

# Children, Education and Families Risk Register - Appendix D

Q4 2021/22

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
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1	Children's Services	<b>Failure to deliver Children's Services 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> <li>- Specific cost factors impacting transport 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</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 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 and SEND including mitigating actions addressing financial pressures</li> <li>- Growth and mitigation discussions</li> <li>- Service strategies in place to mitigate growth</li> <li>- High Needs Funding Banding review underway to develop equitable system across schools and settings, focus on sustainability of funding</li> </ul>	4	5	20	<ul style="list-style-type: none"> <li>- Plans are in place in Children's Social Care for improving sufficiency whilst reducing identified areas of budget.</li> <li>- Transformation work being undertaken on High Needs spend on SEND</li> <li>- SEND / AP green paper published - partnership response and consideration of existing activities aligned with direction of travel</li> <li>- Transformation work being undertaken on CYP Integrated Therapies designed to strengthen the borough's graduated approach and more proportionately engage children and young people at the level meeting their need. Increased funding has been required historically and currently to attempt to increase capacity in relation to SLT and OT to meet increased demand - this work, and the development of a Therapies Commissioning Framework aims to reduce the current over reliance and funding of specialist services and to ensure value for money as well as quality and consistency.</li> </ul>	Director, Children's Services (Richard Baldwin)	
2	Children's Services	<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 Partnership 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 Partnership (BCSP) Training programme 2022 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 Framework tried and tested through Practice Review cycle and Practice Assurance Stocktakes</li> <li>- Children's Service Practice Improvement Board commenced April 2019 to deliver Ofsted and local authority recommendations, this continues with a review taking place of the PIB model</li> <li>- Continued review of caseloads &amp; within Caseload Promise on average and assurance of manageable caseloads</li> </ul>	3	4	12	<ul style="list-style-type: none"> <li>- Phase 3 'to excellence' plan continues with Performance Improvement Board (PIB) sessions continuing to be held quarterly.</li> <li>- Practice review cycle and Practice Assurance Stocktakes (PAS) continue</li> <li>- Return to work emphasis in place and noticeable increase with positive impact on staff morale</li> </ul>	Director, Children's Services (Richard Baldwin)		
3	Children's Services	<b>Recruitment and Retention</b> Failure to recruit and retain key skilled staff with suitable experience/qualifications	<p><b>Cause(s):</b></p> <ul style="list-style-type: none"> <li>- Failure to compete with other organisations to recruit the highest quality candidates to build an agile workforce</li> <li>- Small pool of experienced children's Social Workers</li> </ul> <p><b>Effect(s):</b></p> <ul style="list-style-type: none"> <li>- Failure to identify and meet service user needs</li> <li>- Provision of service to ineligible clients</li> <li>- Provision of service prior to/without appropriate authorisation</li> <li>- Lack of skill set results in an inability to deliver effective children's services to fulfil statutory safeguarding obligations, impacting</li> </ul>	Personnel	5	4	20	<ul style="list-style-type: none"> <li>- Dedicated HR role to support managers in recruiting social workers to front line posts</li> <li>- Joint meetings held between HR and employment agencies to improve the quality and speed of locum assignments</li> <li>- Review of the current Recruitment and Retention package through Recruitment and Retention Board</li> <li>- Recruitment drive to convert locums to permanent staff</li> <li>- Commissioning of improvements to the Council's recruitment web site to include a video virtual tour of the Council</li> <li>- Support in effectively managing staff performance</li> <li>- Provision of training measures to include targeted leadership and management training programmes including partners and other stakeholders</li> <li>- Tailored individual career plan for staff</li> <li>- Launch of Social Work Academy in April 2019.</li> <li>- Bespoke training for first line managers on-going with cohort 2</li> <li>- Training and quality assurance of practice</li> </ul>	3	4	12	Workforce (April 2022) 78% permanent.	Director, Children's Services (Richard Baldwin)  Director, Human Resources (Charles Obazuaye)		

