

Brighton & Hove City Council

Strategic Risk Assessment Report SR15;
SR17; and SR24

As at 20 February 2017

Initial Rating

	IMPACT				
	Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
LIKELIHOOD					
Almost Certain (5)	0	0	0	0	0
Likely (4)	0	0	1	1	0
Possible (3)	0	0	0	1	0
Unlikely (2)	0	0	0	0	0
Almost Impossible (1)	0	0	0	0	0

Revised Rating


	IMPACT				
	Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
LIKELIHOOD					
Almost Certain (5)	0	0	0	0	0
Likely (4)	0	0	1	0	0
Possible (3)	0	0	0	2	0
Unlikely (2)	0	0	0	0	0
Almost Impossible (1)	0	0	0	0	0

1 - 3
Low
Monitor periodically

4 - 7
Moderate
Monitor if the risk levels increase

8 - 14
Significant
Review and ensure effective controls

15 - 25
High
Immediate action required & need to escalate to the management level above

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR15	Keeping children safe from harm and abuse	Executive Director Families, Children & Learning Service Manager - Directorate Policy & Business Support Assistant Director - Children's Health, Safeguarding & Care	BHCC Strategic Risk, Legislative	08/02/17	Threat	Treat	 L4 x I4	 L3 x I4		Revised: Adequate

Causes

Link to Corporate Plan: Priority Children & Young People: Safeguard children and young people and reduce the rate of re-referral
 Keeping vulnerable children safe from harm and abuse is a legal responsibility of the Council. Legislation requires all local authorities to act in accordance with national guidance (Working Together) to ensure robust safeguarding practice. This includes the responsibility to ensure an effective Local Safeguarding Children Board (LSCB) which oversees work locally and in partnership with Police, Health and social care providers. The numbers of children in care and those on Child Protection Plans are significantly higher than in similar authorities. The number of children and young people who are sexually exploited is also of concern.

Potential Consequence(s)

The complexity of circumstances for many children presents a constant state of risk which demands informed and reflective professional judgement, and often urgent and decisive action, by all agencies using agreed thresholds and procedures. Such complexity inevitably presents a high degree of risk. Children subject to abuse, exploitation and/or neglect are unlikely to achieve and maintain a satisfactory level of health or development, or their health and development will be significantly impaired. In some circumstances, abuse and neglect may lead to a child's death.

Existing Controls

35

First Line of Defence: Management Controls

Robust quality assurance processes embedded and reported on annually

LSCB Work Plan established with strong leadership by the Independent Chair with aligned LSCB sub-group work plans

Serious Case, Local Management and Child Death Reviews identify learning and action for improvement

The directorate has full engagement with the LSCB

There is a strong focus on working with CYP at risk of being missing from care, home and education

MASH launched in September 14 to provide robust risk assessments and information sharing between partner agencies

SFSC programme targets support to the most vulnerable families

Continuous professional development and training opportunities offered by the LSCB and good multi agency take up of training

In line with the Government's Prevent Strategy, work with the Police, Statutory Partners, Third Sector Organisations and Communities to reduce radicalisation

Threshold document, agreed by all agencies, signed off by Children and Young People Committee; and LSCB on 2 & 3rd June 2014

Continuous professional development and learning opportunities offered by the LSCB and good multi agency take up of training

New model of practice (wef Oct 2015) for social work teams, with Pods in place to provide stability to service users

Performance management across children's social work enables a more informed view on current activity and planning for future service changes;

Second Line of Defence: Corporate Oversight

Early Help strategy in place and governance arrangements in place via LSCB and the MASH Board

Quality Assurance within the city and also across key agencies monitored by the LSCB sub group

The Child Review Board meetings quarterly and is an opportunity for Lead Members to receive information, provide challenge and comments on children's social care issues with Heads of Service, Assistant Director and Director for Children's Services

Reports delivered to LSCB following robust auditing of multi-agency case files and safeguarding practice;

Third Line of Defence: Independent Assurance

Ofsted inspected our social work arrangements in May 2015 and an action plan was developed to take forward recommendations.

