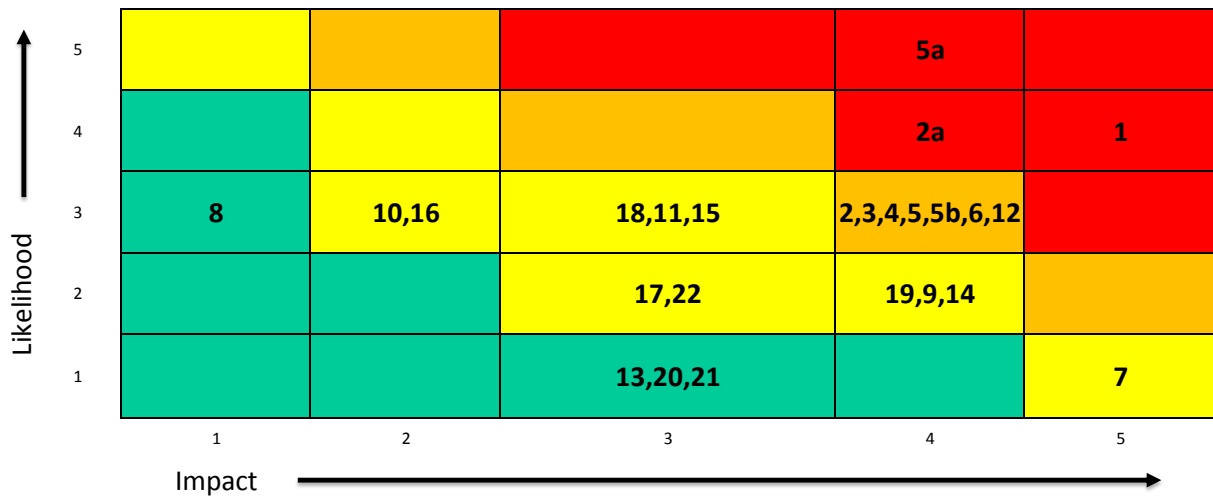


ECHS Risk Register



| 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 | 20 | 12 |
| 4 | Recruitment and Retention | 20 | 12 |
| 5 | Failure to deliver effective Housing Needs services | 16 | 12 |
| 5a | Temporary Accommodation | 20 | 20 |
| 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 | SEND Transport | 9 | 9 |
| 12 | SEND Reforms | 16 | 12 |
| 13 | School Standards | 4 | 3 |
| 14 | Youth Offending | 12 | 8 |
| 15 | Out of Borough Placements (Children and Young People) | 9 | 9 |
| 16 | Foster Carers | 8 | 6 |
| 17 | Care Leavers' accommodation | 9 | 6 |
| 18 | Welfare Reform | 12 | 9 |
| 19 | Deprivation of Liberty Safeguards | 12 | 8 |
| 20 | Data Collections | 9 | 3 |
| 21 | 30 hours funded childcare for three and four year olds of working parents | 6 | 3 |
| 22 | Failure to deliver partial implementation of Health & Social Care Integration | 6 | 6 |

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 | CATEGORY | GROSS RISK RATING (See next tab for guidance) | | | EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK | CURRENT RISK RATING (See next tab for guidance) | | | FURTHER ACTION REQUIRED | RISK OWNER |
|-----|-----------------------------|--|---|----------------------|--|--------|-------------|---|--|--------|-------------|--|--|
| | | | | | Likelihood | Impact | Risk Rating | | Likelihood | Impact | Risk Rating | | |
| | | | | | | | | | | | | | |
| 1 | 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 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. - Proposals for an increased supply of housing to mitigate the cost of temporary accommodation are being presented to RRH PDS for approval in November 2018. - Continue to monitor commissioning plans | ECHS DLT Ade Adetosoye, Janet Bailey, Sara Bowrey, Naheed Chaudhry, Paul Feven, Stephen John, Nada Lemic, Gillian Palmer. |
| 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 <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, Reputation al | 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 | | Director, Adult Social Care (Stephen John) |
| 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 <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, Reputation al | 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 | | Director, Adult Social Care (Stephen John) |

