

Strategic Risk Register

British Transport Police Authority & British Transport Police

19 September 2016



Publication History

Date	Version	Author	Changes
September 2016	0.1	Risk Management Coordinator, BTP	
September 2016	0.2	Risk Management Coordinator, BTP	Incorporation of changes required by BTP COG and BTPA Chair and Chief Executive
September 2016	1.0	Deputy Treasurer to BTPA	Incorporation of changes required by member of BTPA Audit and Risk Assurance Committee

The Strategic Risk Register is jointly owned by the Chief Constable of British Transport Police and the Chief Executive to the British Transport Police Authority.

© British Transport Police (September 2016) British Transport Police, Force Headquarters, 25 Camden Road, London, NW1 9LN www.btp.police.uk enquiries: 0800 40 50 40

Contents

- Introduction and background
- British Transport Police and British Transport Police Authority Joint Strategic Risk Register – High Level Summary
- 3. Navigating the Strategic Risk Register
- 4. Strategic Risk Register

Governance Risks

Non-compliance with the Management of Police Information Requirements and Data Protection Act 1998

Failure in Employer's Duty of Care

Insufficient Financial Management of the BTP Fund

Insufficient Number of Authority Members

Non-payment of PSA Charges by PSA Holders

Jurisdictional Risks

Failure to engage with the Infrastructure Policing Project

<u>Failure to engage effectively with the Joint Programme Board transferring the BTP role in</u> Scotland to the Scotlish Police Authority

Ability to Identify and Respond to Changes to Jurisdictional or Oversight Arrangements

Operational Risks

BTP has insufficient awareness and preparedness to mitigate the impact of a terrorist attack Failure to Meet Strategic Objectives

Failure to deliver effective transformation diminishes operational benefit and progress against Strategic Objectives preventing the inability to demonstrate efficiency and effectiveness

Implementation of Emergency Services Mobile Communications Technology

5. Sub-Strategic Risks

Appendix 1 – The Risk Assessment Process

1. Introduction and Background

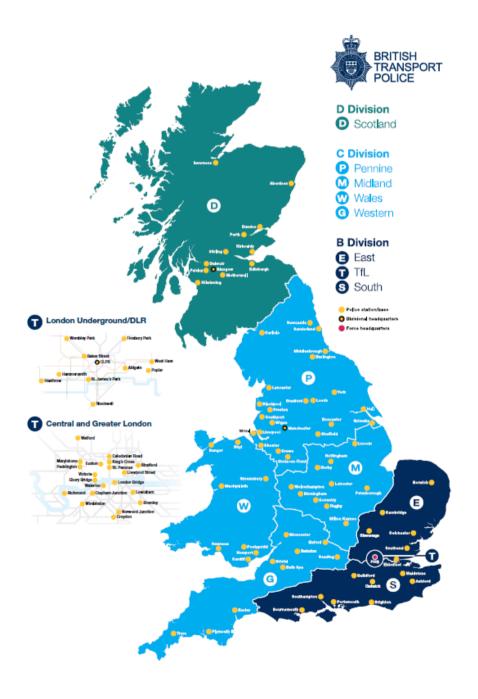
Risk assessment is a capability which underpins the work of the British Transport Police Authority (BTPA) and British Transport Police (BTP). The assessment of risk contained in the Strategic Risk Register lays the foundation for the development of work to prevent, mitigate respond to and recover from the recorded risks.

The joint Strategic Risk Register is made publically available to assist stakeholders and the travelling public in understanding the significant challengers currently facing BTPA and BTP.

Just because a risk is included in the Strategic Risk Register does not mean that it will happen, or that the impact would necessarily be as serious as the description provided. However, BTPA and BTP base our response, through planning on "reasonable worst case scenarios", informed by historical and scientific data, modelling and professional expert judgement of both the likelihood and impact of a risk on the register.

