	Risk Event	Primary Risk Category	Risk Type	Responsible Person	Causes	Risk Effects	Initial Impact	Initial Likelihood	Initial Risk Rating	Existing Controls	Risk Treatment	Revised Impact	Revised Likelihood	Revised Risk Rating	Risk Action Title
SF02	IT systems unavailable	Budget / Financial	Operational Risk	Norman Macdonald - Chief Officer, Finance	IT upgrades unsuccessful and/or weekend/overnight routines not working. Power cut, destruction of IT server, IT system malfunctioning.	Unable to process benefits, undertake billing, account for monies collected, delays in processing, additional pressures on staff, additional overtime costs, one-off payments for omissions, reduced collection of revenues due.	3.00 Significant	2.00 Possible	Medium	Back up paper systems where appropriate.	Retain the threat	3.00 Significant	2.00 Possible	Medium	
SF03	Breaching the threshold for VAT partial exemption	Budget / Financial	Operational Risk	Norman Macdonald - Chief Officer, Finance	Failure to monitor the VAT partial exemption position	Loss of recoverable VAT income to the Comhairle	3.00 Significant	2.00 Possible	Medium	Regular review of partial exemption calculation. Monitoring VAT implications of large capital projects.	Retain the threat	3.00 Significant	2.00 Possible	Medium	
SF04	Inadequate cover for all Insurance risks	Budget / Financial	Operational Risk	Norman Macdonald - Chief Officer, Finance	Risk excluded by insurers concealed in small print	Comhairle exposed to non planned costs	2.00 Moderate	2.00 Possible	Low	Appoint and use Brokers especially to read the small print in documentation. Insurance Officer admin support post has completed a certificated insurance course and the Principal Accountant has been more actively involved in this area. The Marine Policies have been reviewed by an external consultant and Comhairle technical staff have been carrying out a review of property valuations, to ensure adequate cover is in place.	Retain the threat	2.00 Moderate	2.00 Possible	Low	
SF05	Loss of cash resources	Budget / Financial	Operational Risk	Norman Macdonald - Chief Officer, Finance	Failure of Financial Institution	Savings would be required to balance the budget and the Comhairle credit rating would fall	4.00 Major	2.00 Possible	Medium	Only approved institutions are used for investments. Limits are placed on sums invested. This is reviewed and updated on a daily basis on the advice of TM advisors. Adequately staffed TM function; segregation of duties; daily reporting to the Director for Assets, Finance & Resources. Regular Internal Audits.	Retain the threat	4.00 Major	2.00 Possible	Medium	
SF06	Loss of expertise and knowledge due to staff turnover	Workforce	Operational Risk	Norman Macdonald - Chief Officer, Finance	Reduction in staffing numbers due to budget reductions, long term illness and staff turnover.	Loss of strategic direction. Limited ability to provide the service. Errors, reduced performance and stress.	2.00 Moderate	3.00 Likely	Medium	Interim arrangements put in place and reviewed on a regular basis to ensure effectiveness. Managers and supervisors prioritise workload, teams able to cover each others duties. Multiple access to Albacs etc./relief staff. Procedure notes to enable cover by other AFR colleagues on basic functions. BCP assessment of critical activities.	Retain the threat	2.00 Moderate	3.00 Likely	Medium	
SF07	Payment made in error - creditors bank details, overpayment of hours/OT, use of procurement card	Legal	Operational Risk	Norman Macdonald - Chief Officer, Finance	Fraud by staff member of supplier	Financial loss to the Comhairle	3.00 Significant	1.00 Unlikely	Low	Authorised signatories, procedure sheets, restricted values of orders. Internal Audit regular review of compliance	Retain the threat	3.00 Significant	1.00 Unlikely	Low	

Risk Register - HEALTH AND SOCIAL CARE (IJB)