ECHS Risk Register

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| | | | | | LIKELIHOOD | IMPACT | RISK RATING | | LIKELIHOOD | IMPACT | RISK RATING | | |
| 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 | Cause(s): - Increasing demand - The Secretary of State could determine that the Council is failing to deliver its Children's Social Care services to an adequate standard and approve alternative delivery arrangements as the most effective way of securing and sustaining improvement. This arrangement could include the removal of service control from the authority. Effect(s): - Impact on life chances and outcomes for children | Legal, Reputational | 4 | 5 | 20 | - Multi Agency Bromley Children's Safeguarding Board (BCSB) in place and BCSB Training programme - Dedicated HR programme of support in place to recruit social workers to front line posts - Review 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 - Appointment of Deputy Chief Executive with Director of Children's Services responsibility (in post December 2016) - Appointment of Director, Children's Services (in post December 2016) - £950k available for immediate use to build capacity and £2.3m available on a recurring basis for Children's services - Quality Assurance Audit Programme Phase 2 - Children's Service Improvement Action Plan refocussed to ensure that Heads of Service and Group Managers are delivering the actions relevant to their teams - 15% of 306 actions outstanding. Phase 2 commenced 2018 - Key events and supporting material developed to ensure improving practice is at the heart of the organisation - Review of team structures completed - New process for authorising placements implemented - Continued reduction of caseloads & within Caseload Promise on average - Atlas Team reviewed and moved to MASH to improve safeguarding - Identified training plan for qualified social workers and other professionals reviewed and updated quarterly | 3 | 4 | 12 | Validation by Ofsted in forthcoming inspection. | Director, Children's Services (Janet Bailey) |
| 4 | All | Recruitment and Retention 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 Social Workers, particularly children's 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, children's and public health 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 - Repromotion and review of the current Recruitment and Retention package - Repromotion of the 'no quit' policy - 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 - Provision of regular monitoring information to feed into the corporate governance dashboard - Role on Recruitment and Retention Board - Dedicated HR worker to focus on Adult Social Care recruitment | 3 | 4 | 12 | - Review the recruitment/retention of housing and adult social care staff including packages for retaining staff | Director, Adult Social Care (Stephen John) Director, Children's Services (Janet Bailey) Director, Public Health (Nada Lemic) Director, Housing (Sara) |

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| | | | | | LIKELIHOOD | IMPACT | RISK RATING | | LIKELIHOOD | IMPACT | RISK RATING | | |
| 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 | <p>Cause(s):</p> <ul style="list-style-type: none"> - very demand led - lack of trained staff - homelessness is increasing number and complexity of cases <p>Effect(s):</p> <ul style="list-style-type: none"> - Impact on life chances and outcomes for individuals and families in need of Housing Services - Reputational damage - Legal challenge | Legal | 4 | 4 | 16 | <ul style="list-style-type: none"> - Focus on preventing homelessness and diversion to alternative housing options through:- - Landlord and Tenancy advice support and sustainment - Assistance (including financial aid) to access the private rented sector - Access to employment and training - Debt, money, budgeting and welfare benefits advice, including assistance to resolve rent and mortgage arrears - Sanctuary scheme for the protection of victims of domestic violence - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - 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 | 3 | 4 | 12 | <ul style="list-style-type: none"> - Seek new and alternative forms/supply of temporary accommodation - An options paper will be presented to Committee in November for the new supply of temporary and settled housing - Continue to develop partnership working with private sector landlords to assist households to remain in private sector accommodation - New incentive campaign for private sector landlords launched - Work innovatively with a range of providers to increase access to a supply of affordable accommodation - Monitoring impact of implementation of Homelessness Reduction Act | Director, Housing (Sara Bowrey) |
| 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 | <p>Causes:</p> <ul style="list-style-type: none"> - changes in government funding - rising number of placements (approx. 20 per month) <p>Effect(s):</p> <ul style="list-style-type: none"> - 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 | <ul style="list-style-type: none"> - Focus on preventing homelessness and diversion to alternative housing options through:- - Landlord and Tenancy advice support and sustainment - Assistance (including financial aid) to access the private rented sector - Access to employment and training - Debt, money, budgeting and welfare benefits advice, including assistance to resolve rent and mortgage arrears - Sanctuary scheme for the protection of victims of domestic violence - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - 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 | 5 | 4 | 20 | <ul style="list-style-type: none"> - Seek new and alternative forms/supply of temporary accommodation - An options paper will be presented to Committee in November for the new supply of temporary and settled housing - Continue to develop partnership working with private sector landlords to assist households to remain in private sector accommodation - New incentive campaign for private sector landlords - Work innovatively with a range of providers to increase access to a supply of affordable accommodation - Monitoring impact of implementation of Homelessness Reduction Act - Complete tender process for modular homes supplier for temporary accommodation | Director, Housing (Sara Bowrey) |

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| | | | | | LIKELIHOOD | IMPACT | RISK RATING | | LIKELIHOOD | IMPACT | RISK RATING | | |
| 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 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 | - Lead negotiations on the affordable housing provision on section 106 applications, ensuring that the affordable housing obligation reflects local adopted planning policy and local statutory and high priority housing need - Determination at planning stage to ensure collection of obligations due - Conditions attached to funding received to ensure it is spent on preventing homelessness | 3 | 4 | 12 | - Review of proposed legislation as it develops - An options paper for capital funding for development will be going to Committee in November. - Additional measures will be explored once the Housing Strategy is developed. | 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. 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 | - Working with partners including the CCG and Hospital Trust to jointly deliver Public Health functions and mitigate impact of cuts - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money | 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 | 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 | 1 | 5 | 5 | | ECHS DLT |
| 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 |