Each risk is assigned a score for impact and likelihood. Impact is ranked from Limited (1) to Catastrophic (4) and likelihood by how likely it is to happen in the next five years. There two scores are combined to give an overall risk rating.

The joint Strategic Risk Register is designed to provide a summary of the current position for the main risks affecting both BTPA and BTP. BTP operate a system of risks registers for Divisions and Sub-Divisions and Portfolios and Headquarters Departments to manage sub-Strategic risks.



2. British Transport Police Strategic Risk Register – High Level Summary

	Failure to engage with Infrastructure Policing Project	BTP has insufficient awareness and preparedness to mitigate the impact of a terrorist attack	
			Non-payment of PSA Charges by PSA-Holders
PACT	Insufficient Number of Authority Members	Failure in Employer's Duty of Care	Implementation of Emergency Services Mobile Communications Technology
NG IMI			Failure to Deliver Transformation Benefits
INCREASING IMPACT		Failure to engage with Joint Programme Board in relation to railway policing in Scotland	
INCF		Non-compliance with the Management of Police Information Requirements and Data Protection Act 1998	Failure to Meet Strategic Objectives
		Ability to Identify and Respond to Changes to Jurisdictional or Oversight Arrangements	Insufficient Financial Management of the BTP Fund
		Increasing LIKELIHO	OD

6

3. Navigating the Strategic Risk Register

The joint Strategic Risk Register currently contains 12 strategic risks. These are grouped into four areas; Goverance, Jurisdiction, Operational and People.

Each risk is assigned a unique Risk ID which relates to a more detailed and protectively marked, Individual Risk Assessment held on the British Transport Police 4Risk system.

Cause &	Risk Owner	Inherent Risk	Risk Control	Control Updated	Residual Risk	Action Required
Effect		Priority			Priority	Responsible Person
						Due Date

4. Strategic Risk Register – Risks

Cause & Effect	Risk Owner	Inherent Risk Priority	Risk Control	Control Updated	Residual Risk Priority	Action Required	Person Responsible	To be implemented by
Non-compliance with the management of police information requirements and Data Protection Act 1998 Cause:	Chief Constable	I = 3 L = 2 Moderate (6)	BTP perform internal audits at every location on the management of information	24 Aug 2016	I = 2 L = 2 Moderate (4)	Results of GIAA internal audit review of Information Management to be presented to	Treasurer to BTPA	29 Nov 2016
Non compliance with MoPI and the Data protection act could arise from an inadequate information management			Operation Canberra project put in place to respond to immediate records management required	24 Aug 2016		Any non compliance identified within Force to be communicated	Director of Capability and	29 Nov 2016
strategy, policy and processes. Effect: This will result in severe loss of stakeholder confidence and BTP/A reputation. Non-compliance can also lead to heavy fines.			Information Governance Board responsible for governance of information management issues .	24 Aug 2016		up to quarterly Authority Audit and Risk Assurance Committee	Resources	
to neavy lines.								
Failure in employer's duty of care Cause: A failure in BTP/A duty of care could occur	Chief Executive to BTPA	I = 3 L = 3 High (9)	Central health and safety board in place to appropriately govern	24 Aug 2016	I = 3 L = 2 Moderate (6)	GIAA to be commissioned to perform an internal audit of	Treasurer to BTPA	31 Aug 2016
as a result of weaknesses in the health and safety governance structure and	DIFA	A health and safety policy is in place	24 Aug 2016		health and safety - this will be reported to the Audit and Risk Committee			
ineffective management leading to increased accidents. Effect: This could have an adverse impact on the			Delivery of annual plan and BTP internal audit programme for H&S	24 Aug 2016			l	I
ability of the Authority to govern and create poor decision making.								
Insufficient Financial Management of the BTP Fund Cause:	Chief Executive to BTPA	I = 3 L = 4 High (12)	Forensic investigation undertaken to respond to weaknesses identified. The	24 Aug 2016	I = 2 L = 3 Moderate (6)	GIAA to be commissioned to perform an internal audit on financial control implementation.	Treasurer to BTPA	31 Aug 2016
Insufficient financial management of the BTP Fund Effect: This risk could result in loss of stakeholder			results have concluded that there is no evidence indicating fraudulent activity.			Effectiveness of implementation to be measured and reported upon to the Authority	Finance Director to BTP	30 Sep 2016
confidence. It could have a financial impact if additional cost for responding to the risk is required.			Finance Action Plan presented to DfT indicated the action being taken to respond to the issues identified. Regular updates	24 Aug 2016		Two weekly Finance Action Plan sessions to continue the scrutiny of progress.	Treasurer to BTPA	30 Sep 2016
			provided on progress made.			Stakeholder management briefing regarding overspend for 15/16 to be prepared	Chief Executive to BTPA	30 Sep 2016

