

PART 1 - PUBLIC

Decision Maker: **Audit Sub Committee**

Date: **16th March 2011**

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

Title: **INTERNAL AUDIT PROGRESS REPORT**

Contact Officer: Luis Remedios, Deputy Chief Internal Auditor
Tel: 020 8313 4588 E-mail: luis.remedios@bromley.gov.uk

Chief Officer: Paul Dale, Director of Resouces and Deputy Chief Executive

Ward: All

1. Reason for report

This report informs Members of recent audit activity across the Council and provides updates on matters arising from the last Audit Sub Committee. It covers:-

3.1 Outstanding Matters

- 3.11 Previous Priority One Recommendations
- 3.15 Debtors
- 3.18 Progress and new issues since the last meeting
- 3.24 Waivers
- 3.32 Value for Money (VfM)

3.46 Current Matters

- 3.47 New Priority One Recommendations
 - 3.49 Housing Benefit Update
 - 3.52 Partnership Working
 - 3.54 Risk Management
-

2. **RECOMMENDATION(S)**

- a. **Note the report and comment upon matters arising from the internal audit progress report.**
- b. **Note the continuing achievements of the counter fraud benefit partnership with Greenwich Council. (para 3.50)**

- c. Members to note the action proposed for publicising to claimants the successes in prosecuting benefit fraud cases.**
- d. Members to note the findings of our review of VfM arrangements.**

Corporate Policy

1. Policy Status: Existing policy.
 2. BBB Priority: Excellent Council.
-

Financial

1. Cost of proposal: N/A
 2. Ongoing costs: Recurring cost.
 3. Budget head/performance centre: Internal Audit
 4. Total current budget for this head: £587,520 excluding the benefit fraud partnership costs but subject to reduction.
 5. Source of funding: N/A
-

Staff

1. Number of staff (current and additional): 10 FTE
 2. If from existing staff resources, number of staff hours: 380 days per quarter
-

Legal

1. Legal Requirement: Statutory requirement. Accounts and Audit Regs 2006
 2. Call-in: Call-in is not applicable.
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): 180 including Chief Officers, Head Teachers/Governors
-

Ward Councillor Views

1. Have Ward Councillors been asked for comments? N/A.
2. Summary of Ward Councillors comments: None

3. COMMENTARY

3.1 Outstanding matters

3.2 Notification of fraud prosecutions to benefit claimants

3.3 At the last meeting of this committee, members considered proposals for publicising our successful fraud prosecutions to all benefit claimants. Following discussions the Sub – Committee supported inclusion of logos highlighting benefit fraud sanctions and total prosecuted to date. Officers were tasked with coming up with a proposal that would meet the above member requirements.

3.4 Having considered the above, officers have agreed that it would be best if the message was attached with the annual benefit letters that go to all claimants in March 2011. It was felt that the best way forward was to include the anti fraud poster (see Appendix A) with the annual benefit letter. In addition there will be a reference to the number of claimants we have prosecuted for fraud. The cost for this exercise will be £1,060 to include art work, copies for every claimant and postage.

3.5 Reclaiming staff costs for successful prosecutions

3.6 At the last meeting of this committee officers were asked to look at reclaiming all reasonable costs for cases that had been successfully prosecuted. At present we currently seek to recover legal costs in all successful cases. In some cases costs are not awarded where the magistrate/judge deem that there is an inability to pay or the sentence imposed is sufficient for instance a custodial sentence. On discussion with Greenwich management, their experience of attempting to claim costs for their own cases, in fact hampered any costs being awarded as when added to the legal costs it appeared to be excessive. However, Greenwich management also felt that it would pursue staff costs for cases where overpayments were high and also subject to asset recovery procedures.

3.7 Housing Benefit Future Proposals

3.8 At the last meeting of this committee we had reported our concerns on central government proposals to set up a single integrated fraud investigation service under the control of the DWP with effect from April 2013. Consultation is still ongoing but it appears that this proposal will go ahead. We had presented information to this committee that contrasted long delays and inaction for cases requiring prosecution on the part of the DWP compared with those cases dealt directly by Greenwich. The members considered the evidence and minuted that action should be taken by the Chairman writing to the Department for Works and Pensions outlining member concerns regarding the government proposals. A letter has been drafted for the Chairman's approval.

