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DATE: 17 June 2019

ADULT CARE AND HEALTH PDS INFORMATION BRIEFING

Meeting to be held on Tuesday 25 JUNE 2019

This briefing will only be debated if a member of the Committee requests a discussion be held, in which case please inform the Clerk 24 hours in advance indicating the aspects of the information item you wish to discuss. In addition, questions on the briefing should also be sent to the Clerk at least 24 hours before the meeting.

QUESTIONS ON THE INFORMATION BRIEFING

The Briefing comprises:

- 1 ADULT CARE AND HEALTH RISK REGISTER (Pages 3 - 32)**
- 2 OUTCOME OF SHARED LIVES INSPECTION (Pages 33 - 34)**

Members and Co-opted Members have been provided with advanced copies of the Part 1 (Public) briefing via email. The Part 1 (Public) briefing is also available on the Council website at the following link:

<http://cds.bromley.gov.uk/ieListMeetings.aspx?CId=559&Year=0>

Printed copies of the briefing are available to Members and Co-opted Members upon request by contacting Philippa Gibbs on 020 8461 7638 or by e-mail at Philippa.Gibbs@bromley.gov.uk.

**Copies of the Part 1 (Public) documents referred to above can be obtained from
<http://cds.bromley.gov.uk/>**

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Report No.
ECHS19045

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: ADULT CARE AND HEALTH POLICY DEVELOPMENT AND SCRUTINY COMMITTEE

Date: Tuesday 25 June 2019

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

Title: EDUCATION, CARE AND HEALTH SERVICES RISK REGISTER – QUARTER 4, 2018/19

Contact Officer: Naheed Chaudhry, Assistant Director Strategy, Performance and Engagement

Chief Officer: Kim Carrey, Interim DASS

Ward: N/A

1. Reason for report

- 1.1 Risk Management is the identification, analysis and overall control of those risks which can impact on the Council's ability to deliver its priorities and objectives. This report enables Members to scrutinise risks and the actions taken to control them in line with Audit Sub-Committee recommendations.
-

2. **RECOMMENDATION(S)**

2.1 Members are asked to note:

- An updated Education, Care and Health Services' Risk Register and the existing controls in place to mitigate the risks.

Impact on Vulnerable Adults and Children

1. Summary of Impact:
-

Corporate Policy

1. Policy Status: Not Applicable
 2. BBB Priority: Excellent Council Safe Bromley Supporting Independence Healthy Bromley
-

Financial

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

Personnel

1. Number of staff (current and additional):
 2. If from existing staff resources, number of staff hours:
-

Legal

1. Legal Requirement: Statutory Requirement Non-Statutory - Government Guidance None:
Further Details
 2. Call-in: Not Applicable
-

Procurement

1. Summary of Procurement Implications:
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected):
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments:

3. COMMENTARY

Background

- 3.1 Risk Management is the identification, analysis and overall control of those risks which can impact on the Council's ability to deliver its priorities and objectives. The Education, Care and Health Services Risk Register feeds into the Corporate Risk Register, via the Corporate Risk Management Group, and comprises the high level departmental risks which are underpinned by more detailed registers contained within the divisional business plans.
- 3.2 Audit Sub-Committee agreed that the Corporate and Departmental Risk Registers would be reviewed at their meetings twice a year and then subsequently scrutinised by the relevant PDS Committee. Internal processes require that the departmental risk registers be updated and agreed by the Departmental Leadership Team (DLT) on a quarterly basis and be reviewed by the Corporate Risk Management Group. The ECHS Risk Register was last scrutinised by Adult Care and Health PDS Committee in November 2018.
- 3.3 On 9 January 2019 the Departmental Leadership Team met with the Council's insurers, Zurich Insurers for a 'Check and Challenge' review of the ECHS Risk Register. A full review of the Risk Register was carried out and a number of amendments were made at the time. Further changes were made during the regular quarterly updates. The ECHS Risk Register 2018/19 Quarter 4 updates were agreed by ECHS DLT in April 2019.
- 3.4 The Education, Care and Health Services Risk Register is attached as Appendix 1. Members' attention is drawn to those risks of relevance to the Adult Care and Health Portfolio as detailed in the table below.

Risk Reference	Risk
1	Failure to deliver ECHS Financial Strategy
2	Failure to deliver effective Adult Social Care services
2a	Failure to deliver effective Learning Disability services
4b	Recruitment and Retention – Adult Social Care
4c	Recruitment and Retention - Housing
5	Failure to deliver effective Housing Needs services
5a	Temporary Accommodation
5b	Capital Grant
6	Inability to deliver an effective Public Health service
7	Business Interruption / Emergency Planning
8	Contracts and Service Level Agreements
11	Transport – School and Adult Social Care
18	Welfare Reform
19	Deprivation of Liberty
20	Data Collections
22	Failure to deliver partial implementation of Health & Social Care Integration
24	Social Care Information System

- 3.5 The following changes have made to the risks of relevance to the Adult Care and Health Portfolio since November 2018:
- One risk has been added to the Risk Register:
 - Risk 24 – Social Care Information System
 - Risk 4 – Recruitment and Retention has been divided into risks for Risk 4b - Adult Social Care and Risk 4c - Housing Needs

- Risk 11 – Transport – School and Adult Social Care has been amended to include Adult Social Care Transport
- Amendment to the gross and net (current) risk of five risks have been made:
 - Risk 4c – Recruitment and Retention – Housing – change of net risk from 16 to 12
 - Risk 5 – Failure to deliver effective Housing Needs services – change of net risk from 12 to 8
 - Risk 5a – Temporary Accommodation – changes of net risk from 20 to 16
 - Risk 18 - Welfare Reform – change of gross risk from 12 to 16
 - Risk 19 – Deprivation of Liberty – change of gross risk from 12 to 16

3.6 Mitigating actions have seen five high risks reduced to significant risk, four high risks reduced to medium risks, one significant risk reduced to medium risk and one medium risk reduced to low risk.

