

Children, Education and Families Risk Register

| 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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| | | | | | LIKELIHOOD | IMPACT | RISK RATING | | LIKELIHOOD | IMPACT | RISK RATING | | |
| 1 | Children's Services | Failure to deliver Children's Services 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. - Specific cost factors impacting transport 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 | <p>Growth and mitigation discussions informed by robust demand forecast analysis</p> <p>Medium financial term strategy reviews informed by evidence of demand pressures. Match financial planning to Council priorities</p> <p>Budget monitoring and forecasting</p> <p>Regular reporting to Members via the Committee reporting process</p> <p>Effective contract monitoring to ensure quality of service provision and value for money</p> <p>Internal audit framework to test financial controls</p> <p>Constantly reviewing service operations for potential efficiencies</p> <p>Developed a series of commissioning plans, with mitigating actions, for Children's Social Care and SEND including mitigating actions addressing financial pressures</p> | 4 | 5 | 20 | <p>Transformation work being undertaken on CLA Placements Sufficiency, High Needs spend on SEND and Transport.</p> <p>Further engagement / coproduction sessions with CYP, parents, schools & setting re strengthening the SEND Graduated Approach - website design and graduated approach being received well.</p> <p>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.</p> <p>DSG Deficit Recovery Plan principles agreed by SEND Governance Board and Schools Forum. Detailed Plan in development.</p> <p>Work to ensure equitable funding contributions to placements across E, H & C</p> <ul style="list-style-type: none"> - Health (Community Paediatric) now participating into EHC Needs Assessment Panel (NAP) to ensure earlier and more effective multi-agency working and triaging, more informed decisions regarding which CYP require EHC Needs Assessment and Plan and those that may be offered more appropriate / proportionate resource / service across the levels of the Graduated Approach. - Commissioning Framework document in development to be circulated and used across all therapy providers to ensure increased quality, safety, consistency and pave way for preferred list of providers moving forward - Plans are in place in Children's Social Care for improving CLA placement sufficiency | Director, Children's Services (Richard Baldwin) |
| 2 | Children's Services | Failure to deliver effective Children's services The Council is unable to deliver an effective children's service to fulfil its statutory obligations in safeguarding and protect those at risk of significant harm or death, sexual exploitation or missing from care | <p>Cause(s):</p> <ul style="list-style-type: none"> - Local authority response to Bromley Safeguarding Children's Partnership following Wood Review. <p>Effect(s):</p> <ul style="list-style-type: none"> - Impact on life chances and outcomes for children | Legal, Reputational | 3 | 5 | 15 | <p>Scrutiny of Performance Management Framework and Indicators with regular deep live reporting</p> <p>Quality Assurance Framework overseen by independent Practice Improvement Board</p> <p>Engagement and Influence, Bromley relationship Model ensure user feedback informs continuous improvement.</p> <p>Multi Agency Bromley Children's Safeguarding Partnership (BCSP) Training programme in place. - Training plan for qualified social workers and other professionals reviewed and updated quarterly.</p> <p>Dedicated HR programme of support in place to enable recruitment and retention.</p> <p>Effective procurement framework and contract monitoring arrangements ensure acceptable quality of service provision and value for money</p> <p>Continued review of caseloads & within Caseload Promise on average and assurance of manageable caseloads</p> | 3 | 3 | 9 | <p>Phase 3 'to excellence' plan continues with Performance Improvement Board (PIB)</p> <p>Robust audit cycle in place.</p> <p>Demand Management forecasts informing MTFS</p> | Director, Children's Services (Richard Baldwin) |
| 3 | Children's Services | Recruitment and Retention Failure to recruit and retain key skilled staff with suitable experience/qualifications | <p>Cause(s):</p> <ul style="list-style-type: none"> - 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 and other qualified roles (Nursery Practitioners, Supervised Contact Workers) <p>Effect(s):</p> <ul style="list-style-type: none"> - 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 | <ul style="list-style-type: none"> - Dedicated HR team to support managers in recruiting staff to hard to fill positions in CSC and Education - 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 and associated strategies through corporate Recruitment and Retention Board - Recruitment drive to convert locums to permanent staff - Utilisation of bespoke recruitment tools to directly source 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 - Training and quality assurance of practice - Established Social Work Academy with bespoke training offers to support career progression | 3 | 4 | 12 | <p>Continued review of caseloads in children social care and assurance of manageable caseloads</p> <p>Caseloads in SEN Statutory Assessment Team above London and statistical neighbour averages. Transformation plan for SEN being developed</p> | <p>Director, Children's Services (Richard Baldwin)</p> <p>Director, Human Resources (Charles Obazuaye)</p> |