3

Cause & Effect	Risk Owner	Inherent Risk Priority	Risk Control	Control Updated	Residual Risk Priority	Action Required	Person Responsible	To be implemented by
Insufficient number of Authority members Cause: The quorum of Members required by the Railway and Transport Safety Act 2003 is an odd number and a minimum of 11 (maximum of 18). There could be delays in the new membership proceedings. Effect: This could have an adverse impact on the ability of the Authority to govern and create poor decision making.	Chief Executive to BTPA	I = 3 L = 2 Moderate (6)	New members and a deputy chair recruitment to be completed by end of 2016 The Authority has now filled the Chair position and renewals for previous members have been made where appropriate.	24 Aug 2016 24 Aug 2016	I = 3 L = 1 Low (3)	Tracking of progress for recruitment to be made regularly through correspondence with DfT	Treasurer to BTPA	30 Sep 2016

9

Cause & Effect	Risk Owner	Inherent Risk Priority	Risk Control	Control Updated	Residual Risk Priority	Action Required	Person Responsible	To be implemented by
Non-payment of PSA charges by PSA-holders Cause: There is an increasing level of challenge	Chief Executive to BTPA	I = 4 L = 3 High (12)	Early communication of actual and provisional charges to allow customers to incorporate into their forecasts	23 Aug 2016	I = 3 L = 3 High (9)	An assessment of the integrity of the output of data and impact of the ISP project results is required	Chief Executive to BTPA	20 Sep 2016
om PSA holders on the basis for harges. This challenge will increase with continuing issues with the recording of time data and the decision by the			Regular cash flow forecasting for the coming year now incorporates any ongoing issues	23 Aug 2016		GIAA (Internal Audit) to be requested to perform an audit of the charging model and inputs in 16/17	Treasurer to BTPA	31 Aug 2016
Finance Committee to recover some of the 15/16 overspend from customers. Effect: PSA holders could legally challenge the			with PSA holders into assumptions to allow early foresight of cash flow issues.		The model will be run for Q1 and Q2 for 2016/17 to provide customers with an indication of final 2016/17 actual charges	Financial Modeller & Analyst	31 Dec 2016	
Authority upon receipt of the actual PSA charges if they believe they have been			BTPA employ an auditor to review crime allocation data	23 Aug 2016		final 2016/17 actual charges. The Chief Executive and the	Chief	30 Sep 2016
over- or incorrectly charged. This could result in a judicial review of the charging mechanism. Financially, this would cause increased legal fees and a negative cashflow impact if income suspended.			Full analysis of the actual charges to ensure that any changes are fully understood and can be articulated to the PSA holders in a meaningful way.	23 Aug 2016		Chief Constable will prepare a briefing note to have alongside meetings with all customers regarding the recovery of the 15/16 overspend	Executive to BTPA	30 Sep 2016
			PSA holders pay PSA charges via a direct debit arrangement	23 Aug 2016				
	Ī							
Failure to engage with Infrastructure Policing Project Cause:	Chief Executive to BTPA	I = 4 L = 2 Moderate (8)	A maintained continuity of services has been stipulated- this has not been defined.	23 Aug 2016	I = 4 L = 1 Moderate (4)	Influencing of discussions being held at the National Police Chiefs Council and National Policing Transformation Board	Chief Executive to BTPA	31 Oct 2016
Insufficient involvement and preparation to impact the Home Office Infrastructure Policing Project. Effect:			A project group has been established at BTPA to commence work to promote the requirement of the BTP.	23 Aug 2016		Briefing on the promotion of BTP/A to the necessary bodies will be presented to the Authority.	Chief Policy Officer to BTPA	10 Nov 2016
BTP/A governance and structure could be adversely affected from a decision to incorporate BTP into infrastructure policing.			The Authority Chair attends the challenge panel	23 Aug 2016		The Chief Executive will attend the Evaluation panel	Chief Executive to BTPA	31 Oct 2016