Print Date: 18 Mar, 2025

Risk Code	Risk Event	Primary Risk Category	Risk Type	Responsible Person	Causes	Risk Effects	Initial Impact	Initial Likelihood	Initial Risk Rating	Existing Controls	Risk Treatment	Revised Impact	Revised Likelihood	Revised Risk Rating	Risk Action Title
HSC01	People at risk of harm.	Compliance	Operational Risk	Emma MacSween - Chief Officer, Community Care and Partnership Services	Volume of referrals; complexity of caseloads; increased statutory duty activity; recruitment issues; regulator requirements; system pressures and activity to re-design service while maintaining frontline service; demographics and resultant impact on demand for services and supply of workforce.	Failure to address statutory duties in terms of timeframes and/or quality of interventions; service users at risk of harm; stakeholder dissatisfaction with service; delays in optimal allocation of resources; workforce stress.	4.00 Major	4.00 Almost Certain	Extreme	Investment in new records and management system; sharing of capacity issues with stakeholder agencies; skills mix of professional and non-professional grade practitioners maximised; investment in post graduate social work placements; use of agency as available and within budget; workforce plan incorporates proposals to be developed to re-design of social work staffing structure.	Reduce the threat	4.00 Major	3.00 Likely	High	Enhance the opportunities for trainee and alternative routes to obtaining professional qualification. Progress training for practice teacher qualifications to provide the necessary support and oversight capacity.
HSC02	Capacity of service workforce unable to fulfil service demand.	Workforce	Operational Risk	Emma MacSween - Chief Officer, Community Care and Partnership Services	Persistent recruitment and retention issues within health and social care sector; demographics and the associated impact on demand for services and challenges in recruiting and retaining workforce capacity.	Inability to provide statutory services; diminishing staff supply across sector; increased pressure on workforce; waiting lists for services; system pressures across acute and community; delayed discharges; non compliance with legislation; reliance on agency staff	4.00 Major	4.00 Almost Certain	Extreme	Workforce plans prioritising career pathway investment and development of undergraduate professional apprenticeships; enhanced recruitment offers; new model of care to support expansion of 24/7 care services; staff engagement and consultation to review existing working patterns and distribution of resources; training plans address workforce and service needs; peripatetic support for service management; MDT meetings to avoid admission and facilitate timely discharge; adopt mechanisms to sustain the workforce within health and social care when external service decisions impact of local provision.	Reduce the threat	4.00 Major	4.00 Almost Certain	Extreme	Maximise service user self-care and enable core services to be dedicated to on-going care provision; work with external providers to sustain capacity and address financial challenges directly impacting on the viability of the workforce and services. Maximising existing budgetary provision to re-design career pathways utilising the Island's Deal; recruitment offers and investment in training and workforce support; external recurring funding has been dedicated to expansion of the START service to enhance workforce capacity.
HSC03	Unsustainable IJB budget provision impacting on internally and externally commissioned services.	Budget / Financial	Operational Risk	Emma MacSween - Chief Officer, Community Care and Partnership Services	Lack of Government funding; recruitment and retention issues requiring locum/agency expenditure; demographics current and projected impacting on service demand; settlements to parent bodies less than cost of running services and meeting requirements; successful recruitment and retention will limit in year scope of vacancy factor to mitigate budget deficit; costs of workforce and service.	Vacancy factor application to budget management reduces the limit of service provision available and increases risk in terms of unmet need and the resilience of the deployed workforce; service reduction will impact on the capacity to provide a timely intervention and increase crisis intervention demand on services; crisis intervention costs may exceed timely intervention based activity; pressure on unpaid carers and service providers to sustain caring arrangements resulting in escalating risk when supports are unavailable or inadequate to meet need.	4.00 Major	4.00 Almost Certain	Extreme	Utilisation of reserves to balance budget for short term in place; reserves inadequate to meet the gap; budget monitoring routine at operational and strategic levels; IJB budget spend and pressures discussed in detail through Comhairle budget setting workshops and reinforced at the IJB through formal and informal meetings; options appraisal of service reduction shared with IJB members and Comhairle members with the high risk implications defined; officers and elected members engaged in profiling the challenges and risk locally and nationally; options appraisal commenced to address the circa £4m deficit in council services within the IJB in progress and initial assessment indicates a reduction in statutory service provision would be required to a level that would trigger compliance and regulatory action given the finite resources available and the implications for internal and external providers.	Reduce the threat	4.00 Major	4.00 Almost Certain	Extreme	Option appraisals to be produced by service managers in line with the requirements as directed by the Chief Officer and Chief Finance Officer in the first instance.
HSC04	Establishment of the National Care Service.	Legal	Operational Risk	Nick Fayers - Chief Officer - Health and Social Care	The uncertainty over the scope of the NCS and the governance implications.	The potential for inclusion or exclusion of services within the existing IJB or local authority in the proposed NCS has generated views relating to increased risk for service synergies and governance matters. The evolving nature of the NCS and the clarification or otherwise has raises a number of challenges and risks for the IJB, parent bodies and partner stakeholders locally and nationally.	3.00 Significant	2.00 Possible	Medium	Use of the local and national organisational mechanisms to express views regarding models of governance following the pausing of the NCS and the proposal for a National Board.	Retain the threat	3.00 Significant	2.00 Possible	Medium	
HSC05	Ongoing impacts of Cyber-attack.	Technogical	Operational Risk	Emma MacSween - Chief Officer, Community Care and Partnership Services	Malicious cyber attack on the local authority November 2023	Corporate systems and communication services, with the exception of email; compromised and inaccessible; loss of current and historic information held within corporate services and related systems; business continuity plans activated and relevant regulatory organisations involved in incident management. Consideration of short terms and longer term restoration of service being risk assessed to enable learning from risk event to shape systems development and information governance.	4.00 Major	3.00 Likely	High	Enhanced cyber security in place and operational with corporate oversight and testing of compliance. New systems of work post cyber attack have been embedded and operational challenges in services addressed. Corporate functions regarding finance systems and reporting adapted to enable business continuity while systems are re-built.	Reduce the threat	2.00 Moderate	3.00 Likely	Medium	Staff and service compliance with cyber security monitored and address when necessary. Financial processes for recording, reporting and monitoring in place.