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| | | | | | LIKELIHOOD | IMPACT | RISK RATING | | LIKELIHOOD | IMPACT | RISK RATING | | |
| 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 and PSB programmes - Maintain relationships with ESFA | 2 | 4 | 8 | - Keep under review the provision of places for September 2019 at Bullers Wood School for Boys | Director, Education (Gillian Palmer) |
| 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 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 | SEND Transport Failure to provide appropriate home to school transport assistance for children and young people with special educational needs and disabilities | Cause(s): - Fluctuating demand year on year - Rising numbers of children meeting criteria for transport provision and associated increase in costs Effect(s): - Disruption to education - Impact on life chances and outcomes for children and young people | Legal Financial | 3 | 3 | 9 | - 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 | 3 | 3 | 9 | Review of policy | Director, Education (Gillian Palmer) |

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| | | | | | LIKELIHOOD | IMPACT | RISK RATING | | LIKELIHOOD | IMPACT | RISK RATING | | |
| 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 | 3 | 4 | 12 | - Readiness for SEND inspection monitored - QA programme for placements in independent schools to be implemented - Realignment of advisory teams in progress to increase capacity to support mainstream schools to meet a wider range of needs - Bromley Teaching Schools leading SEN training collaborative to support school improvement. | Director, Education (Gillian Palmer) |
| 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) |
| 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 | 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 - Regular review of medium term strategy - 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 - Tendering for 9 bedded unit to reduce OOB placements | 3 | 3 | 9 | - Carrying out a review of how to move this forward. - The feasibility for a 9 bedded unit to reduce OOB placements is being reviewed - following the lack of tenders being submitted, conversations are being held with individual providers. | Director, Children's Services (Janet Bailey) |

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| | | | | | LIKELIHOOD | IMPACT | RISK RATING | | LIKELIHOOD | IMPACT | RISK RATING | | |
| 16 | Children's Social Care | Foster Carers Failure to meet the statutory requirement to ensure sufficient local placements to satisfy need | <p>Cause(s):</p> <ul style="list-style-type: none"> - Failure to recruit sufficient carers, particularly for adolescents, siblings, disabled children, parent and child placements, and BME children <p>Effect(s):</p> <ul style="list-style-type: none"> - 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 | <ul style="list-style-type: none"> - 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 | <ul style="list-style-type: none"> - 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 | <p>Cause(s):</p> <ul style="list-style-type: none"> - Failure to appropriately risk assess housing provision offered to care leavers <p>Effect(s):</p> <ul style="list-style-type: none"> - Impact on life chances and outcomes for Care Leavers | Legal | 3 | 3 | 9 | <ul style="list-style-type: none"> - 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 | <ul style="list-style-type: none"> - A Gateway report will go to Committee in October for tendering the Care Leavers Accommodation Service | <p>Director, Housing (Sara Bowrey)</p> <p>Director, Children's Services (Janet Bailey)</p> |
| 18 | Housing Needs | Welfare Reform Impact of Welfare Reform legislation (including Universal Credit). | <p>Cause(s):</p> <ul style="list-style-type: none"> - 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 <p>Effect(s):</p> <ul style="list-style-type: none"> - Increased Rent Arrears - Subsequent evictions and landlords reluctant to rent properties to claimants. | Social | 4 | 3 | 12 | <ul style="list-style-type: none"> - 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 are in place and will be reviewed in autumn 2018. | 3 | 3 | 9 | <ul style="list-style-type: none"> - Work in partnership with Housing Benefit, the DWP, partner landlords and Social Care to minimise the impact of the Welfare Reform Act | Director, Housing (Sara Bowrey) |