Level of Risk	Gross Risk		Net Risk	
	No.	%	No.	%
High	13	76%	4	24%
Significant	1	6%	5	29%
Medium	2	12%	6	35%
Low	1	6%	1	6%
Total	17	100%	17	100%

4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

5. The controls already in place and the further actions outlined in the Risk Register mitigate against adverse impacts on vulnerable children.

6. POLICY IMPLICATIONS

There are no policy implications arising directly from this report. Any policy implications arising from the existing controls and the further action required to mitigate against the risks are reported to the Sub-Committee separately.

7. FINANCIAL IMPLICATIONS

There are no financial implications arising directly from this report. Any financial implications arising from the existing controls and the further action required to mitigate against the risks are reported to the Sub-Committee separately.

8. PERSONNEL IMPLICATIONS

There are no personnel implications arising directly from this report. Any personal implications arising from the existing controls and further action to mitigate against the risks are reported to the Sub-Committee separately.

9. LEGAL IMPLICATIONS

There are no legal implications arising directly from this report. Any legal implications arising from the existing controls and further action to mitigate against the risks are reported to the Sub-Committee separately.

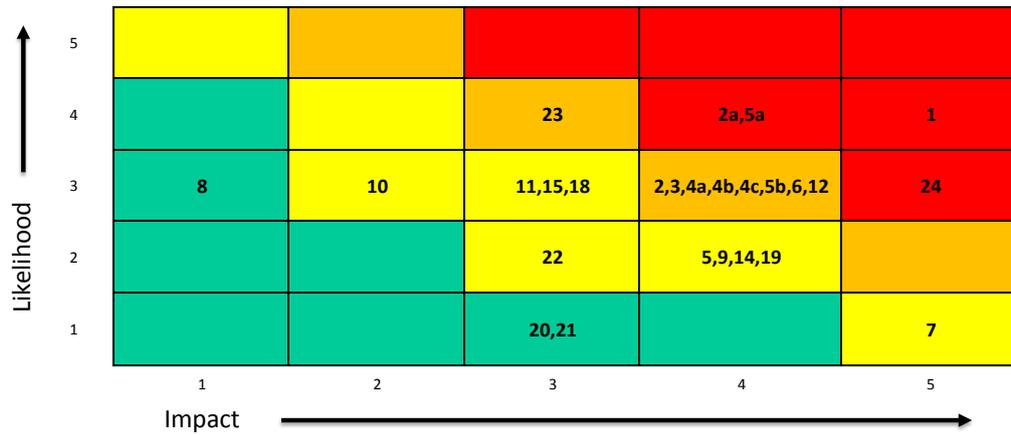
10. PROCUREMENT IMPLICATIONS

There are no procurement implications arising directly from this report. Any procurement implications arising from the existing controls and further action to mitigate against the risks are reported to the Sub-Committee separately.

Non-Applicable Sections:	[List non-applicable sections here]
Background Documents: (Access via Contact Officer)	[Title of document and date]

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ECHS Risk Register



Risk Ref	Risk Description	Gross Risk Rating	Net Risk Rating
1	Failure to deliver ECHS Financial Strategy	25	20
2	Failure to deliver effective Adult Social Care services	16	12
2a	Failure to deliver effective Learning Disability services	16	16
3	Failure to deliver effective Children's services	15	12
4a	Recruitment and Retention - CSC	20	12
4b	Recruitment and Retention - ASC	20	12
4c	Recruitment and Retention - Housing	20	12
5	Failure to deliver effective Housing Needs services	16	8
5a	Temporary Accommodation	20	16
5b	Capital Grant	16	12
6	Inability to deliver an effective Public Health service	16	12
7	Business Interruption / Emergency Planning	10	5
8	Contracts and Service Level Agreements	4	3
9	School Place Planning	12	8
10	Not in Education, Employment or Training (NEET)	6	6
11	Transport - School and Adult Social Care	15	9
12	SEND Reforms	16	12
14	Youth Offending	12	8
15	Out of Borough Placements (Children and Young People)	9	9
18	Welfare Reform	16	9
19	Deprivation of Liberty	16	8
20	Data Collections	9	3
21	30 hours funded childcare for three and four year olds of working parents	3	3
22	Failure to deliver partial implementation of Health & Social Care Integration	6	6
23	Speech and Language Therapy	12	12
24	Social Care Information System	20	15