Risk Register - HR, Strategy and Performance

Print Date: 11 Mar, 2025

Risk Code	Risk Event	Primary Risk Category	Risk Type	Responsible Person	Active	Causes	Risk Effects	Initial Impact	Initial Likelihood	Initial Risk Rating	Existing Controls	Risk Treatment	Revised Impact	Revised Likelihood	Revised Risk Rating	Risk Action Title
HR002	High level of staff absence	Workforce	Operational Risk	Norma Skinner - CE - Chief Officer, HR, Strategy and Performance	Active	Workload pressures. Lack of succession planning. Sickness. Maternity Leave. Caring responsibilities.	Skills, knowledge and experience are lost. Unable to provide service, increased costs.	2.00 Moderate	3.00 Likely	Medium	Staff flexibility - trained across various areas. Succession planning. Staff training.	Retain the threat	2.00 Moderate	3.00 Likely	Medium	
HR003	Increased workload and pressure on the HR Team. Staff expertise is lost.	Workforce	Operational Risk	Norma Skinner - CE - Chief Officer, HR, Strategy and Performance	Active	HR case management system is not implemented. Lack of resource. Organisational restructuring.	Unable to carry out a full and effective HR service. Work overload. Expected efficiencies not achieved. Reputational damage. Poor governance of sensitive information.	2.00 Moderate	3.00 Likely	Medium	Systems Administrators in place.	Reduce the threat	2.00 Moderate	2.00 Possible	Low	Ensure staff training and succession planning is in place. Monitor PI's to gauge efficiency of service. Look for efficiencies within processes.
HR004	Decrease in Employability Funding.	Budget / Financial	Operational Risk	Norma Skinner - CE - Chief Officer, HR, Strategy and Performance	Active	Uncertainty of funding streams. Changing Government priorities.	Comhairle is unable to meet the high expectations and demand of the service.	3.00 Significant	3.00 Likely	High	Maintain communication with Scottish Government to keep up-to-date with future plans. Lobbying for multi-annual funding. Effective management of existing funding streams.	Retain the threat	3.00 Significant	3.00 Likely	High	
HR006	Equal Pay Claims	Workforce	Operational Risk	Norma Skinner - CE - Chief Officer, HR, Strategy and Performance	Active	Changing Equal Pay case law. Changes in organisational structures. Gender pay gap.	Cost, reputational damage. Inability to recruit appropriately skilled people.	3.00 Significant	2.00 Possible	Medium	Continue to maintain and monitor the Comhairle's pay model and the Scottish Joint Council Job Evaluation Scheme. Monitor Equal Pay legislation and case law, and ensure procedures and practices are compliant.	Retain the threat	3.00 Significant	2.00 Possible	Medium	
HR008	Health & Safety incident	Workforce	Operational Risk	Norma Skinner - CE - Chief Officer, HR, Strategy and Performance	Active	Lack of training, safety equipment, resources, maintenance of equipment. Human error, unexpected absence of key personnel, inadequate management information, failure of outsourced services and facilities.	Injury, fatality, litigation claims, Health & Safety Executive fines.	4.00 Major	2.00 Possible	Medium	Fully staffed Health & Safety Team, Corporate H&S Policies & Procedures, Clear Management Roles & Responsibilities, ongoing Staff training, Risk Assessments, SSOW, Toolbox talks, Accident/ Near Miss/Dangerous Occurrence Reporting system (IR1). Implementation of Incident Reporting System on 1st April 2019.	Retain the threat	4.00 Major	2.00 Possible	Medium	
HR009	Unsuccessful implementation of the Case Management System Project	Workforce	Operational Risk	Norma Skinner - CE - Chief Officer, HR, Strategy and Performance	Active	Resources are already stretched. Lack of effective Project Management or lack of expertise.	Inefficient processes remain in place.	3.00 Significant	2.00 Possible	Medium	Use of Apprentices to backfill seconded posts during Project.	Reduce the threat	3.00 Significant	1.00 Unlikely	Low	Ensure sufficient Project Management is in place
CE011	Negative mental health or social wellbeing impact on employees	Workforce	Operational Risk	Norma Skinner - CE - Chief Officer, HR, Strategy and Performance	Active	Pressure on staff due to decreasing resources. Organisational Change.	Employee absence due to stress related illness. Increased costs.	3.00 Significant	2.00 Possible	Medium	Workforce Strategy. Wellbeing action plan is currently being revised. Revised department business plan.	Reduce the threat	3.00 Significant	1.00 Unlikely	Low	Establish a Stress Audit Programme

