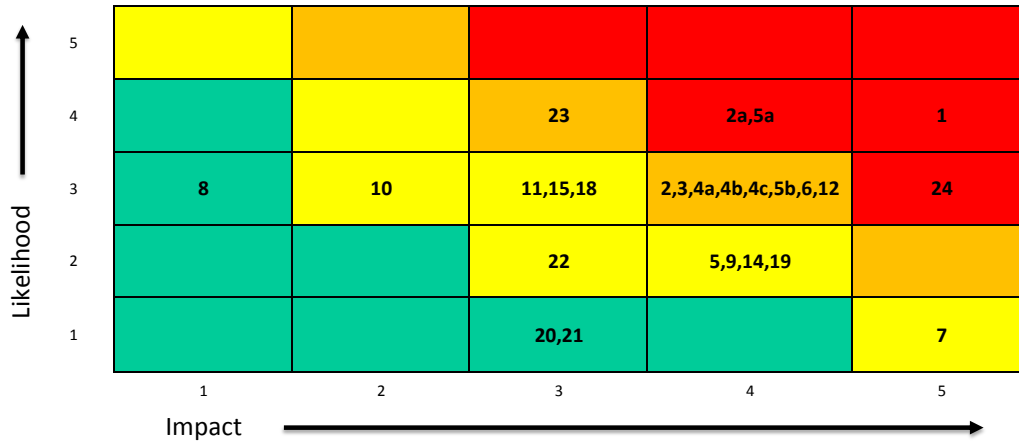


### ECHS Risk Register



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	LHO	OD	IMPA	CT		RISK	RATI	NG	LIKE	LHO			OD	IMPA
1	All	<b>Failure to deliver ECHS Financial Strategy</b>	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Continual reduction in Central Government funding</li> <li>- Demographic changes</li> <li>- Increased demand for services</li> <li>- Demand led statutory services (c. 80% of operations) which can be difficult to predict</li> <li>- Increasing cost volatility due to rise of complex, high cost families or placements requiring services.</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Lower than anticipated levels of financial resource</li> <li>- Failure to achieve a balanced budget</li> <li>- Failure to secure economy, efficiency, and effectiveness of use of resources leading to a Qualified Independent Auditors' Report</li> <li>- Objectives of the service not met</li> <li>- Reputation is impacted</li> <li>- Wider goals of the Council are not achieved</li> </ul>	Financial		5		5		25	<ul style="list-style-type: none"> <li>- Budget monitoring and forecasting</li> <li>- Regular review of medium term strategy</li> <li>- Regular reporting to DLT and Members via the Committee reporting process</li> <li>- Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money</li> <li>- Monitor demographics, economic indicators and develop insight into future demand</li> <li>- Match financial planning to Council priorities</li> <li>- Internal audit framework</li> <li>- Early intervention with service users</li> <li>- Constantly reviewing service operations for potential efficiencies</li> <li>- 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</li> <li>- Growth and mitigation discussions</li> <li>- Service strategies in place to mitigate growth</li> </ul>		4		5		20	<ul style="list-style-type: none"> <li>- Plans covering 10 projects in Children's Social Care went to the Corporate Commissioning Board in September 2018 outlining savings proposals to be implemented.</li> <li>- Plans are in place in Children's Social Care for improving sufficiency whilst reducing identified areas of budget.</li> <li>- Developing Housing Strategy.</li> <li>- 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.</li> <li>- Delivering commissioning actions in Transformation Board programme for ASC.</li> </ul>	ECHS DLT  Gillian Palmer, Janet Bailey, Sara Bowrey, Naheed Chaudhry, Paul Feven, Kim Carey, Nada Lemic, Jared Nehra.
2	Adult Social Care	<b>Failure to deliver effective Adult Social Care services</b> The Council is unable to deliver an effective adult social care service to fulfil its statutory obligations including the safeguarding of Adults	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Increasing demand</li> <li>- Above compounded by associated longer waiting lists leading to deteriorating condition and ultimately increased service user/ carer costs</li> <li>- Failure to deliver effective safeguarding arrangements</li> <li>- Failure to comply with statutory requirements including the Care Act</li> <li>- Potential instability in social care workforce</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Impact on life chances and outcomes for service users</li> <li>- Failure to keep vulnerable adults safe from harm or abuse</li> </ul>	Legal, Reputational		4		4		16	<p><b>Care Act</b> - Redesigned processes, including amending forms, and operational procedures in place and Care Act compliance training</p> <p><b>Improved Better Care Fund</b> - Programme overseen by the Interim Director of Programmes and the CCG</p> <p><b>Safeguarding</b> - 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><b>Recruitment</b> - Dedicated HR programme of support in place to recruit social workers to front line posts</p> <p><b>Performance Monitoring Framework</b> - Review of Performance Management Indicators</p> <p><b>Procurement and Contract Monitoring</b> - Effective procurement framework and contract monitoring arrangements to ensure acceptable quality of service provision and value for money</p>		3		4		12	- Actions as part of LBB's Transformation Plan	Director, Adult Social Care (Kim Carey)