ECHS Risk Register

Q4 2018/19

REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press shift & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)					EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)					FURTHER ACTION REQUIRED	RISK OWNER		
					LIKE	LIHO	OD	IMPA	CT		RISK	RATI	NG	LIKE	LIHO			OD	IMPA
1	All	Failure to deliver ECHS Financial Strategy	<p>Cause(s):</p> <ul style="list-style-type: none"> - Continual reduction in Central Government funding - Demographic changes - Increased demand for services - Demand led statutory services (c. 80% of operations) which can be difficult to predict - Increasing cost volatility due to rise of complex, high cost families or placements requiring services. <p>Effect(s):</p> <ul style="list-style-type: none"> - Lower than anticipated levels of financial resource - Failure to achieve a balanced budget - Failure to secure economy, efficiency, and effectiveness of use of resources leading to a Qualified Independent Auditors' Report - Objectives of the service not met - Reputation is impacted - Wider goals of the Council are not achieved 	Financial		5		5		25	<ul style="list-style-type: none"> - Budget monitoring and forecasting - Regular review of medium term strategy - Regular reporting to DLT and Members via the Committee reporting process - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - Monitor demographics, economic indicators and develop insight into future demand - Match financial planning to Council priorities - Internal audit framework - Early intervention with service users - Constantly reviewing service operations for potential efficiencies - Developed a series of commissioning plans, with mitigating actions, for Children's Social Care, Adult Social Care (Mental Health, Learning Disabilities and Older People) and SEND including mitigating actions addressing financial pressures - Growth and mitigation discussions - Service strategies in place to mitigate growth 		4		5		20	<ul style="list-style-type: none"> - Plans covering 10 projects in Children's Social Care went to the Corporate Commissioning Board in September 2018 outlining savings proposals to be implemented. - Plans are in place in Children's Social Care for improving sufficiency whilst reducing identified areas of budget. - Developing Housing Strategy. - Housing Transformation Board to increase rate and pace of affordable housing supply with updates to Members in May 19 for approval for first round of schemes. - Delivering commissioning actions in Transformation Board programme for ASC. 	ECHS DLT Gillian Palmer, Janet Bailey, Sara Bowrey, Naheed Chaudhry, Paul Feven, Kim Carey, Nada Lemic, Jared Nehra.
2	Adult Social Care	Failure to deliver effective Adult Social Care services The Council is unable to deliver an effective adult social care service to fulfil its statutory obligations including the safeguarding of Adults	<p>Cause(s):</p> <ul style="list-style-type: none"> - Increasing demand - Above compounded by associated longer waiting lists leading to deteriorating condition and ultimately increased service user/ carer costs - Failure to deliver effective safeguarding arrangements - Failure to comply with statutory requirements including the Care Act - Potential instability in social care workforce <p>Effect(s):</p> <ul style="list-style-type: none"> - Impact on life chances and outcomes for service users - Failure to keep vulnerable adults safe from harm or abuse 	Legal, Reputational		4		4		16	<p>Care Act - Redesigned processes, including amending forms, and operational procedures in place and Care Act compliance training</p> <p>Improved Better Care Fund - Programme overseen by the Interim Director of Programmes and the CCG</p> <p>Safeguarding - 1. Multi Agency Bromley Adult Safeguarding Board (BSAB) in place. 2. BSAB Training programme (E Learning and Face to Face). 3. Awareness training for vulnerable groups. 4. Care Act compliance training</p> <p>Recruitment - Dedicated HR programme of support in place to recruit social workers to front line posts</p> <p>Performance Monitoring Framework - Review of Performance Management Indicators</p> <p>Procurement and Contract Monitoring - Effective procurement framework and contract monitoring arrangements to ensure acceptable quality of service provision and value for money</p>		3		4		12	<ul style="list-style-type: none"> - Actions as part of LBB's Transformation Plan 	Director, Adult Social Care (Kim Carey)
2a	Learning Disability Service	Failure to deliver effective Learning Disability services Failure to assess service users, establish eligibility criteria and carry out the review process.	<p>Cause(s):</p> <ul style="list-style-type: none"> - Failure to identify and meet service users' needs - Provision of service to ineligible clients - Provision of service prior to/without appropriate authorisation - Failure to manage the transition process of service users from Children's Services to Adult Services leading to increased risk of Judicial Review - Potential instability in social care workforce <p>Effect(s):</p> <ul style="list-style-type: none"> - Costs associated with Legal process - Ongoing care package costs as a result of Legal process outcome - Placement predictions leading to financial pressures (cross refer ECHS Budget risk) 	Legal, Reputational		4		4		16	<ul style="list-style-type: none"> - Close monitoring of placements and eligibility criteria - Budget monitoring and forecasting - Regular review of medium term strategy - Regular reporting to DLT and Care Services PDS - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - Hold provider to account for poor performance - Monitor demographics, economic indicators and develop insight into future demand 		4		4		16	<ul style="list-style-type: none"> - LD Strategy in development - Actions as part of LBB's Transformation Plan 	Director, Adult Social Care (Kim Carey)
3	All Children's Social Care and Safeguarding Sections	Failure to deliver effective Children's services The Council is unable to deliver an effective children's service to fulfil its statutory obligations in safeguarding and protect those at risk of significant harm or death, sexual exploitation or missing from care	<p>Cause(s):</p> <ul style="list-style-type: none"> - Local authority response to Bromley Safeguarding Children's Board following Wood Review. <p>Effect(s):</p> <ul style="list-style-type: none"> - Impact on life chances and outcomes for children 	Legal, Reputational		3		5		15	<ul style="list-style-type: none"> - Multi Agency Bromley Children's Safeguarding Board (BCSB) Training programme 2019 to be set. - Dedicated HR programme of support in place to recruit social workers to front line posts - Scrutiny of Performance Management Framework and Indicators - Effective procurement framework and contract monitoring arrangements to ensure acceptable quality of service provision and value for money - under review - Quality Assurance Audit Programme Phase 3 - Children's Service Practice Improvement Board to commence April 2019 to deliver Ofsted and local authority recommendations. - Continued reduction of caseloads & within Caseload Promise on average - Identified training plan for qualified social workers and other professionals reviewed and updated quarterly 		3		4		12	<ul style="list-style-type: none"> - Ofsted validation - report published 7 January 2019 and action plan agreed - Phase 3 - 'to excellence' plan in development 	Director, Children's Services (Janet Bailey)