| 4 | Children's Services | Emergency Response (ER) / Business Continuity (BC) ER - Failure to provide to respond effectively to an emergency incident internally or externally BC - Lack of up-to-date, tested and exercised BC arrangements for Children's Social Care | <p>Cause(s):</p> <ul style="list-style-type: none"> ER - Ineffective emergency response arrangements in place to respond to an incident. BC - Lack of suitable BC plans at service and Corporate level <p>Effect(s):</p> <ul style="list-style-type: none"> ER - Impact upon financial and reputational matters BC - Failure to deliver statutory services | Personnel, Reputational | 3 | 4 | 12 | <p>ER – Corporate Major Emergency Response plan</p> <ul style="list-style-type: none"> Out of hours on call emergency response capability Trained emergency response volunteer cohort Ongoing training & exercising programme Multi-agency assessment of emergency risks with associated mitigation <p>BC - Full suite of BC plans across CSC</p> <ul style="list-style-type: none"> Overarching Corporate BC plan including prioritisation of all services Continued CLT delivery of the BC management process Continued monitoring and auditing of key suppliers BC arrangements Yearly Directorate and Corporate testing & Exercising programme | 3 | 3 | 9 | <p>ER - Recruit and train more emergency response volunteers to maintain required levels of trained staff. Yearly training programme, numbers reviewed on a monthly basis</p> <p>BC - Delivery of service and corporate BC testing and exercising programme to further embed BC arrangements – December 2023 to February 2024</p> | Director, Children's Services (Richard Baldwin) |
| 5 | 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 | <p>Cause(s):</p> <ul style="list-style-type: none"> - 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 <p>Effect(s):</p> <ul style="list-style-type: none"> - Disruption to the education of children and impact on their life chances | Political, Legal, Professional | 3 | 4 | 12 | <ul style="list-style-type: none"> - 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 | <ul style="list-style-type: none"> - Following request from Harris Federation the DfE have removed the secondary free school scheme from its free school programme. Council has £3m capital contingency to assist in addressing a shortage in secondary places. - Redwood Academy Special Free School. Further delays have arisen in the DfE-led project that is currently at feasibility. Officers are pressing DfE for movement on project. | Director, Education (Jared Nehra) |

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| 6 | Education | SEND Transport Failure to provide appropriate home to school transport assistance for children and young people with special educational needs and disabilities | <p>Cause(s):</p> <ul style="list-style-type: none"> - 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 <p>Effect(s):</p> <ul style="list-style-type: none"> - Disruption to education - Impact on life chances and outcomes for children and young people | Legal, Financial | 5 | 3 | 15 | <ul style="list-style-type: none"> - 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 - Purchase of route optimisation software 'QRoutes' - Introduction of Independent Travel Training offer | 3 | 4 | 12 | SEND transport review undertaken. Proposed initiatives have passed through PDS Committee and Executive. Once complete and following consultation, revised transport policies will seek to be adopted which will create greater opportunities and flexibilities in the transport offer including opportunities for independent travel training, and access to personal transport budgets. Significant work has been undertaken to optimise the routes into schools to ensure vehicles operate at greater capacity and vehicle numbers reduced as a result. The tendering exercise based on the optimised routes has been successfully delivered reducing the numbers of vehicles operating and reducing the average daily costs of routes. Numbers continue to come through (as they will throughout the year) and these introduce new challenges. At this point in the year there is limited spare capacity which in turn demands a premium price. Formal consultation has been completed and final approval decision taken. Full implementation now underway. | Director, Education (Jared Nehra) |
| 7 | Education | SEND Reforms Failure to meet expectation of SEND reforms | <p>Cause(s):</p> <ul style="list-style-type: none"> - 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 <p>Effect(s):</p> <ul style="list-style-type: none"> - 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 | <ul style="list-style-type: none"> - 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 | <p>Revised SEND Strategic Vision and Priorities has been agreed by SEND Governance Board, with a greater focus on driving outcomes and ensuring the sustainability of High Needs funding</p> <p>Transformation work is ongoing, linked closely with the DSG deficit recovery management plan</p> <p>Bromley Teaching Schools leading SEN training collaborative to support school improvement.</p> <ul style="list-style-type: none"> - 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 approved and in pre-opening status - 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) |