2a	Learning Disability Service	<b>Failure to deliver effective Learning Disability services</b> Failure to assess service users, establish eligibility criteria and carry out the review process.	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Failure to identify and meet service users' needs</li> <li>- Provision of service to ineligible clients</li> <li>- Provision of service prior to/without appropriate authorisation</li> <li>- Failure to manage the transition process of service users from Children's Services to Adult Services leading to increased risk of Judicial Review</li> <li>- Potential instability in social care workforce</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Costs associated with Legal process</li> <li>- Ongoing care package costs as a result of Legal process outcome</li> <li>- Placement predictions leading to financial pressures (cross refer ECHS Budget risk)</li> </ul>	Legal, Reputational		4		4		16	<ul style="list-style-type: none"> <li>- Close monitoring of placements and eligibility criteria</li> <li>- Budget monitoring and forecasting</li> <li>- Regular review of medium term strategy</li> <li>- Regular reporting to DLT and Care Services PDS</li> <li>- Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money</li> <li>- Hold provider to account for poor performance</li> <li>- Monitor demographics, economic indicators and develop insight into future demand</li> </ul>		4		4		16	- 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	<b>Failure to deliver effective Children's services</b> 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><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Local authority response to Bromley Safeguarding Children's Board following Wood Review.</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Impact on life chances and outcomes for children</li> </ul>	Legal, Reputational		3		5		15	<ul style="list-style-type: none"> <li>- Multi Agency Bromley Children's Safeguarding Board (BCSB) Training programme 2019 to be set.</li> <li>- Dedicated HR programme of support in place to recruit social workers to front line posts</li> <li>- Scrutiny of Performance Management Framework and Indicators</li> <li>- Effective procurement framework and contract monitoring arrangements to ensure acceptable quality of service provision and value for money - under review</li> <li>- Quality Assurance Audit Programme Phase 3</li> <li>- Children's Service Practice Improvement Board to commence April 2019 to deliver Ofsted and local authority recommendations.</li> <li>- Continued reduction of caseloads &amp; within Caseload Promise on average</li> <li>- Identified training plan for qualified social workers and other professionals reviewed and updated quarterly</li> </ul>		3		4		12	- 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	LHO	OD	IMPA	CT		RISK	RATI	NG	LIKE	LHO			OD	IMPA
4a	Children's Social Care	<b>Recruitment and Retention - CSC</b> Failure to recruit and retain key skilled staff with suitable experience/qualifications	<b>Cause(s):</b> - 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 <b>Effect(s):</b> - 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	<b>Recruitment and Retention - ASC</b> Failure to recruit and retain key skilled staff with suitable experience/qualifications	<b>Cause(s):</b> - 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 <b>Effect(s):</b> - 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	<b>Recruitment and Retention - Housing</b> Failure to recruit and retain key skilled staff with suitable experience/qualifications	<b>Cause(s):</b> - Failure to compete with other organisations to recruit the highest quality candidates to build an agile workforce - Small pool of experienced workers <b>Effect(s):</b> - 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	<b>Failure to deliver effective Housing Needs services</b> The Council is unable to deliver an effective Housing Needs service to fulfil its statutory obligations	<b>Cause(s):</b> - very demand led - lack of trained staff - homelessness is increasing number and complexity of cases <b>Effect(s):</b> - 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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					LIKE	LHO	OD	IMPA	CT		RISK	RATI	NG	LIKE	LHO			OD	IMPA	CT	RISK
5a	Housing Needs	<b>Temporary Accommodation</b> Inability to effectively manage the volume of people presenting themselves as homeless and the additional pressures placed on the homelessness budgets	<b>Causes:</b> - changes in government funding - rising number of placements (approx. 20 per month)  <b>Effect(s):</b> - 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)	<b>Capital Grant</b> 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)	<b>Cause(s):</b> - 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  <b>Effect(s):</b> - 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	<b>Inability to deliver an effective Public Health service</b> The Council is unable to deliver an effective Public Health service to fulfil its statutory obligations	<b>Cause(s):</b> - Reduced budget which has led to funding cuts, reduced service and redundancies. Withdrawal of non-statutory services. - Potential fluctuating medicines market  <b>Effect(s):</b> - 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	<b>Business Interruption / Emergency Planning</b> Failure to provide Council services or statutory requirements of mass illness/fatalities scenario following a business interruption or emergency planning event	<b>Cause(s):</b> - 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)  <b>Effect(s):</b> - 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