ECHS Risk Register

Q4 2018/19

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					LIKE	LIHO	OD	IMPA	CT		RISK	RATI	NG	LIKE	LIHO			OD	IMPA
4a	Children's Social Care	Recruitment and Retention - CSC Failure to recruit and retain key skilled staff with suitable experience/qualifications	Cause(s): - Failure to compete with other organisations to recruit the highest quality candidates to build an agile workforce - Small pool of experienced children's Social Workers Effect(s): - Failure to identify and meet service user needs - Provision of service to ineligible clients - Provision of service prior to/without appropriate authorisation - Lack of skill set results in an inability to deliver effective children's services to fulfil statutory safeguarding obligations, impacting on life chances and outcomes	Personnel		5		4		20	- Dedicated HR role to support managers in recruiting social workers to front line posts - Joint meetings held between HR and employment agencies to improve the quality and speed of locum assignments - Review of the current Recruitment and Retention package through Recruitment and Retention Board - Recruitment drive to convert locums to permanent staff - Commissioning of improvements to the Council's recruitment web site to include a video virtual tour of the Council - Support in effectively managing staff performance - Provision of training measures to include targeted leadership and management training programmes including partners and other stakeholders - Tailored individual career plan for staff - Launch of Social Work Academy in April 2019. - Bespoke training for first line managers on-going with cohort 2 - Training and quality assurance of practice		3		4		12		Director, Children's Services (Janet Bailey) Director, Human Resources (Charles Obazuaye)
4b	Adult Social Care	Recruitment and Retention - ASC Failure to recruit and retain key skilled staff with suitable experience/qualifications	Cause(s): - Failure to compete with other organisations to recruit the highest quality candidates to build an agile workforce - Small pool of experienced adult's Social Workers Effect(s): - Failure to identify and meet service user needs - Provision of service to ineligible clients - Provision of service prior to/without appropriate authorisation - Lack of skill set results in an inability to deliver effective adults' services to fulfil statutory safeguarding obligations, impacting on life chances and outcomes	Personnel		5		4		20	- Joint meetings held between HR and employment agencies to improve the quality and speed of locum assignments - Review of the current Recruitment and Retention package through Recruitment and Retention Board - Recruitment drive to convert locums to permanent staff - Commissioning of improvements to the Council's recruitment web site to include a video virtual tour of the Council - Support in effectively managing staff performance - Provision of training measures to include targeted leadership and management training programmes including partners and other stakeholders - Tailored individual career plan for staff - Bespoke training for first line managers - Training and quality assurance of practice - Dedicated HR worker to focus on Adult Social Care recruitment		3		4		12		Director, Adult Social Care Services (Kim Carey) Director, Human Resources (Charles Obazuaye)
4c	Housing Needs	Recruitment and Retention - Housing Failure to recruit and retain key skilled staff with suitable experience/qualifications	Cause(s): - Failure to compete with other organisations to recruit the highest quality candidates to build an agile workforce - Small pool of experienced workers Effect(s): - Failure to identify and meet service user needs - Provision of service to ineligible clients - Provision of service prior to/without appropriate authorisation - Lack of skill set results in an inability to deliver effective housing services, impacting on life chances and outcomes	Personnel		5		4		20	- Recruitment drive to convert locums to permanent staff - Council's recruitment web site includes a video virtual tour of the Council in housing - Support in effectively managing staff performance - Bespoke training for first line managers - Training and quality assurance of practice - Role on Recruitment and Retention Board - Review the recruitment/retention of housing staff including packages for retaining staff		3		4		12	- Benchmarking of gradings and role responsibilities for key posts - Developing recruitment and retention package with dedicated support from HR	Director, Housing (Sara Bowrey) Director, Human Resources (Charles Obazuaye)
5	Housing Needs	Failure to deliver effective Housing Needs services The Council is unable to deliver an effective Housing Needs service to fulfil its statutory obligations	Cause(s): - very demand led - lack of trained staff - homelessness is increasing number and complexity of cases Effect(s): - Impact on life chances and outcomes for individuals and families in need of Housing Services - Reputational damage - Legal challenge	Legal		4		4		16	- Focus on preventing homelessness and diversion to alternative housing options through:- - Landlord and Tenancy advice support and sustainment - Assistance (including financial aid) to access the private rented sector - Access to employment and training - Debt, money, budgeting and welfare benefits advice, including assistance to resolve rent and mortgage arrears - Sanctuary scheme for the protection of victims of domestic violence - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - Implementation of the More Homes Bromley initiative to ensure the supply reduces the reliance on nightly paid accommodation - Implementing the Homelessness Strategy - setting up the multi-agency Homelessness Forum and taking forward the priorities of the Strategy - New incentive campaign for private sector landlords embedded and benefits being realised.		2		4		8	- Housing Transformation Board programme being implemented. Report to Members in May 19. - Continue to develop partnership working with private sector landlords to assist households to remain in private sector accommodation - Work innovatively with a range of providers to increase access to a supply of affordable accommodation - Monitoring impact of implementation of Homelessness Reduction Act - Housing Strategy drafted	Director, Housing (Sara Bowrey)

ECHS Risk Register

Q4 2018/19

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5a	Housing Needs	Temporary Accommodation Inability to effectively manage the volume of people presenting themselves as homeless and the additional pressures placed on the homelessness budgets	Causes: - changes in government funding - rising number of placements (approx. 20 per month) Effect(s): - Failure to fulfil statutory obligations - Impact on life chances and outcomes for individuals and families in temporary accommodation - Increased risk of legal challenge due to provision of unsuitable accommodation (including shared accommodation) - Pressure on other services	Social		5		4		20			4		4		16		- Housing Transformation Board progressing projects to increase cost-effective temporary accommodation and affordable housing supply. Member approval to be sought in May 2019. - Transformation Board action plan in place for next 3-4 years. - Continue to develop partnership working with private sector landlords to assist households to remain in private sector accommodation - Work innovatively with a range of providers to increase access to a supply of affordable accommodation - Implement Intake and Early Intervention service to meet Homelessness Reduction Act - Complete tender process for modular homes supplier for temporary accommodation	Director, Housing (Sara Bowrey)	
5b	Housing Needs (Housing Strategy)	Capital Grant Failure to deliver the Council's affordable housing strategy in support of statutory obligations Lack of infrastructure in place where growth is occurring (Section 106 monies)	Cause(s): - Lack of availability of external capital grant (Housing Associations) to deliver key housing schemes - Lack of available suitable sites within the borough on which to develop new affordable housing schemes over the short to medium term - Potential fluctuations in house prices and supply chains Effect(s): - An inadequate supply of housing will lead to an inability to meet housing needs of a range of client groups in support of statutory housing and homelessness duties.	Social		4		4		16			3		4		12		- Additional measures will be explored once the Housing Strategy is developed. - Seeking to increase capacity for housing development support to ensure Housing Associations are supported and encouraged to develop affordable homes and that planning is aligned to the Local Plan. - Using Development Group to work with Housing Associations to encourage increased affordable housing development.	Director, Housing (Sara Bowrey)	
6	Public Health	Inability to deliver an effective Public Health service The Council is unable to deliver an effective Public Health service to fulfil its statutory obligations	Cause(s): - Reduced budget which has led to funding cuts, reduced service and redundancies. Withdrawal of non-statutory services. - Potential fluctuating medicines market Effect(s): - Increased clinical risk to patients and Bromley residents - Reputational risk to council - Gaps and potential blocks in health service between NHS and Local Authority	Professional, Legal, Reputational		4		4		16			3		4		12		Plans for further integration of some functions and services with CCG	Director, Public Health (Nada Lemic)	
7	All ECHS Divisions	Business Interruption / Emergency Planning Failure to provide Council services or statutory requirements of mass illness/fatalities scenario following a business interruption or emergency planning event	Cause(s): - Business Interruption could be caused by Loss of Facility (fire, flood etc.), Staff (illness, strike) or IT (cyber attack). - Mass fatalities or illness has a range of causes and this risk to the council could be caused by council staff being impacted resulting in failure to manage statutory requirements of mass illness/fatalities scenario (e.g. registering of deaths within timescales) Effect(s): - Business interruption - failure to deliver services, loss of customer / resident satisfaction. - Emergency planning - failure to deliver statutory duties.	Personnel, Reputational		2		5		10			1		5		5		Business Interruption - Civil protection and emergency planning policies in place at corporate level overseen by the Corporate Risk Management Group - Business Continuity Plans in place at service level - Contracts contain business continuity provision - Communication to all staff prior to all impending industrial action, informing of any possible service disruption as well as explaining implications of strike action for individual staff members Emergency Planning - Robust plans in place, including Outbreak Plan, Flu Plan and Pandemic Flu Plan - Alert system via the South East London Health Protection Unit (SEL HPU) - Annual Flu vaccination programme in place - Introduction of Humanitarian and Lead Officer (HALO) role	- Business Continuity Plans being reviewed and updated.	ECHS DLT