Cause & Effect	Risk Owner	Inherent Risk Priority	Risk Control	Control Updated	Residual Risk Priority	Action Required	Person Responsible	To be implemented by
Failure to engage effectively with the Joint Programme Board transferring the BTP role in Scotland to the Scottish Police Authority Cause: Insufficient involvement and preparation to impact the transfer of BTPs responsibility for policing that railways to Scotland to Police Scotland. Effect: There may be a delay in meeting the government intent. Lack of preparation could lead to an increase in costs or inability to recover income due. This could therefore cause an increase in costs to PSA holders.		I = 3 L = 3 High (9)	BTP/A has membership in the Joint Improvement Team A project manager will be employed by BTPA to manage the preparation and development phase	23 Aug 2016 23 Aug 2016	I = 2 L = 2 Moderate (4)	The Authority should be updated on any key communication at each quarterly meeting. Input into the legislative element of the process to avoid future costs to BTP/A is a priority for the project team.	Chief Policy Officer to BTPA Chief Executive to BTPA	10 Nov 2016 30 Oct 2016

11

Cause & Effect	Risk Owner	Inherent Risk Priority	Risk Control	Control Updated	Residual Risk Priority	Action Required	Person Responsible	To be implemented by
Ability to Identify and Respond to Changes to Jurisdictional or Oversight Arrangements Cause: Failure to identify, recognise and engage with changes to jurisdictional and/or	ersight Executive to BTPA Ingage in BTP	I = 3 L = 3 High (9)	A project group has been established at BTPA to commence work to promote the requirement of the BTP in relation to the Infrastructure Policing Project	31 Aug 2016	I = 2 L = 2 Moderate (4)	Maintain oversight and influence over the development of the transfer of responsibilities to Police Scotland in relation to the rail network in order to: protect the requirements of the	Chief Executive to BTPA	31 Mar 2019
governance arrangements Identified current issues include: - the engagement with the Joint Programme Board transferring the BTP			Inclusion of the Chair to the BTPA on the Infrastructure Policing Project challenge panel	31 Aug 2016		rail industry ensure that costs charged to the rail industry as a result of the transfer are minimised		
role in Scotland to the Scottish Police Authority -the engagement with the Infrastructure			A project manager will be employed by BTPA to manage the preparation and development phase of the transfer of responsibility from BTPA to the Scottish Police Authority	31 Aug 2016		The Chief Executive will attend the Evaluation Panel on the Infrastructure Project The project team to provide an immediate input into the legislative element of the Scotland process Ensure that the view of BTP and BTPA, and the needs of the rail industry are fully considered in	Chief Executive to BTPA	31 Mar 2017
Policing Project Effect:							Chief Policy Officer to	31 Mar 2017
Results in the failure to ensure that policing of the railway receives recognition			A maintained continuity of services has been stipulated in	31 Aug 2016			BTPA	
as a specialism in its own right, with a subsequent diminution of service level or increase in costs to the rail industry and PSA holders.			relation to the Infrastructure Policing Project - However, this has not been defined.				Chief Executive to BTPA	31 Mar 2017
F SA Holders.			BTP/A has membership in the Joint Improvement Team overseeing the transfer of responsibility of policing the rail network in Scotland to Police	31 Aug 2016		respect of the IPP by the National Police Chiefs Council and National Policing Transformation Board		
			Scotland					