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Q4 2018/19

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8	All ECHS Divisions	<b>Contracts and Service Level Agreements</b> 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	<b>Cause(s):</b> - Failure of provider - Provider withdrawing from the contract <b>Effect(s):</b> - 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	<b>School Place Planning</b> Failure to meet the statutory requirement to ensure sufficient school places to meet the needs of the population in the area	<b>Cause(s):</b> - 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 <b>Effect(s):</b> - 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	<b>Not in Education, Employment or Training (NEET)</b> 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	<b>Cause(s):</b> - Lack of control over Academies <b>Effect(s):</b> - 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	<b>Transport - School and Adult Social Care</b> 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	<b>Cause(s):</b> - 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 <b>Effect(s):</b> - 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	<b>SEND Reforms</b> Failure to meet expectation of SEND reforms	<b>Cause(s):</b> - 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 <b>Effect(s):</b> - 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)

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Q4 2018/19

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					LIKE LIHO OD	IMPA CT	RISK RATI NG	LIKE LIHO OD	IMPA CT		RISK RATI NG						
14	Children's Social Care	<b>Youth Offending</b> Failure to deliver effective youth offending services to protect children and young people and reduce their vulnerability	<b>Cause(s):</b> - Increase in youth offending <b>Effect(s):</b> - 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	<b>Out of Borough Placements (Children and Young People)</b> Inability to reduce reliance on out of borough placements Financial implications	<b>Cause(s):</b> - Failure to provide/commission sufficient local placements for children with disabilities and children in care <b>Effect(s):</b> - 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	<b>Welfare Reform</b> Impact of Welfare Reform legislation (including Universal Credit).	<b>Cause(s):</b> - 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 <b>Effect(s):</b> - 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	<b>Deprivation of Liberty</b> Failure to prevent unlawful deprivation of liberty	<b>Cause(s):</b> - 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 <b>Effect(s):</b> - 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	<b>Data Collections</b> 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	<b>Cause(s):</b> - Business Interruption <b>Effect(s):</b> - 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)				

## 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	LHO	OD	IMPA	CT		RISK	RATI	NG	LIKE	LHO			OD	IMPA	CT	RISK	RATI	NG	
21	Education	<b>30 hours funded childcare for three and four year olds of working parents</b> The Council is unable to provide sufficient places within the local sector to fulfil its Statutory Duty	<b>Cause(s):</b> - 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 <b>Effect(s):</b> - Parental dissatisfaction - Official notification from DfE regarding failure to fulfil statutory duty - Delays in payment to providers, destabilising local businesses.	Political, Reputational		1		3		3					1		3		3				- Market research to identify best fit IT solution completed. Gateway report underway with recommendation for procurement of appropriate solution.	Director, Education (Jared Nehra)
22	Programmes	<b>Failure to deliver partial implementation of Health &amp; Social Care Integration</b> Plans are not in place to deliver partial integration by 2020	<b>Cause(s):</b> - 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 <b>Effect(s):</b> - Failure to deliver statutory duties - Failure to achieve our Building a Better Bromley priorities	Financial Reputational Compliance /Regulation		2		3		6				2		3		6				- Discussions around the developing Integrated Care System with Bromley CCG	Director, Programmes (Paul Feven) Director, Integrated Commissioning- BCCG Graham Mackenzie	
23	Education	<b>Speech and Language Therapy</b> Failure to provide appropriate SALT services to children and young people	<b>Cause(s):</b> - Current service provision not meeting needs of children and young people in a timely way <b>Effect(s):</b> - Failure to meet the need of children and young people including those with SEN/D and other vulnerabilities	Legal Reputational Professional		4		3		12				4		3		12				- Review of service begun in November 2018 to consider impact and effectiveness of current provision and potential service improvements. - Identification of additional funding for 2018/19. £250,000 from BCF funding and £90,000 from Bromley Clinical Commissioning Group.	- Multi-agency review of SaLT provision underway. Extraordinary meeting of Integrated Commissioning Board to be held 29 April.	Director of Education (Jared Nehra)
24	Strategy, Performance and Engagement	<b>Social Care Information System</b> Failure to procure and implement new system	<b>Cause(s):</b> - Failure to establish tender specification of need - Failure to procure within budget - Failure to appoint appropriate Programme Manager and team to manage implementation - Failure to effectively implement and go live <b>Effect(s):</b> - Failure to safeguard vulnerable children and adults - Failure to manage children and adult records effectively	Financial Legal Data		4		5		20				3		5		15				- A multi-disciplinary Programme Board in place - Reviewing landscape of procurement options - Job description of qualified, experienced Programme Manager evaluated.	- Recruit to posts - Develop programme plan	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><b>High Risk</b> - review controls and actions every month</p> <p><b>Significant Risk</b> - review controls and actions every 3 months</p> <p><b>Medium Risk</b> - review controls and actions every 6 months</p> <p><b>Low Risk</b> - 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	Score - 2	Score - 3	Score - 4	Score - 5
	Insignificant	Minor	Moderate	Major	Catastrophic
<b>Compliance &amp; Regulation</b>	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
<b>Financial</b>	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
<b>Service Delivery</b>	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)
<b>Reputation</b>	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
<b>Health &amp; Safety</b>	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