3.9 Officer Expenses

3.10 We previously reported the breakdown of the amounts paid to officers in 2009/10 within each category e.g. mileage, essential car user allowances, car loans etc. Members requested that an analysis was carried out to ascertain why the level of subsistence had increased from £1,025 in 2008/9 to £2,883 in 2009/10. A detailed review has taken place and this increase has resulted from officers claiming subsistence via payroll rather than being reimbursed from petty cash.

3.11 Previous priority one recommendations

3.12 The latest list of outstanding priority one recommendations is shown in Appendix B. Since our last report to Audit Sub Committee there has been ongoing activity by management to implement these. Appendix B currently shows 9 priority ones. At the last cycle we had reported 14 of which 5 have been implemented – Emergency Accommodation and Rent Accounts (3 out of 4 have been implemented- see part 2 agenda Primary School A (1) where issues raised by the previous governing body have been resolved with the change in governors; Building Maintenance (1) – where Bromley has now received a parent company guarantee and a performance bond.

3.13 In respect of previous priority ones that are still outstanding, it should be noted that the reconciliation of parking income has improved since the previous audit but the latest review has led to a further recommendation on the need to reconcile car park kiosk income that had been outstanding since July 2010. Procedures for reconciliation of the various avenues of car parking also needed to be detailed.

3.14 Primary School C – the school had paid staff twice in June 2010 when both the current and previous payroll provider had paid the salary. £84,983 had been overpaid – on checking for amounts recovered there still remained £10,700 to be recovered as at the end of January 2011.

3.15 Debtors.

3.16 At the last meeting of this committee members had noted the amount of long term ACS debts totalled £916K out of a total of £1.57million. As a result they requested that this matter should be reported to ACS PDS Committee including a breakdown of the general category and recommendations on how to reduce the level of long term debt. Liberata have introduced a new system to analyse debts and this will be used shortly with a report to the next ACS PDS in April 2011.

3.17 Members also requested an update on the debt from the Primary School of £58,339 and we can advise that this has now been paid.

3.18 Progress and new issues since the last meeting

3.19 For the period April 2010 to January 2011 we issued 132 reports against this year's plan to either draft or final stage. These include full systems and probity audits, schools and follow up audits. This equates to approximately 76% of the audit plan which is as expected for the 10 month period. The performance indicator for completion of the audit plan is 90%. There are 30 audits where there is work in progress at the time of writing this report. In addition, 16 audits were completed to final stage in respect of the 2009/10 plan. The fraud partnership with LB Greenwich has also produced three reports following investigations that have been reported upon previously in Part 2.

3.20 91% of the audits have been completed within the agreed budgeted time allowed against a performance indicator requirement of 90%. The feedback from clients has been very positive with an average score of 4.3 out of 5 against the target of 3.

3.21 A target that has been partially met is the two month elapse time between commencement of field work and issue of draft report. The performance indicator requires that 95% of the audits should be completed within two months of commencement of fieldwork whereas we have achieved 87%. This is a slight decrease on the 90% reported in the last cycle of this committee. There are a number of reasons

for this including awaiting information from clients, extending the original scope where there are major findings e.g. emergency accommodation and rent accounts and auditors being asked to carry out ad hoc work including investigations, staff vacancy, sick leave and work currently being undertaken for LB Greenwich. Internal Audit management will closely monitor this indicator.

3.22 The planned schools audits have all been achieved to date. We have rolled out our assisted audits programme for the secondary schools. Assisted audits require schools and colleges to assist in the audit process under the management of Internal Audit thereby increasing the auditees' perception of the audit process as well as saving on audit time. Two secondary schools Kemnal Technology College and Darrick Wood School have been subject to a closure audit as they have converted to Academy Status. We have recently completed our closure audit for Darrick Wood School where we found no probity issues or excessive pre academy expenditure that could lead to deficit balance issues. The School has carried forward a surplus balance that is currently being managed by the Schools Finance Team. Pension fund deficits have arisen as an issue at both establishments and are subject to an ongoing debate. There are a number of secondary schools that are due to become academies in 2011/12 and will therefore be subject to closure audits. We have continued to attend the academy operations group and have offered all schools that are intending to go to academy status, our services to carry out internal audits for a reasonable fee. There has been some interest but nothing has been formalised. With the abolition of the FMSiS external assessment requirement we have reverted back to carry out normal auditing for the primary schools for 2010/11.

3.23 In addition we have continued to assist on an investigation at a primary school that appears in part 2 of the agenda.