Cause & Effect	Risk Owner	Inherent Risk Priority	Risk Control	Control Updated	Residual Risk Priority	Action Required	Person Responsible	To be implemented by
BTP has insufficient awareness and preparedness to mitigate the impact of a terrorist attack	Chief Constable	I = 4 L = 3 High (12)	A dedicated Counter-Terrorism Support Unit	31 Aug 2016	I = 4 L = 2 Moderate (8)	Regular assessment of capability in the context of a change	ACC Operations	28 Sep 2016
Cause:			Constant dynamic review of capability and capacity	19 Sep 2016		counter terrorism environment and threat - reported to the Authority on a quarterly basis.		
The ever changing intent and attack methodology of international terrorist groups			The existence of a fully tested and assured Go Critical plan	31 Aug 2016				
Effect:			Compliance with National Railways Security Programme.	23 Aug 2016				
The result could be loss of life, damage to critical national infrastructure and the loss of public and stakeholder confidence.			Ensuring an appropriate proportion of operational resources is deployed to Counter-Terrorism activities as determined by the STRA	31 Aug 2016				
			A programme of dynamic assessments of the operating environment	31 Aug 2016				
			Working in partnership with other police forces and relevant agencies to discharge BTP duties under the Strategic Policing requirement	31 Aug 2016				
			CT Strategic Threat and Risk Assessment in place and subject	19 Sep 2016				
			The focus of operational response on locations identified by the Strategic Risk and Threat Assessment (STRA)	31 Aug 2016				
			Access to and the utilisation of national intelligence – embedded in the national CT network	19 Sep 2016				

Cause & Effect	Risk Owner	Inherent Risk Priority	Risk Control	Control Updated	Residual Risk Priority	Action Required	Person Responsible	To be implemented by
Failure to meet strategic objectives Cause: The underpinning assumptions of the 2013-2019 Strategic Plan become	Chief Executive to BTPA	I = 3 L = 3 High (9)	Managing the expectations of the industry via communication with RDG groups and associated heads of security.	23 Aug 2016	I = 2 L = 3 Moderate (6)	Refine the strategic objectives within the governance review working group such that they meet stakeholder expectations	Chief Executive to BTPA	31 Oct 2016
irrelevant as a result of changes in the operating environment. (Eg due to changes in the threat of terrorism, funding			The Authority Chair is holding meetings with all key stakeholders	23 Aug 2016		and are achievable.		
arrangements, demand and legislative changes) Effect:			Maintaining investment in improving productivity and effectiveness.	23 Aug 2016				
Result in a perception of a reduction in the service provided to the rail industry and consequent loss of stakeholder confidence.			Ensuring the appropriate review of the annual policing plans to deliver strategic objectives.	23 Aug 2016				