ECHS Risk Register

Q4 2018/19

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8	All ECHS Divisions	Contracts and Service Level Agreements Failure to effectively procure and/or manage key contractors or partners, leading to the department being unable to deliver key services, including attracting appropriate contractors or partners to deliver services	Cause(s): - Failure of provider - Provider withdrawing from the contract Effect(s): - Failure to deliver required quality/quantity/value for money services	Contractual, Partnership		4		1		4	- Timely and effective procurement process - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - Business Continuity plans - Contracts Sub-Committee established (a sub-committee of the Executive and Resources PDS Committee which considers a range of contracts issues including legal requirements, contract clauses and contract management to ensure value for money). - Traffic light system in use to assess the current status of each procurement project, as part of the Corporate Contract Management System) and any projects with a red status are tracked and reported to fortnightly divisional management team meetings - Commissioners and Procurement and Contract Compliance staff implement recovery plans for projects with red status alerts in order to mitigate all risks and to ensure that the department operates within financial regulations		3		1		3	- Ensuring appropriate adjustment of prices following introduction of the National Living Wage	ECHS DLT
9	Education	School Place Planning Failure to meet the statutory requirement to ensure sufficient school places to meet the needs of the population in the area	Cause(s): - Failure to secure sufficient Primary and Secondary school places in the area - Failure to secure sufficient educational placements for children with disabilities and special educational needs - Failure to secure sufficient alternative provision Effect(s): - Disruption to the education of children and impact on their life chances	Political, Legal, Professional		3		4		12	- Strategic needs analysis (birth rate, dwelling stock and migration) to project demand - Review analysis of demand annually - SEN sufficiency strategy will inform long term planning of specialist provision - Implement Basic Need programmes - Maintain relationships with DIE ESFA to support delivery of Free School and PSBP programmes - Monitor contractor performance in uncertain market		2		4		8	- Keep under review the provision of places for September 2019 at Bullers Wood School for Boys	Director, Education (Jared Nehra)
10	Children's Social Care	Not in Education, Employment or Training (NEET) Failure to meet requirements of Education, Care and Skills Act 2008 - duty on all young people to participate in Education, Employment or Training until their 18th birthday	Cause(s): - Lack of control over Academies Effect(s): - Disruption to Education - Impact on life chances for young people	Professional, Legal		3		2		6	- Provision offered by Bromley Youth Support Programme (BYSP) - Advice and Guidance Drop in sessions - One to one support - Looked After Children NEET support - YOT NEET support - Provision offered by Bromley Education Business Partnership (BEBP) - Bromley Youth Employment Scheme (YES) - Bromley Flexible Learning programme - Mentoring programme - Skills Xtra - Work experience and apprenticeships for Children Looked After - Tracking service in conjunction with South London CCIS Service - 'Door knocking' - Additional NEET worker started, based in Leaving Care service - a 4 year pilot programme, in partnership with Lewisham and Greenwich, providing support for care leavers most at risk of NEET.		3		2		6		Director, Children's Services (Janet Bailey)
11	Education/Adult Social Care/Programmes	Transport - School and Adult Social Care Failure to provide appropriate home to school transport assistance for children and young people with special educational needs and disabilities and home to day activities for vulnerable adults	Cause(s): - Fluctuating demand year on year - Rising numbers of children meeting criteria for transport provision and associated increase in costs - Interim transport service arrangements for adults currently uncertain Effect(s): - Disruption to education - Impact on life chances and outcomes for children and young people - Impact on outcomes for vulnerable adults	Legal Financial		5		3		15	- Budget monitoring and forecasting - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - Travel Training Programme - Route review and rationalisation - Gateway review to improve efficiency - Options for adult transport being explored to cover period from Sept 2019 to August 2020		3		3		9	- Review of policy - Gateway review for adult and children's re-commissioning of transport services from September 2020 to be considered by Executive in July 2019	Director, Education (Jared Nehra) Director, Adult Social Care (Kim Carey) Director, Programmes (Paul Feven)
12	Education	SEND Reforms Failure to meet expectation of SEND reforms	Cause(s): - Ineffective and inaccurate identification of SEND - Failure of schools to make reasonable adjustments to meet needs of individual children and young people - Failure to provide appropriate and effective support for children with identified needs and their schools - Pattern of provision which does not meet the needs of the local population resulting in placements in independent schools Effect(s): - Costs associated with the Legal process - Escalating cost of provision - Impact on education and life chances of children and young people	Financial Legal Professional		4		4		16	- SEND4Change completed a root and branch review of Bromley's response to SEND reforms - An Improvement Plan agreed for 2018/19 - Transfer of statements to EHC Plans completed March 2018 - SEN service realigned to improve decision making and management oversight - SEN Inspection Readiness team established with ongoing review and scrutiny - SEN Advisory Teams realigned to maximise resource and fill gaps in support with a specific focus on CYP with EHCPs in mainstream provision - Joint Commissioning arrangements established across a number of key services - Service Level Agreements being established with mainstream settings with additionally resourced provisions to provide clarity across both parties		3		4		12	- Readiness for SEND inspection monitored - QA programme for placements in independent schools to be implemented - Local Offer Development Officer being recruited to strengthen and promote the Local Offer - ASD Joint Strategy in development - Engagement framework in final stages - CYP Participation Officer post extended with workplan agreed - CAMHS trailblazer project to be implemented - Bromley Teaching Schools leading SEN training collaborative to support school improvement. - Placement planning framework in development for September 2020 and beyond - Legal advice to be drawn in to support complex tribunal cases	Director, Education (Jared Nehra)