Risk Register - Law and Governance

Print Date: 06 Mar, 2025

Risk Code	Risk Event	Primary Risk Category	Risk Type	Responsible Person	Causes	Risk Effects	Initial Impact	Initial Likelihood	Initial Risk Rating	Existing Controls	Risk Treatment	Revised Impact	Revised Likelihood	Revised Risk Rating	Risk Action Title
IA01	Increase in theft/fraud or irregularities.	Compliance	Operational Risk	Sandy Gomez - Chief Internal Auditor	Cost of living crisis. Inadequate governance arrangements.	Loss of assets/resources and cash.	3.00 Significant	1.00 Unlikely	Low	Anti-money laundering regulations. National fraud initiative.	Retain the threat	3.00 Significant	1.00 Unlikely	Low	
IA02	Unable to carry out the Internal Audit Strategic Plan or Operational Plan.	Workforce	Operational Risk	Sandy Gomez - Chief Internal Auditor	No resilience in the event of staff sickness.	Loss of money. Non-compliance fines. Hand grant money back. Loss of reputation.	3.00 Significant	2.00 Possible	Medium		Retain the threat	3.00 Significant	2.00 Possible	Medium	
CE004	Failure to respond to enquiries/requests for information within statutory timescales (including FOI and complaints)	Legal	Operational Risk	Tim Langley - Chief Officer, Law and Governance	Lack of resources and time pressures on staff across all departments	Escalation to formal complaints and resultant consequences.	3.00 Significant	2.00 Possible	Medium	Continued monitoring of department response rates. Guidance, policies and procedures. Department. representatives. Existence of Publications Scheme on Comhairle's web site which aims to reduce the number of FOI requests (not currently functioning following cyberattack). Awareness raising sessions.	Retain the threat	3.00 Significant	2.00 Possible	Medium	
CE005	Resource issues on the Democratic Services during Elections. Snap Election.	Workforce	Operational Risk	Tim Langley - Chief Officer, Law and Governance	Statutory election demands.	Impact and pressures on existing administrative resources. In the event of a Snap Election unable to hold a Committee Series occurring at the same time.	3.00 Significant	2.00 Possible	Medium	A special meeting of Full Council would be held for necessary Reports. Flexibility within the team.	Retain the threat	3.00 Significant	2.00 Possible	Medium	
CE008	The Comhairle's procurement processes are not adhered to	Compliance	Operational Risk	Tim Langley - Chief Officer, Law and Governance	Lack of training and knowledge of procurement procedures.	Financial penalty. Inefficiencies.	3.00 Significant	2.00 Possible	Medium	Procurement policy and guide held on Intranet. Staff offered procurement training. Limited trained staff have access to PCF and PCF Tender portals. Procurement risk register owned by the Steering Group.	Reduce the threat	3.00 Significant	1.00 Unlikely	Low	Review Procurement Training Programme
CE010	Mishandling sensitive information	Legal	Operational Risk	Tim Langley - Chief Officer, Law and Governance	Human error. Remote working. Use of mobile devices. New/unknown ways of working with Case Management Systems.	Data security breach. Non-compliance resulting in fine. Harm caused to those whose data was mishandled.	3.00 Significant	2.00 Possible	Medium	Policies include data protection, and data security re home-working. Data Protection Training updated in 2025 post cyberattack and is now mandatory for all staff. IT lead on encryption, IT security etc. Data Protection Officer monitors the level of reported data breaches.	Retain the threat	3.00 Significant	2.00 Possible	Medium	
CE013	Lack of resilience within staffing levels.	Workforce	Operational Risk	Tim Langley - Chief Officer, Law and Governance	Reduced resources. Staff turnover.	Knowledge and expertise is concentrated in very small numbers of staff. Senior staff have to provide cover throughout the service.	2.00 Moderate	3.00 Likely	Medium		Retain the threat	2.00 Moderate	3.00 Likely	Medium	