Identify your risks	Assess your risks	Control your risks	Monitor and Review your risks
<p>Brainstorming session using IE&amp;E plans and departmental objectives, to identify threats and opportunities.</p> <p>Useful analytical tools:</p> <p><b>Political</b>  <b>Economic</b>  <b>Social</b>  <b>Technological</b>  <b>Legal</b>  <b>Environmental</b></p> <p><b>PESTLE</b> provides a simple and useful framework for identifying and analysing external factors which may have an impact on your service.</p> <p><b>Strengths</b>  <b>Weaknesses</b>  <b>Opportunities</b>  <b>Threats</b></p> <p>Using the <b>PESTLE</b> output <b>SWOT</b> 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?  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 <b>Risk Appetite</b>? An element of risk is unavoidable or we would never do anything!</p> <p><b>AVOID</b> a risk – stop doing the activity</p> <p><b>REDUCE</b> a risk – put additional controls in place</p> <p><b>TRANSFER</b> a risk – by insuring or passing the risk to a third party</p> <p><b>TAKE</b> a risk – monitor to ensure the impact and likelihood do not change</p> <p>Risk of service failure can be minimised by ensuring effective <b>Business Continuity Plans</b> 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 <b>threats</b> that may hinder delivery of priorities and maximise <b>opportunities</b> 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 <b>Risk Management</b> can be found in the Managers' Toolkit on onebromley. This also provides links to the <b>Risk Management Strategy, Risk Management Toolkit</b> and <b>Risk Register</b>.</p> <p>The site also provides a link to the <b>Health and Safety</b> Unit who carry out H&amp;S risk assessments. For guidance contact the Corporate Safety Advisor Charlotte Faint x7584.</p>

# ECHS Risk Register

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					LIKE	LIHO	OD	IMPA	CT		RISK	LIHO	OD	IMPA	CT			RISK			
13	Education	<b>School Standards</b> Failure to meet duty to promote educational achievement of all children	<b>Cause(s):</b> - 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 <b>Effect(s):</b> Impact on life chances and outcomes for children and young people	Political Legal Professional Reputational	1			4		4				1			3		3		Director, Education (Gillian Palmer)
16	Children's Social Care	<b>Foster Carers</b> Failure to meet the statutory requirement to ensure sufficient local placements to satisfy need	<b>Cause(s):</b> - Failure to recruit sufficient carers, particularly for adolescents, siblings, disabled children, parent and child placements, and BME children <b>Effect(s):</b> - 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				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	<b>Care Leavers' accommodation</b> Failure to provide a sufficient range of safe and suitable housing for care leavers	<b>Cause(s):</b> - Failure to appropriately risk assess housing provision offered to care leavers <b>Effect(s):</b> - Impact on life chances and outcomes for Care Leavers	Legal	3			3		9				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)