ECHS Risk Register

Q4 2018/19

REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press shift & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)					EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)					FURTHER ACTION REQUIRED	RISK OWNER
					LIKE	LIHO	OD	IMPA	CT		RISK	RATI	NG	LIKE	LIHO		
14	Children's Social Care	Youth Offending Failure to deliver effective youth offending services to protect children and young people and reduce their vulnerability	Cause(s): - Increase in youth offending Effect(s): - Impact on life chances and outcomes for children - Failure to protect the public and actual or potential victims (assessment of risk to others and planning to manage the risk and protect the public)	Professional Reputational			3	4	12	- Learning from the Youth Justice follow up Inspection of February 2017. Action plan developed, fortnightly Improvement Board implemented to ensure action plan carried out. - Improved inspection result - Good in 2017 - Implementation of Strategic Plan 2017/19 - Youth Justice Board self-assessment audit of National Standards - 2 moderation exercises carried out and YJB assured that this reflected service standards - Bi-monthly audits with quality assurance check by SIT Team - Monthly YOS performance meeting to review national KPIs, act upon trends and drive improvement plan - Triage support to divert low level offenders from YJS - Packages of support to manage young people's risk appropriately in the community for those who are sent to custody. - YOS Partnership Improvement Board is overseeing the Improvement Plan - YOS Inspection preparation by all partners.			2	4	8		Director, Children's Services (Janet Bailey)
15	Children's Social Care	Out of Borough Placements (Children and Young People) Inability to reduce reliance on out of borough placements Financial implications	Cause(s): - Failure to provide/commission sufficient local placements for children with disabilities and children in care Effect(s): - Cost implications of out of borough placements (Cross refer ECHS Budget risk) - Impact for children's welfare and development	Professional Financial			3	3	9	- Close monitoring of placements and eligibility criteria - Budget monitoring and forecasting - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - Monitor demographics, economic indicators and develop insight into future demand - Out of borough officer in Placements Team reviewing OOB placements and those placed in Bromley from other authorities			3	3	9	- Carrying out a review of how to move this forward. - Review of children's residential, IFA and semi-supported 16+ market in borough and discussions with Bromley providers to increase our ability to place with them.	Director, Children's Services (Janet Bailey) Director, Programmes (Paul Feven)
18	Housing Needs	Welfare Reform Impact of Welfare Reform legislation (including Universal Credit).	Cause(s): - Universal Credit payments commenced on 18th January 2016 in Bromley for single people only. From this time, there is no separate Housing. - Benefit payment direct to the Landlord - Further roll out planned for 2018 which will increase the impact of this reform Effect(s): - Increased Rent Arrears - Subsequent evictions and landlords reluctant to rent properties to claimants.	Social			4	4	16	- Notification, advice and support provided through:- - Housing Association transfers - Negotiations with landlords - Budgeting/debt advice - Moves to cheaper areas - Prevention grants/welfare fund/Credit union loans and savings - Access to child care and employment - Awareness raising campaign for Universal Credit Digital rollout and monitor impact from July 2018. Structures to support changes reviewed and money advice support extended.			3	3	9	- Work in partnership with Housing Benefit, the DWP, partner landlords and Social Care to minimise the impact of the Welfare Reform Act - Setting up working group with Housing Associations to explore additional measures to support residents with the rollout of Universal Credit - CAB Universal Credit advice service goes live in April 2019. Close working with CAB to ensure identification and support to those at risk.	Director, Housing (Sara Bowrey)
19	Adult Social Care	Deprivation of Liberty Failure to prevent unlawful deprivation of liberty	Cause(s): - Risk increased due to change in legislation increasing scope. - Any claim by service user with a community package of care if DoL not in place Effect(s): - Failure to comply with statutory requirements pursuant to Section 4 (Section 4A) and paras 129, 180 and 182 of Schedule A (Schedule A1) of the Mental Capacity Act 2005 (as amended to incorporate the Deprivation of Liberty Safeguards 2009)	Legal			4	4	16	- Core administrative function maintained - Framework in place to deliver the functions of the Best Interest Assessor and the 'Section 12' Doctor - Rolling out training for all social workers to become Best Interest Assessors - will be reviewed in light of future change in legislation - Scoping of potential deprivation of liberty cases in the community completed on CareFirst and cases prioritised accordingly			2	4	8		Director, Adult Social Care (Kim Carey)
20	Strategy, Performance and Engagement	Data Collections Failure to undertake statutory statistical data collections; including pupil census, attainment data and key adults' and children's social care information, thereby adversely affecting government grant allocations and performance assessments	Cause(s): - Business Interruption Effect(s): - Failure to commission effectively - Adverse impact on the timing and quality of decision making	Data and Information			3	3	9	- Schedule of statutory returns has been incorporated into the Performance and Information team's work programme - Specialist members of the team for each area - Other staff trained to provide 'back up' for specialist members of the team - Good project planning in place to co-ordinate all data collections including contributions from other services			1	3	3		Assistant Director, Strategy, Performance and Engagement (Naheed Chaudhry)