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4	Children's Services	<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	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	- Business Continuity Plans reviewed annually. BCP reviewed and activated in response to Covid 19 Service risk assessment undertaken for staff at Civic and reviewed when necessary	Director, Children's Services (Richard Baldwin)	
5	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 DfE ESFA to support delivery of Free School and PSBP programmes - Monitor contractor performance in uncertain market	4	3	12	- Continue to work with DfE on delivery of approved new secondary and special Free Schools at the earliest possible opening date	Director, Education (Jared Nehra)	
6	Children's Services	<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 - Lack of suitable opportunities for young people locally <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 targeted support - Children Looked After NEET support - Tracking service in conjunction with South London CCIS Service  - Provision offered by Bromley Education Business Partnership (BEBP): - Bromley Youth Employment Scheme (YES) - Bromley Flexible Learning programme - Mentoring programme - Work related learning and work experience for Children Looked After and Care Leavers  Generic EET Strategy being developed in consultation with YJS  - ETE Strategy for LCT and Care is in place with ETE panel and DWP/Bromley education business partnership/Youth Support Programme, I aspire and social care working to identify new opportunities for young people at risk of NETE- Active Involvement team have offered group work programme based on employability skills for young people who are NETE - I Aspire social impact bond programme has ceased and we continue to engage with a	3	2	6	- Work related learning and work experience and apprenticeship programmes are delayed due to Covid 19 - Monitoring the length of time YP remain NEET to measure impact of Covid 19 and efficacy of NEET strategy within CLA and Leaving Care service	Director, Children's Services (Richard Baldwin)	

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7	Education	<b>SEND Transport</b> Failure to provide appropriate home to school transport assistance for children and young people with special educational needs and disabilities	<b>Cause(s):</b> - Fluctuating demand year on year - Rising numbers of children meeting criteria for transport provision and associated increase in costs - Cost pressures from market place and rising fuel prices <b>Effect(s):</b> - Disruption to education - Impact on life chances and outcomes for children and young people	Legal Financial	5	3	15	- Budget monitoring and forecasting - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - Tender exercise completed and framework contract awarded - Monitoring of market place fluctuations	3	3	9	SEND transport review paper in development.	Director, Education (Jared Nehra)		
8	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	- SEN service realigned to improve decision making and management oversight - Service Level Agreements being established with mainstream settings with additionally resourced provisions to provide clarity across both parties - Legal advice to be drawn in to support complex tribunal cases - Local Area Autism Partnership established with Autism strategy developed - Annual review programme, with additional resource identified - Covid-19 programmes established - data reporting, collaborative risk assessments, vulnerable CYP programme and CFA Modifications - Special Free School tendering process underway, Specialist placement planning model commissioned - Engagement framework finalised, CYP participation officer in place - Additional capacity in the Statutory assessment team agreed, recruitment in train with specific focus on vulnerable groups including CLA/LC cohort, CME/CMoE, NEET and EHE - increased resource identified to support schools in confidence to deliver education for CYP who have Dyslexia and other specific learning difficulties (SpLD) - investment in two new posts (SEN Placements Manager and SEN Annual Reviews Manager) to focus support in these two key areas	3	3	9	Bromley Teaching Schools leading SEN training collaborative to support school improvement. - Annual review project reviewed and re-established and broadened with multi-agency task and finish group - Quality Assurance and Improvement Framework revised and changes currently being embedded - Explore commissioning options for therapy capacity - Special Free School - identify Trust to deliver the new school - increase resource for Educational Psychology agreed, challenge with shortage of EP nationally – blended model of delivery developed - PRA approach revised - SEND / AP green paper published - partnership response and consideration of existing activities aligned with direction of travel - HNF Banding Review programme in train to develop equitable funding system, with a focus on sustainability	Director, Education (Jared Nehra)		
9	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	- Youth Justice Plan 2021 in place. The YJP for 2022 is in the process of being written and will be concluded next month. - Implementation of the Youth Justice Strategy 2020-2023 in place - Fortnightly Improvement Board with Head of Service and YOS management team - Frequent Monthly auditing programme as part of CSC Practice Improvement timetable.. - 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. - The Strategic Board chaired by the CEO - Three sub groups to the Strategic Board chaired by partners as part of YOS Inspection prep - Youth Justice Board self-assessment of National standards submitted July 20	2	4	8	-Readiness for Youth Offending Service inspection is monitored through challenge sessions and Improvement Board meetings and the strategic Board -Self Evaluation and story board drafted	Director, Children's Services (Richard Baldwin)		