3.24 **Waivers**

3.25 We are now submitting our third list of waivers across the Authority for the period September 2010 to February 2011. See appendices C and D. The list is collated from the Heads of Finance for each of the Service areas and any information kept by the Chief Officers. Members are asked to review this list and comment as necessary. The contract procedures require that these are reported on a bi-annual basis to Audit Sub Committee. We had previously reported on waivers in the September 2010 cycle of this committee.

3.26 Rule 3 of the contracts procedure state that where there is the need to Waive the requirements for Competitive Bids pursuant to rule 13.1 or any other provision of these Contract Procurement Rules because of an unforeseeable emergency involving immediate risk to persons or property or serious disruption to Council services or significant damage or potential damage to the image or reputation of the Council (including circumstances which require a Strategic Performance Centre Manager to invoke a Business Continuity Plan) a Chief Officer may exercise such Exemption or Waiver subject to the following:

3.27 Where the value of a relevant contract (or proposed contract) exceeds £50,000 the Agreement of the Director of Legal, Democratic and Customer Services shall be obtained.

3.28 Where the value of a relevant contract (or proposed contract) exceeds £100,000 the Agreement of the Director of Legal, Democratic and Customer Services, the Director of Resources and the Agreement of the relevant Portfolio Holder shall be obtained.

3.29 Where the value of a relevant contract (or proposed contract) exceeds £1 million the Agreement of the Director of Legal, Democratic and Customer Services, the Director of Resources and the Agreement of the relevant Portfolio Holder shall be obtained.

3.30 Negotiated contracts are covered by contracts procedure rule 13.1. A decision to negotiate with one or more candidates on any arrangements required within the Procurement process shall not be made except in compliance with the following and any Public Procurement Regulations (see also Rule 3). Note - For the purpose of this Rule the establishment of a Service Level Agreement is treated as being a negotiated arrangement.

3.31 We were informed that there were no waivers in the period for Environment Services.

3.32 Value for Money (VfM)

3.33 Members of this committee had previously agreed the methodology for Internal Audit to use in assessing the value for money arrangements for designated areas covered in the audit plan. The emphasis was that although Internal Audit should remain focussed on its core business it was well placed to carry out VfM using this methodology. The Sub-Committee also noted the role of the Organisational Improvement Team where lower scores of 1 or 2 were achieved. Members should note that as a result of our five assessments detailed below and comments received from senior managers, we are in the process of making some amendments that will be reported at the next cycle.

3.34 A simplified scoring matrix for reviewing VfM risks and controls had been drawn up and scored on a scale of 1 – 4. Members were keen to pilot this in a service that was due to be audited. We had therefore reviewed a couple of areas – Building Control Section in Renewal and Recreation and Homecare in Adult and Community Services. The overriding principle is the requirement that it is the section's responsibility to ensure VfM studies are being actioned.

- 1- would equate to not met in any areas of VfM arrangements (although this no way indicates that a poor service is being provided or that customers are dissatisfied at the quality level of service – it just reflects that there are no VfM arrangements in place); where there is a score of 1, the audit will attempt to research availability of benchmarking data, highlight such shortcomings in the audit report to management and refer the matter to the Organisational Improvement Team of the Chief Executive who would pick it up in a review of the service.
- 2 -would equate to VfM arrangements partially met where there are some aspects of VfM in place but these are not robust enough to reach an informed decision that the service is achieving VfM. (e.g. data submitted for benchmarking is not accurate enough or cannot be substantiated or customer satisfaction surveys have not taken place, although there may be a benchmarking exercise that was completed; or that the service is operating at high unit costs in comparison with other Boroughs costs although providing a satisfactory service). The matter would then be referred to the Organisational Improvement Team who would pick it up in a review of the service.
- 3-would equate to VfM arrangements being substantially met (e.g. benchmarking is complete with figures substantiated; benchmarking shows that the section is generally performing well in comparison with other Authorities; however the mark down could for instance relate to customer surveys not being carried out to ascertain quality of service)
- 4 would equate to VfM arrangements being fully met (e.g. the service is benchmarked; benchmarking figures are substantiated; benchmarking shows good performance;

areas of good practice in other Authorities have been adopted; good customer satisfaction returns; the service operates within budget).

3.35 We analysed audits left to complete for the rest of the financial year and identified audits where this approved methodology will be used. This includes areas such as parking income, waste, street services, town centre management, planning, carelink, residential care, youth service, fostering and adoption, SEN transport, early years etc. Some of these are still ongoing but listed below are our findings on VfM arrangements that have been completed.