Risk Assessment Guidance

Likelihood	Almost Certain (5)	5	10	15	20	25	<table border="1" style="display: inline-table; vertical-align: middle;"> <tr><td style="background-color: red;">15+</td></tr> <tr><td style="background-color: orange;">10 - 12</td></tr> <tr><td style="background-color: yellow;">5 - 9</td></tr> <tr><td style="background-color: green;">1 - 4</td></tr> </table>	15+	10 - 12	5 - 9	1 - 4	<p>High Risk - review controls and actions every month</p> <p>Significant Risk - review controls and actions every 3 months</p> <p>Medium Risk - review controls and actions every 6 months</p> <p>Low Risk - review controls and actions at least annually</p>
	15+											
	10 - 12											
	5 - 9											
	1 - 4											
Highly likely (4)	4	8	12	16	20							
Likely (3)	3	6	9	12	15							
Unlikely (2)	2	4	6	8	10							
Remote (1)	1	2	3	4	5							
		Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)		Impact				

Risk Likelihood Key					
	Score - 1	Score - 2	Score - 3	Score - 4	Score - 5
	Remote	Unlikely	Possible	Likely	Definite
Expected frequency	10 - yearly	3 - yearly	Annually	Quarterly	Monthly

Risk Impact Key					
Risk Impact	Score - 1 Insignificant	Score - 2 Minor	Score - 3 Moderate	Score - 4 Major	Score - 5 Catastrophic
Compliance & Regulation	Minor breach of internal regulations, not reportable	Minor breach of external regulations, not reportable	Breach of internal regulations leading to disciplinary action Breach of external regulations, reportable	Significant breach of external regulations leading to intervention or sanctions	Major breach leading to suspension or discontinuation of business and services
Financial	Less than £50,000	Between £50,000 and £100,000	Between £100,000 and £1,000,000	Between £1,000,000 and £5,000,000	More than £5,000,000
Service Delivery	Disruption to one service for a period of 1 week or less	Disruption to one service for a period of 2 weeks	Loss of one service for between 2-4 weeks	Loss of one or more services for a period of 1 month or more	Permanent cessation of service(s)
Reputation	Complaints from individuals / small groups of residents Low local coverage	Complaints from local stakeholders Adverse local media coverage	Broader based general dissatisfaction with the running of the council Adverse national media coverage	Significant adverse national media coverage Resignation of Director(s)	Persistent adverse national media coverage Resignation / removal of CEX / elected Member
Health & Safety	Minor incident resulting in little harm	Minor Injury to Council employee or someone in the Council's care	Serious Injury to Council employee or someone in the Council's care	Fatality to Council employee or someone in the Council's care	Multiple fatalities to Council employees or individuals in the Council's care

INSTANT GUIDE TO RISK MANAGEMENT

The Process	Identify your risks	Assess your risks	Control your risks	Monitor and Review your risks
<p>Risk Management is an important element of the system of internal control. It is based on a process designed to identify and prioritise risks to achieving Bromley's policies, aims and objectives.</p> <p>The Risk Management process is a continuous cycle:</p> <p>Using your objectives Identify your risks> Assess your risks > Control your risks> Monitor and Review your risks.</p> <p>Useful definitions:</p> <p>Risk Management is the identification, analysis and overall control of those risks which can impact on the Council's ability to deliver its priorities and objectives.</p> <p>Risk is the chance of something happening which will have an impact on objectives.</p> <p>The message is that if you don't manage your risks then you are unlikely to achieve your objectives</p>	<p>Brainstorming session using IE&E plans and departmental objectives, to identify threats and opportunities.</p> <p>Useful analytical tools:</p> <p>Political Economic Social Technological Legal Environmental</p> <p>PESTLE provides a simple and useful framework for identifying and analysing external factors which may have an impact on your service.</p> <p>Strengths Weaknesses Opportunities Threats</p> <p>Using the PESTLE output SWOT is a technique that can help a service to focus on areas for improvement and opportunities that could be pursued.</p> <p>Remember if it can go wrong it will go wrong.</p>	<p>We use a 5 x 5 matrix to assess risks (see Risk Assessment Guidance tab).</p> <p>Risk is scored using a traffic light system:</p> <p>Red = High Amber = Significant Yellow = Medium Green = Low</p> <p>There are two risk variables that make up the overall risk rating:</p> <p>Impact – how minor / severe is it when it happens?</p> <p>Likelihood – how likely is it / how often does it happen?</p> <p>The Risk Management Toolkit provides detailed guidance on how to score these.</p> <p>Some of these assessments can be based on past experience. In other cases you will need to take a view.</p> <p>We measure both gross risk (before any controls are taken into account) and net or residual risk.</p>	<p>Consider the controls you have in place to mitigate or reduce the risk.</p> <p>What further controls are required? Record these as actions until they are completed.</p> <p>Consider the cost of any controls against the potential benefit gained.</p> <p>What is our Risk Appetite? An element of risk is unavoidable or we would never do anything!</p> <p>AVOID a risk – stop doing the activity</p> <p>REDUCE a risk – put additional controls in place</p> <p>TRANSFER a risk – by insuring or passing the risk to a third party</p> <p>TAKE a risk – monitor to ensure the impact and likelihood do not change</p> <p>Risk of service failure can be minimised by ensuring effective Business Continuity Plans are in place. For guidance contact Laurie Grasty x4764..</p>	<p>Risks should be reviewed at least annually and whenever your business plans change.</p> <p>Remember risks evolve and change over time. Are the controls still effective?</p> <p>Your aim should be to:</p> <p>Manage threats that may hinder delivery of priorities and maximise opportunities that will help to deliver them.</p> <p>The Bromley Risk Register is maintained centrally by Audit and includes details of the risks, risk owners, controls and actions. Contact James Newell x4842.</p> <p>Further guidance on Risk Management can be found in the Managers' Toolkit on onebromley. This also provides links to the Risk Management Strategy, Risk Management Toolkit and Risk Register.</p> <p>The site also provides a link to the Health and Safety Unit who carry out H&S risk assessments. For guidance contact the Corporate Safety Advisor Charlotte Faint x7584.</p>