| 8 | Children's Social Care | Youth Offending Failure to deliver effective youth offending services to protect children and young people and reduce their vulnerability | <p>Cause(s):</p> <ul style="list-style-type: none"> - Increase in youth offending <p>Effect(s):</p> <ul style="list-style-type: none"> - 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 | <p>Youth Justice Strategy 2020-2023 in place, annual reports submitted in a timely way.</p> <p>Quality Assurance and auditing programme established.</p> <p>YOS performance monitoring reviews KPIs, act upon trends and drive improvement plan</p> <ul style="list-style-type: none"> - 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. - YJS Strategic Board chaired by the CEO | 2 | 4 | 8 | Ongoing preparedness for Youth Offending Service inspection, self evaluation established. Continued focus on early intervention and disproportionality work. | Director, Children's Services (Richard Baldwin) |
| 9 | Children's Social Care | Out of Borough Placements (Children and Young People) Inability to reduce reliance on out of borough placements Financial implications | <p>Cause(s):</p> <ul style="list-style-type: none"> - Failure to provide/commission sufficient local placements for children with disabilities and children in care <p>Effect(s):</p> <ul style="list-style-type: none"> - Cost implications of out of borough placements (Cross refer Budget risk) - Impact for children's welfare and development | Professional, Financial | 3 | 3 | 9 | <ul style="list-style-type: none"> - 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 | <p>CLA Sufficiency Strategy, annual updated and agreed at PDS</p> <p>In-house foster care recruitment stretch target remains in place, additional funding agreed to enable recruitment strategy .</p> <p>Successful ongoing engagement with local residential providers discussing, quality and commissioning, strengthening relationship and joint working.</p> <p>Visits undertaken by commissioning, CSC and Central Placements Team to ensure a joint and integrated approach</p> <p>Compliance Officer in place to ensure quality, safety and effectiveness of placement and experience for our CLA</p> <p>New Horizons project established to enable step down placements to foster care</p> <p>Review of Commissioning alliance allowing for greater access to local placements, review of alternative block arrangements</p> | Director, Children's Services (Richard Baldwin) |
| 10 | Education | Speech and Language Therapy Failure to provide appropriate SaLT services to children and young people | <p>Cause(s):</p> <ul style="list-style-type: none"> - Current service provision not meeting needs of children and young people in a timely way <p>Effect(s):</p> <ul style="list-style-type: none"> - Failure to meet the need of children and young people including those with SEN/D and other vulnerabilities | Legal, Reputational, Professional | 4 | 3 | 12 | <ul style="list-style-type: none"> - Multi-agency review of SaLT provision - Work with core provider (BHC) regarding SLT provision capacity undertaken given current levels of demand and pressures/demand on the system - Engagement Working Groups undertaken with children, young people, parents and schools & settings in February and March 2022 to coproduce this strengthened SLT offer. | 4 | 3 | 12 | <p>Occupational Therapy - urgent actions being taken to identify support for EHCP Needs Assessments professional advice - sourcing urgent specialist</p> <p>Mental Health and Wellbeing Toolkit embedded in schools.</p> <p>BHC has employed an experienced Therapies Project Manager to deliver on the organisation's Therapy offer and plan. Project Manager has been working on a plan for SLT (and OT and Physio) to restructure the service offer in a way that mirrors and reflects the borough's wider piece of transformation work to strengthen the Graduated Approach - meaning earlier support, signposting and multi-agency collaborative working to better enable a more appropriate and proportionate offer in line with the specific and individual needs of CYP in the borough</p> <p>-Publication of the B-hive website is the first step in establishing a whole system approach to supporting SaLT needs, led by Integrated Commissioning</p> | Director of Education (Jared Nehra) |
| 11 | Education | School Attendance Ensuring return of children to school | <p>Cause(s):</p> <ul style="list-style-type: none"> - Children not returning to school following Covid-19 lockdown - Increased EHE declarations - Lack of real time data from schools <p>Effect(s):</p> <ul style="list-style-type: none"> - Children may not be in receipt of satisfactory education | Legal, Reputational | 3 | 4 | 12 | <ul style="list-style-type: none"> - 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 | <p>Monitoring of EHE and non-attendance is ongoing</p> <p>Work closely with schools through their Single Points of Contact (SPOC)</p> <p>Mental Health and Wellbeing Toolkit embedded in schools.</p> <p>Attendance and Inclusion Taskforce has introduction of 'Studybugs' a specialist data provider to capture and report on live data from schools. Most schools are now signed up. This will inform targeted support and assistance from the Education Welfare Service.</p> <p>Attendance of vulnerable groups remain a key priority, with the new data analysis functionality enabling greater targeting of resource.</p> <p>The Service plans to publish Local Inclusion Dashboards by September 2023.</p> | Director of Education (Jared Nehra) |