3.36 Parking Income

3.37 We have recently completed an audit of this area including a review of VfM arrangements and concluded that this scored an overall 3 i.e. substantially met. This is based on the following:

- Benchmarking rated as a 3 given comparison with other Boroughs and that the section still perceives that improvements can be made to rationalise the charging structure and in some cases increase charges with the approval of members.
- Customer surveys a rating of 3 based on surveys within the authority car parks only. This has resulted in a number of improvements to the car parks in respect of lighting, colour coding of each floor level, resurfacing and repainting of stairwells, replacement of CCTV cameras and installation of vision intelligence CCTV.
- External assessments are rated as 3 based on Star Chamber Parking Review 2010 and previous internal audit reviews where opinions ranged from limited to currently substantial. There was also a member working group supported by a parallel officer group that undertook a comprehensive review and reported to Environment PDS in June 2009.
- Budget rated as 2 given that although service is within budget for expenditure there has been an under achievement on expected income that is recognised corporately.

3.38 Town Centre Management

3.39 We have recently completed a review of VfM arrangements and concluded that this scored an overall 3 i.e. substantially met. This is based on the following:

- Benchmarking rated as a 3 as figures for footfall and vacancy rates are measured and reported through 'Are We On Track (AWOT)' Vacancy rates are recorded against a database from a company and for footfall an organisation produces average footfall rates to compare against. Results of AWOT are taken into consideration and where weaknesses are identified, town centre managers are required to work with retailers and key stakeholders. The Section has also been subject to a recent restructuring exercise and certain expenditure under the control of Town Centre Management such as Christmas lighting has been subject to a recent tendering exercise to ensure best value. Officers also attend regional and sub regional groups such as London Councils officer groups and the South London Partnership Skills and Employment Group. The team also has regular contact with officers in other boroughs to compare their approach to Christmas lights, events and vehicle messaging systems. Officers in the team are members of the Association of Town Centre Management (ATCM) and take advantage of benchmarking information that is available on the website and also make reference to the ATCM's 'Guide to Good Practice'. It is also recognised that evaluating town centres can be

problematic due to the unique nature of location, the way they are managed and also political considerations

- Customer surveys has been rated 3 to reflect that certain surveys do take place on rides, entertainments, promotions, annual continental market in Bromley town centre only. Surveys on views and support needs of businesses in Bromley North Village have also been conducted in March 2010. Feedback using a standard template is usually sought after an event from participants/organisers that covers successes and lessons to be learnt. There is some scope for improvement such as borough wide surveys covering both businesses and public opinion.
- External assessment has been rated 3. This is an area that is not subject to external assessment. A detailed internal review resulting in a restructuring has taken place over a year ago. This area has also been subject to internal audit reviews over the past four years including one that has just been completed.
- Budget has been rated 3 on the assumption that additional private income of £38k will be received that will ensure that the service is within budget. The budget is monitored with managers receiving regular reports.

3.40 Waste

3.41 We have recently completed a review of VfM arrangements and concluded that this scored an overall 4 i.e. fully met. This is based on the following:

- Benchmarking has been rated as a 4 on the basis of information provided. The Head of Waste Management advised that benchmarking is undertaken as part of the annual submission of statistical figures to CIPFA and DEFRA. Benchmarking figures are validated by the Head of Finance ESD before submission. The results are reviewed to assess where performance by other councils appears to differ substantively from Bromley's. This process is documented primarily through a combination of financial modelling, reports to Members and a PDS Working Group. The service is performing well against the national indicators. Waste Services' performance is benchmarked using three National Indicators: NI 191 (household waste quantity); NI 192 (% of waste recycled or composted); and NI 193 (% waste landfill). Benchmarking focuses on NI 192 as the most reliable measure of comparative local authority performance. NI 191 relates more closely to household behaviour, and NI 193 is distorted by differences in access to local incinerator facilities. Bromley's NI 192 performance in 2008/09, the most recently audited year, was 36% and ranked fifth out of 33 London authorities. At that time all four of the higher performing boroughs collected food waste borough-wide and lessons were drawn from their experiences. Now that Bromley has rolled out Recycling and Composting for All, our performance has significantly improved to 46% in Quarter 3 of 2010/11 despite disruption to the service caused by snowfall. Bromley's improving standards were recognised by the Municipal Journal in 2010, the borough being the only London authority shortlisted for the Journal's waste services award.