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10	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 Budget risk) - Impact for children's welfare and development	Professional  Financial		3	3	9	- Close monitoring of placements and eligibility criteria at multi agency resource panel - Budget monitoring and forecasting - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - 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. - Step down from residential to foster care programme in place. - Work with housing to support Young People moving to own tenancy when ready and reduce risk of homelessness	3	3	9	Recent successful engagement event with local residential providers to establish different ways of working and engaging designed at increasing accessibility, quality, and discussing cost of placements and ways of contracting - follow-up visits and discussions have followed to explore further options to strengthen relationship and joint working. - Strengthening of contract and partnership working with the Commissioning Alliance focusing on oversight and performance within contract, engagement and building of networks.	Director, Children's Services (Richard Baldwin)	
11	Strategy, Performance and Corporate Transformation	<b>Data Collections</b> Failure to undertake statutory statistical data collections; including pupil census, attainment data and key 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 Strategy and Performance 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	All data requirements met to enable delivery of statutory data returns.	Assistant Director, Strategy, Performance and Corporate Transformation (Naheed Chaudhry)	
12	Education	<b>Funded childcare places for two, 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> - Early Years Provider businesses failing financially as a result of the pandemic and impact it had on demand for childcare. - Insufficient places within local sector resulting in Local Authority failure to meet its statutory duty - Inability to fully implement IT system to support parental registrations  <b>Effect(s):</b> - Parental dissatisfaction (availability of places or Parental Portal system failures) - Official notification from DfE regarding failure to fulfil statutory duty - Delays in payment to providers, destabilising local businesses and businesses and loss of confidence in LA's processes.	Political, Reputational		2	3	6	- Signposting to early years business support tools in place and Quality Officers resumed supportive sites visits to settings. - Local pockets of sufficiency of places pressure remain, which may be exacerbated by impact of as yet unknown demand from Ukrainian refugees. - Monitoring eligibility, confirmations and take up of places to predict growth of demand on a monthly basis. - Full Early Years Sufficiency assessment completed last year, annual update summary due this summer. - IT funding system operational and embedded into process, automated monthly payments to settings working well, Census data captured within system.	2	2	4	- Parental Portal steering group to review business case for proceeding with implementation and integration of phase 3 (parent portal) - Completion of annual sufficiency review and publish outcome data - Send lam2 postcards to all families identified as potentially eligible for funded 2 year old places to stimulate demand for places thereby improving existing settings sustainability.	Director, Education (Jared Nehra)	

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13	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	- Multi-agency review of SaLT provision underway. - Further review of how SaLT is delivered within Bromley is also underway - Occupational Therapy - urgent actions being taken to identify support for EHCP Needs Assessments professional advice - sourcing urgent specialist	4	3	12	MB Update: - Work with core provider (BHC) regarding SLT provision capacity currently being undertaken given current levels of demand and pressures/demand on the system - Integrated Therapies Transformation work focusing on increasing accessibility of SLT services and resources at proportionate levels designed to meet needs of CYP - Engagement Working Groups undertaken with children, young people#, parents and schools & settings in February and March 2022 to coproduce this strengthened SLT offer.	Director of Education (Jared Nehra)		
14	Strategy, Performance and Corporate Transformation	<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 retain Programme Manager and appoint 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 Failure to meet regulators expectations (Ofsted)	Financial Legal Data	4	5	20	- Programme Board established providing governance - Multi-disciplinary 'SCIS' team appointed and contracts secured. - Procurement strategy agreed, tenders evaluated, programme within budget, award of contract brought forward to May 2020 from July. - SCIS team influencing Transformation work streams to maximise digitalisation opportunities.	2	2	4	- Successful go live for Childrens in July 2021. - Post go live fixes completed by January 2022. - Management of system bedding into BAU.	Assistant Director, Strategy, Performance and Corporate Transformation (Naheed Chaudhry)		
15	Education	<b>School Attendance</b> Ensuring return of children to school	<b>Cause(s):</b> - Children not returning to school following Covid-19 lockdown - Increased EHE declarations - Lack of real time data from schools <b>Effect(s):</b> - Children may not be in receipt of satisfactory education	Legal Reputational	3	4	12	- EWOs support schools with improving attendance - EHE officers monitor and follow up on new EHE cases & CSC involvement checked - Mental health and wellbeing initiatives being prioritised	2	4	8	- Further monitoring of EHE and non-attendance, working closely with schools to respond to Covid-specific guidance Menatl Health and Wellbeing Toolkit embedded in schools	Director of Education (Jared Nehra)		