ECHS Risk Register

Q2 2018/19

REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press shift & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)				EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)				FURTHER ACTION REQUIRED	RISK OWNER
					LIKE LIHO OD	IMPA CT	RISK RATI NG	LIKE LIHO OD		IMPA CT	RISK RATI NG				
13	Education	School Standards Failure to meet duty to promote educational achievement of all children	Cause(s): - Abdication of responsibility for outcomes for all children - Failure to use available intelligence to recognise when schools are letting children down - Failure to intervene effectively when schools let children down Effect(s): Impact on life chances and outcomes for children and young people	Political Legal Professional Reputational	1	4	4	- Improve collation and analysis of information about performance of schools and outcomes for children - Establish pathways to challenge and support school improvement and outcomes for children - Maximise every contact with schools to balance lack of school improvement and resources - Relationship with teaching schools to support school improvement	1	3	3		Director, Education (Gillian Palmer)		
16	Children's Social Care	Foster Carers Failure to meet the statutory requirement to ensure sufficient local placements to satisfy need	Cause(s): - Failure to recruit sufficient carers, particularly for adolescents, siblings, disabled children, parent and child placements, and BME children Effect(s): - Lack of suitable carers from independent foster care sources leading to the arrangement of more expensive alternatives - Impact on life chances and outcomes for children	Professional	4	2	8	- Reviewed and refreshed recruitment strategy - dedicated fostering recruitment officer appointed - Reviewed and refreshed Fostering web pages including rebranding and improved navigation - Carried out two borough wide leaflet distributions, via council tax information and environmental information - Publicity on buses and petrol station pumps - Appointed 26 new foster carers between July 17 - February 2018 - Awarded first Kite Mark in country for fostering - Monthly drop in sessions being held closer to foster carer homes within Children and Family Centres - Support to SGO carers provided in C&F Centres - Out of hours fostering support commenced in July 2018 - Coram psychologist accessible to carers 2 days a week - Support for grandparents and other family members who are providing full time care through Grandparents Plus - Joint training of social work professionals and foster carers - Head of Service attending Fostering Network Groups - Fostering and Adoption Panels merged in January 2018	3	2	6	- Head of Service to lead on the development of improved support and training packages for Foster carers to enable them to Care for children and young people with complex needs and/or challenging behaviour	Director, Children's Services (Janet Bailey)		
17	Housing Needs	Care Leavers' accommodation Failure to provide a sufficient range of safe and suitable housing for care leavers	Cause(s): - Failure to appropriately risk assess housing provision offered to care leavers Effect(s): - Impact on life chances and outcomes for Care Leavers	Legal	3	3	9	- Review of all young people in B&B accommodation (post 18 years) undertaken - no young people housed in B&B. - Pathway plans updated to ensure appropriate support provided in relation to health and education needs. - Full strategic needs assessment of Bromley's young people's accommodation needs funded by DCLG commissioned from St Basils (a specialist service in young people's housing) to inform future decision making and help streamline the housing pathway. - BIS team to work closely with colleagues in the Housing Teams (S&R and Allocations) to review the housing pathway for care leavers and to identify suitable accommodation options for care leavers. - Homelessness strategy reviewed, including the priority of housing all young people. - Develop a policy for vulnerable homeless and care leavers as part of the homelessness strategy, outlining the housing pathways, all placement options and alternatives to bed and breakfast accommodation. - Develop and implement a risk assessment framework for care leavers to be used before any placement in new accommodation. - Amend the wider housing policy to ensure it aligns to the new care leaver placement strategy - The BIS Team to adopt the risk assessment tool in practice to ensure that all accommodation to be provided to care leavers is assessed for its suitability, as a safe and secure base, prior to the placement being commissioned.	2	3	6	- A Gateway report will go to Committee in October for tendering the Care Leavers Accommodation Service	Director, Housing (Sara Bowrey) Director, Children's Services (Janet Bailey)		

London Borough of Bromley

PART 1 - PUBLIC

Briefing for Care PDS

25th June 2019

OUTCOME OF SHARED LIVES INSPECTION

Contact Officer: Adesina Suleiman, Direct Services Manager

Tel: 02083134408 E-mail: Adesina.Suleiman@Bromley.Gov.Uk

Chief Officer: Kim Carey

1. Summary

1.1 The last Care Quality Commission inspection of the Bromley Shared Lives Service took place in January 2019. The final report was published on 4th March 2019. At this inspection CQC found the service had made further progress in some areas when compared to the previous inspection in 2016 and that the evidence continued to support the overall rating of 'Good'.

2. **THE BRIEFING**

2.1 The CQC was very complementary in describing four out of the five inspected questions as Good and the service remains rated Good overall. CQC confirmed in the report that there was no evidence or information from the inspection and ongoing monitoring that demonstrated serious risks or concerns.

However, the CQC inspection found some improvement was needed in the key question safe due to the need to improve on the existing medication management policy. A Carer was found to have left medicines on the fridge, when the medication policy states they should be locked away in a cupboard. Another carer was not recording the respite service user's medication on MAR sheets as they should. In addition, the Inspector found that the relevant Adult's Epilepsy and Diabetic health plans and smoking risk assessment where relevant were not found together in one place as they should.

The CQC recommendation was that the Shared Lives service makes the necessary changes to the medication policy to ensure carers are aware of their responsibility to lock medicines away. The relevant health plans and risk assessment must be completed and made easily available. The Registered Manager had started to take necessary actions to address the identified areas for improvement from the time of the inspection.

The existing medication policy has been reviewed and updated to explicitly state where medication must be stored and the requirement to sign for all medication given by Carers including PRN. The service will also work on developing an easy read version of the policy that will be more suitable for the service user group.

Service user smoking risk assessments of all the relevant 3 relevant people (2 who smoke and who vape) have started and will be fully completed at the next monitoring visit to the Placements.

The Black Books (Personal Health Profile) have been delivered to the service and are being distributed to carers during monitoring visits. Placement Officers are working with Carers and Service users throughout our monitoring visits on improving capacity in making good, positive use of the Black Books. We will also be holding a forum in late summer / early autumn on how to complete and use the Black Book in recording all the relevant Health Action Plans.

Completing all the above tasks will be the Shared Lives response for improvement to our recent CQC recommendation under Safe.