Expenditure is benchmarked against CIPFA data which shows that Bromley's costs are significantly below average for similar boroughs. Three of the 2008/09 higher performing boroughs offer a free, universal collection of green garden waste. This is not considered value for money, as on top of the collection and disposal costs, there is an adverse impact on overall tonnages.

A benchmarking tool for the service, developed by Tribal consultancy for the London Environment Directors' Network, is also utilised.

- External Assessment have been rated as 4 as the service is mainly self reporting. The service was audited by the Environment Agency in 2008-09. The audit was satisfactory. Waste has also been subject to yearly internal audits.
- Customer surveys have been rated as 4. A postal survey was undertaken by the service in April 2010 to assess overall opinion of/commitment to the new food waste collection trial. The survey results highlighted that the residents were generally happy with the new scheme. Suggestions on further improvements to the service were also invited as part of the survey. A survey was also carried out in May 2008. It was delivered to 4,883 properties in the original trial area. 2,570 questionnaires were returned, representing a 53% return. Along with questions on the food waste element of the trial, the questionnaire also included questions on the paper recycling collection service, the green box recycling service, the home composting offer (ability to purchase subsidised containers), the paid for garden waste collection service, and the impact on the refuse collection service (which at the time was still weekly).
- Budget has been rated as 4 on the basis that costs are projected to be below budget due to a significant decrease in tonnage costs. There are monitoring meetings are held between Head of Waste Services and Head of Finance ESD.

3.42 CareLink

3.43 We have recently completed a review of VfM arrangements and concluded that this scored an overall 2 i.e. partially met. This is based on the following:

- Benchmarking is rated as a 2 as the service is currently developing VfM arrangements. The service has recently been asked to provide statistics to TeleCare Services Association. Bromley CareLink is a member of this association who are setting up a benchmarking club with approximately 40 member authorities.
- External assessments are rated as a 2. There has been no external assessment as this service is not subject to an external assessment regime. Internal audit have carried out 3 reviews in the last 5 years.
- Customer satisfaction is rated as a 3. A customer satisfaction survey is carried out annually. 200 clients are selected from a total population over 2,000 including ACS clients, private clients receiving both monitoring and full response service. The survey for the current year has just commenced. The previous year's survey showed that around 50% of users were not aware of the complaints procedure. The manager confirmed that the complaints brochure was part of the standard induction package.
- Budget is rated as a 3. Budgets are monitored regularly and there are currently no variances that need investigation. There are some issues around coding of expenditure incurred by the CareLink service. Some expenses are coded to Supporting Independence which attracts grant funding. This will be remedied in 2011/12 when there will be one code used for all income and expenditure relating to use of CareLink.

- As a result of the scoring we are referring this to the Organisational Improvement Team in Chief Executives who may be able to offer assistance.

3.44 Planning

3.45 We have recently completed an audit of this area including a review of VfM arrangements and concluded that this scored an overall 3 i.e. substantially met. This is based on the following:

- Benchmarking rated as a 3 based on the comparisons with other boroughs showed that the service was performing above average in keeping expenditure low and performance high however there was still room for improvement in Minor and other works.
- Customer surveys a rating of 3 based on surveys given out with every decision notice, and collated. It was noted that a prepaid envelope is supplied to encourage return of the surveys.
- External assessments are rated as 3 based on the annual internal audit reports most recently giving the service “substantial assurance” and the “Lean thinking” commissioned external assessment of planning.
- Budget as 3 given that the service is within budget the expenditure is low in comparison with many other boroughs and Planning (including renewal) is within budget.

3.46 Current Matters

3.47 New priority one recommendations

3.48 There were no new priority one recommendations in finalised reports since the last cycle.

3.49 Housing Benefit Update

3.50 Since the inception of the partnership in April 2002, through to January 2011, the Council has successfully prosecuted 266 claimants to date for benefit fraud; issued 240 court summonses; given 84 formal cautions; and administered 259 penalties. The full details and appendices on trends are shown in appendices E, F and G.

3.51 There are a few ongoing cases where the partnership is still in the process of recovering large fraudulent overpayments by confiscation of assets using the Proceeds of Crime legislation.