Cause & Effect	Risk Owner	Inherent Risk Priority	Risk Control	Control Updated	Residual Risk Priority	Action Required	Person Responsible	To be implemented by
Failure to deliver effective transformation diminishes operational benefit and progress against Strategic	Chief Constable	I = 3 L = 4 High (12)	Employment of external expertise where in house skills are not available.	24 Aug 2016	I = 3 L = 3 High (9)	Method of measuring benefits to be established	Deputy Chief Constable	30 Sep 2016
Objectives Cause:	d		Adoption of the HM Treasury 5 stage Business Case model	31 Aug 2016		Tracking of inter-dependencies of projects	Constable	30 Sep 2016
Failure to deliver transformation benefits and embed necessary changes			Effective programme and project management overseen by SIB and Finance Committee	24 Aug 2016	-	Development of in-house skills to be performed to reduce reliance on third party consultants	Director of Capability and Resources	31 Mar 2017
Effect: If transformation activities are not appropriately tracked or managed , the			Rigorous enforcement of governance and approval	31 Aug 2016		Benefit realisation work required	Director of Capability and Resources	31 Mar 2017
whole or part of the transformation could fail or benefits not achieved. The result could be an increase in costs and			processes through Service Improvement Board (SIB) Early identification of remedy of	24 Aug 2016		Development of efficiency and effectiveness measurements to review performance	Director of Capability and Resources	31 Mar 2017
therefore a shortfall in funding or lack of increase in frontline capability. Officer and			risks to delivery	24 Aug 2016		HMIC to perform a review of	Treasurer to	30 Sep 2016
staff morale could also be negatively affected.			Provision of training and guidance for COG and BTPA members, and Senior Responsible Owners (SRO) as to responsibilities and obligations relating to project and	31 Aug 2016		Efficiency in the 16/17 inspection plan	BTPA	00 00p 2010
						Preparation for the October Efficiency Plan at DfT to commence. Authority to be	Director of Capability and Resources	20 Sep 2016
			Introduction and agreement of,	31 Aug 2016		Implementation of a more integrated MTFP progress-combining both operational and	Finance Director to BTP	31 Dec 2016
			contingency plans for projects where there is potential for imprecise costing at the business case stage			Ensure appropriate implementation of Crime and Demand review	Director of Capability and Resources	31 Dec 2016
			Setting, and agreement of clear parameters for projects and programmes at the initial stage	31 Aug 2016		Reporting of Finance Action Plan progress to the Finance Committee.	Finance Director to BTP	31 Mar 2017

Cause & Effect	Risk Owner	Inherent Risk Priority	Risk Control	Control Updated	Residual Risk Priority	Action Required	Person Responsible	To be implemented by
Implementation of Emergency Services Mobile Communications Technology Cause: DfT did not sign up with the Home Office	Chief Executive to BTPA	I = 3 L = 3 High (9)	The impact of potential costs will be included in the MTFP workings to quantify the potential impact over the next few years.	23 Aug 2016	I = 3 L = 3 High (9)	This issue will be elevated to the Accounting Officer at DfT once the value for money exercise has been undertaken.	Chief Executive to BTPA	31 Dec 2016
and Department of Health to initiate project and consider how to fund its initial stages. The down payment required for the project must now be recovered from BTP and others. Effect: If the surcharge must be recovered from			Identification required of the rationale for the surcharge in congruence with the DfT's dispute with the Home Office	23 Aug 2016		Consider not signing up to the project on offered terms (may well have operational implications)	Chief Executive to BTPA	30 Sep 2016
BTP/A the timing permitted for payment will have significant implications on budget and consequently operations.								

5. Sub-Strategic Risks held by BTP Chief Constable

Impact of Criminal Justice (Scotland) Act

ACC Crime (B)

Funding for Suicide Prevention and Mental Health Team Mobile Policing Project Loss of Network Rail Funding for CCTV