ECHS Risk Register

| REF | DIVISION | RISK TITLE & DESCRIPTION (a line break - press shift & return - must be entered after the risk title) | RISK CAUSE & EFFECT | CATEGORY | GROSS RISK RATING (See next tab for guidance) | | | EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK | CURRENT RISK RATING (See next tab for guidance) | | | FURTHER ACTION REQUIRED | RISK OWNER |
|-----|---------------------------------------|--|--|---|--|--------|-------------|---|--|--------|-------------|---|--|
| | | | | | LIKELIHOOD | IMPACT | RISK RATING | | LIKELIHOOD | IMPACT | RISK RATING | | |
| 19 | Adult Social Care | Deprivation of Liberty Safeguards Failure to prevent unlawful deprivation of liberty | Cause(s): - Risk increased due to change in legislation increasing scope. Effect(s): - Failure to comply with statutory requirements pursuant to Section 4 and paras 129, 180 and 182 of Schedule A of the Mental Capacity Act 2005 (as amended to incorporate the Deprivation of Liberty Safeguards 2009) | Legal | 3 | 4 | 12 | - 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 - Reviewed IR 35 agreement to manage response to demand | 2 | 4 | 8 | -Awaiting outcome of legislative change | Director, Adult Social Care (Stephen John) |
| 20 | Strategic & Business Support Services | 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, Strategic and Business Support Services (Naheed Chaudhry) |
| 21 | Education | 30 hours funded childcare for three and four year olds of working parents The Council is unable to provide sufficient places within the local sector to fulfil its Statutory Duty | Cause(s): - Insufficient places within local sector resulting in Local Authority failure to meet its statutory duty - Inability to implement a suitable IT system which supports efficient and timely processing of funding claims Effect(s): - Parental dissatisfaction - Official notification from DfE regarding failure to fulfil statutory duty - Delays in payment to providers, destabilising local businesses. | Political, Reputational | 2 | 3 | 6 | - Work to stimulate the market is increasing capacity overall although some local pockets of pressure remain - Monitor eligibility, confirmations and take up of places to predict growth of demand - Work carried out with IT provider to ensure best fit IT solution within deadlines | 1 | 3 | 3 | | Director, Education (Gillian Palmer) |
| 22 | Programmes | Failure to deliver partial implementation of Health & Social Care Integration Plans are not in place to deliver partial integration by 2020 | Cause(s): - Difficulty in achieving rapid change in a system as complex as health and social care - Rising social care costs due to ageing population and people living longer with increasing complex needs - Difficulties with agreeing budgets (given likely funding reductions going forward), complex governance arrangements and workforce planning - Need to focus on collaborative working (cultural differences) - Pressure for social care services to be accessible 7 days a week in terms of our own workforce and contracts with external providers in line with NHS priority to deliver 7 day working across the health sector - LBB will need to contribute to a whole system review (led by BCCG) to ensure that funding follows the patient Effect(s): - Failure to deliver statutory duties - Failure to achieve our Building a Better Bromley priorities | Financial Reputational Compliance /Regulation | 2 | 3 | 6 | - A draft 2020 integration plan for health and social care integrated service delivery and commissioning across the borough was developed by May 2018 by ECHS/BCCG - Continued work with health partners to deliver the main transformation programmes eg Bromley Well and the transformation of prevention - Building on the work already delivered through S75 agreement with Oxleas and being implemented through the Better Care Fund workstreams eg Winter Resilience work, Transfer of Care Bureau, Integrated Care Records and Discharge to Assess - New governance structure between LBB and BCCG feeding into the Health and Wellbeing Board via the Integrated Commissioning Board (strategic) and Commissioning Network (operational) | 2 | 3 | 6 | | Director, Programmes (Paul Feven) Director, Integrated Commissioning- BCCG Graham Mackenzie |

Risk Assessment Guidance

| | | | | | | | | | | | | | | | |
|-------------------|----------------------|--|--------------|-----------|---------------------|---------------|---|-----|--|---------|--|-------|---|-------|---|
| Likelihood | Almost Certain (5) | 5 | 10 | 15 | 20 | 25 | <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="background-color: red; color: white; text-align: center;">15+</td> <td>High Risk - review controls and actions every month</td> </tr> <tr> <td style="background-color: orange; color: white; text-align: center;">10 - 12</td> <td>Significant Risk - review controls and actions every 3 months</td> </tr> <tr> <td style="background-color: yellow; color: black; text-align: center;">5 - 9</td> <td>Medium Risk - review controls and actions every 6 months</td> </tr> <tr> <td style="background-color: lightgreen; color: black; text-align: center;">1 - 4</td> <td>Low Risk - review controls and actions at least annually</td> </tr> </table> | 15+ | High Risk - review controls and actions every month | 10 - 12 | Significant Risk - review controls and actions every 3 months | 5 - 9 | Medium Risk - review controls and actions every 6 months | 1 - 4 | Low Risk - review controls and actions at least annually |
| | 15+ | High Risk - review controls and actions every month | | | | | | | | | | | | | |
| | 10 - 12 | Significant Risk - review controls and actions every 3 months | | | | | | | | | | | | | |
| | 5 - 9 | Medium Risk - review controls and actions every 6 months | | | | | | | | | | | | | |
| | 1 - 4 | Low Risk - review controls and actions at least annually | | | | | | | | | | | | | |
| 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 | Score - 2 | Score - 3 | Score - 4 | Score - 5 |
| | Insignificant | Minor | Moderate | Major | 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 |

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|--|--|--|---|---|
| <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> |
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