3.52 Partnership Working

3.53 We had reported previously our intention to work closely with the London Borough of Greenwich. With an expected 25% cut in the audit budget we have sought to minimise the effect on staffing resources by exploring partnership working with the London Borough of Greenwich. A draft agreement has been drawn up awaiting formal agreement. This agreement requires Internal Audit Bromley to carry out a number of audits on behalf of the Internal Audit and Anti Fraud Team of the London Borough of Greenwich that equates to 300 days in the year 2011/12 generating £100k. This income offsets part of our 25% savings of £300K required and effectively keeps 3 auditors in post. It is estimated that 1.5 full time equivalent staffing will be required to

complete this Greenwich work therefore meaning that 1.5 staff is funded from income generated that can be fully employed on Bromley work. Our plan for 2011/12 has been adjusted to take into account the partnership working. We have already been requested to carry out 3 audits in this financial year by LB Greenwich which will have some impact on our plan but will generate income. We have completed two of these assignments to draft report stage with a third nearing draft report stage. This work will generate about £14k in 2010/11.

3.54 Risk Management

3.55 Annual Governance Statement

Regulation 4(2) of the Accounts and Audit Regulations 2003, as amended by the Accounts and Audit (Amendment) (England) Regulations 2006, requires authorities to 'conduct a review at least once in a year of the effectiveness of its system of internal control' and to prepare a statement on internal control 'in accordance with proper practices'.

3.56 The Department for Communities and Local Government is currently carrying out a consultation to revise and consolidate the 2003 Regulations, as amended, with a timetable of bringing the new 2011 Regulations into force on 31 March 2011. Current regulation 4(4) requires the statement of internal control to be included with an authority's published accounts. This has been amended to require the statement to accompany the published accounts, to make clear that the statement is not part of the accounts.

3.57 From 2007/08, the Annual Governance Statement (AGS) replaced the Statement on Internal Control and is now the formal statement that recognises, records and publishes an authority's governance arrangements.

3.58 The AGS explains how Bromley has complied with its own Code of Corporate Governance which reflects the following six core principles of good governance:

1. Focusing on the purpose of the authority and on outcomes for the community and creating and implementing a vision for the local area.
2. Members and Officers working together to achieve a common purpose with clearly defined function and roles.
3. Promoting values for the authority and demonstrating the values of good governance through upholding high standards of conduct and behaviour.
4. Taking informed and transparent decisions which are subject to effective scrutiny and managing risks.
5. Developing the capacity and capability of Members and Officers to be effective.
6. Engaging with local people and other stakeholders to ensure robust public accountability.

3.59 The Code of Corporate Governance was recently updated to incorporate the additional governance requirements resulting from CIPFA's *Statement on the Role of the Chief Financial Officer in Local Government (2010)*.

3.60 As risk management features strongly in the AGS process this year's review is again

being co-ordinated by the Risk Management Group. The purpose of the review is to provide assurance from a number of sources including Members, Chief Officers, internal and external audit, and other review agencies and inspectorates that corporate governance arrangements are adequate and operating effectively; or where gaps are revealed, action is planned that will ensure effective governance in future.

- 3.61** The assurance gathering process (see Appendix H) includes a full review of the risk register, the completion of a checklist and the signing of assurance statements by the Assistant Directors and Chief Officers. Further background information can now be found on the Annual Governance Statement page on the Risk Management and Insurance site on onebromley:

<http://onebromley/HDoI/ManKit/wikisite/Wiki%20Pages/Annual%20Governance%20Statement.aspx>

- 3.62** The AGS is signed off by the Chief Executive and the leader of the Council and is currently published in the Annual Report and Statement of Accounts. In view of the new Regulations we await guidance as to whether the AGS can continue to be published in this way.

3.63 Code of Corporate Governance

The revised Code of Corporate Governance was noted at the last meeting with some minor amendments. This has since been endorsed by the Standards Committee on 20 January 2011, subject to some minor changes, for adoption by the Council.

3.64 Risk Register

As the risk register is currently being updated, as part of the AGS review, we attach a schedule of the current net high risks for the record (Appendix I). Given the need for service reduction planning a number of the risks will require revision and updating with several new risks likely to emerge. The full risk register can be accessed via the Managers' Toolkit on onebromley. See following link to the Risk Management and Insurance site:

<http://onebromley/HDoI/ManKit/wikisite/Wiki%20Pages/Risk%20Management%20and%20Insurance.aspx>

4. POLICY IMPLICATIONS

None.

5. FINANCIAL IMPLICATIONS

Some of the findings identified in the audit reports mentioned above will have financial implications.

6. LEGAL IMPLICATIONS

None.

7. PERSONNEL IMPLICATIONS

None.

Non-Applicable Sections:	[List non-applicable sections here]
Background Documents: (Access via Contact Officer)	http://www.dwp.gov.uk/docs/tackling-fraud-and-error.pdf