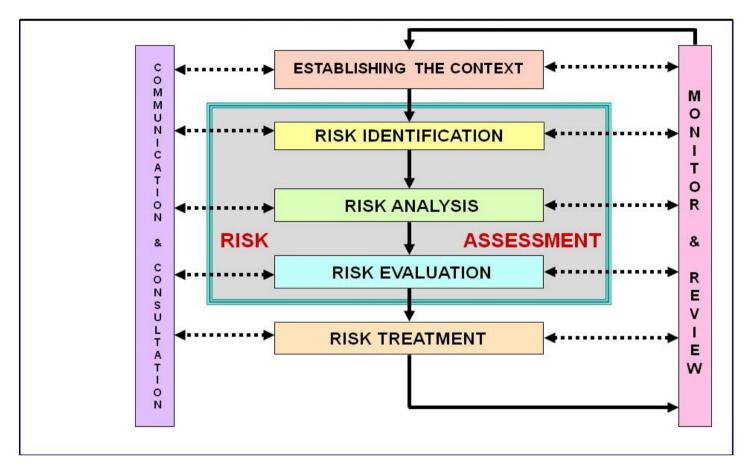
Director of Capability and Resources

Disaster Recovery
Failure to Deliver PSN-P Compliance
Failure of Contract Owners and SRO's to Manage Contract Risks
Failure to Maintain Expenditure within 2016-17 Budget Envelope

6. Heat Map of Operational Risks Managed Across BTP and BTPA

4		5	8	2	2	2	2	1	3	1		
3	4	17	28	30	8	17	11	13	8	9	5	
2		9	9	7	4	25	8	2	7	21	4	
1	1	7	2		10	8			37	11	1	
	1	2	3	4	1	2	3	4	1	2	3	4
	Inherent or Original Risk Rating				Residual or Current Risk Rating			Target Risk Rating				
	Likelihood Increasing on Horizontal Axis on Each Heat Map Impact Increasing Vertically											

Appendix AThe Risk Assessment Process



Impact and Likelihood scoring scales

Li	Likelihood of risk happening in the next 3 year period or lifetime of the Project					
1	Unlikely to happen within 3 years under normal circumstances, or requires a specific and unlikely characteristics. Unlikely to happen within 3 years under normal circumstances, or requires a specific and unlikely characteristics.					
		For Project risks, Unlikely to happen within the project lifetime under normal circumstances				
2	Possible	Could happen within 3 years under normal circumstances, or will happen within this timeframe unless specific action is taken to counter it For Project risks, Could happen within the project lifetime under normal circumstances				
3	Probable	Is likely to happen within 3 years under normal circumstances, or will happen within a year unless specific action is taken to counter it For Project Risks, Is likely to happen within the project lifetime under normal circumstances				
4	Probable and Imminent	Is likely to happen within a year under normal circumstances or will happen within the next six months unless specific action is taken to prevent it				
		For Project risks, is almost certain to happen within the project lifetime				

Impact Scores for Identified Risks						
			Performance			
	Safety	Reputation	and Service	Financial		
1	Minor injury	Minor localised specific Area damage caused by adverse local press coverage	Minimal threat to achieving key objectives, Or slight concerns over Service level in a specific Area			
2	Serious injury	Major localised specific Area but short term damage caused by adverse local press coverage	Significant threat to achieving key objectives, Or Stakeholders express concern at a specific drop in Service level within an Area	Costs of 5-10% of department / Area / Project budget incurred or loss funds to that amount.		
3	Single fatality	Major short -term damage caused by adverse National press coverage	Fail to achieve a key objective, Or Stakeholders write or minute their concern over significant drop in service level in several Divisions or Portfolios	Costs of 10-25% of department / Area/ Project budget incurred or loss of funds to that amount.		
4	Multiple fatalities	Major damage to reputation cause by sustained adverse national coverage. Possible Resignations	Fail to achieve several key objectives, Or Formal written notification to the Chief Constable of grave concern by stakeholders.	Costs of £5M or more incurred or loss of funds to that amount		

Likelihood and Impact ratings are combined to give an overall risk rating which will be between 1 for improbable low impact risks and 16 for almost unavoidable high impact events

Risk Matrix with Criticality Scores (1 to 16): Score = Probability x Impact

	Probable and Imminent 4	4	8	12	16	
←Probability →	Probable 3	3	6	9	12	
← Probâ	Possible 2	2	4	6	8	
	Remote 1	1	2	3	4	
	Impact →	Minor 1	Moderate 2	Significant 3	Major 4	

High risk Medium Risk Low risk 9-16 criticality score 4 -8 criticality score

1-3 criticality score