LGA Peer Review on Safeguarding recently completed in September 2016 which provided assurance (and helpful challenge) regarding progress against the Ofsted inspection report.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Ensure there are effective pathways, information sharing and risk management between MASH and Early Help Hub as part of a wider Early Help review	Assistant Director - Children's Health, Safeguarding & Care	75	31/03/17	01/04/16	31/03/17

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: Progress to date: The LGA Safeguarding Peer Review in September 2016 found that the MASH process was good but did question the two front doors. The recent audit by LSCB with regards effectiveness of the system was positive and the EHH BPI review with regards systems and processes in May 2016 was positive. Next steps are that actions from LSCB audit are to be reviewed by the Head of Service for Children in Need. A review of Early Help is starting, with an engagement phase starting with staff in December 2016. Additionally the detailed findings from the Safeguarding Peer Review will be considered when received (final report due January 2017).</p>					
High quality social work is provided to ensure that CYP are effectively safeguarded	Assistant Director - Children's Health, Safeguarding & Care	75	31/03/17	01/04/16	31/03/17
<p>Comments: Progress to date: The LGA Safeguarding Peer Review in September 2016 found that children are being effectively safeguarded and that quality of work is improving and of a good standard. The Quality Assurance Framework (QAF) is fully established with Performance Management systems. In quarter 2 there was 87% compliance with auditing activity. Links have been established with Principal Social Worker to ensure learning from audit activity and case reviews is fed into social work practice. The Safeguarding Peer Review noted the impact of Lead Practitioners in driving through good practice. SLT continue to monitor action plans arising from Quality Assurance activity. Learning is disseminated via staff briefings and workshops and seminars led by Lead Practitioners. During the quarter 2 73% of cases audited through QA activity had a judgement of ,at least, 'good'. Improved activity in numbers of Children in Care in the criminal justice system has been attributed to the improved working between the Youth Offending Team and Social Work service and also the Adolescent service. At end of quarter 1 there were 9 children in care in the criminal justice system the previous year there were 27 children throughout the year. reducing the percentage from 26% to 10%. Next steps include to continue to action the QAF and monitor performance through SLT and DMT Performance Board and to maintain the existing learning system, both led by the Head of Safeguarding and Performance by Mar 17.</p>					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR17	School Places Planning	Executive Director Families, Children & Learning Service Manager - Directorate Policy & Business Support Assistant Director Education & Skills Head of School Organisation	BHCC Strategic Risk, Customer / Citizen	08/02/2017	Threat	Treat	Amber L4 x I3	Amber L3 x I4		Revised: Adequate

Causes

Link to Corporate Plan: Priority Children & Young People: Deliver sufficient school places

The Council has a statutory role to ensure primary and secondary school places meet future need. There has been an upturn in the birth rate so that since 2003, the number of school aged children living the city has been increasing year on year, therefore pupil places are increasingly challenged. This is particularly acute in areas when in previous years pupil yield has previously been very much lower. While previously there has been a focus on primary school places in the next few years we will have a significant pressure on secondary school places.

Potential Consequence(s)

- * Parents may not feel able to secure a place for their child in the local community;
- * There may be increased travelling;
- * Without identifying new sites, existing schools may become overcrowded or larger.

Existing Controls

First Line of Defence: Management Controls

School Organisation Plan routinely reviewed internally and pupil forecasting element received independent assurance in 2015

Work has been ongoing on securing site for new secondary school

465 new primary school places (15.5 classes) added in last five years

Two new free schools opened in city

Four class junior site opened on Hove Police Station site September 2014

One new permanent form of entry opened in September 2014 at West Hove Infant School (Connaught)

Following a public consultation two permanent additional forms of entry opened in September 2015 in primary schools serving areas of highest demand, with funding identified in the capital programme

Council officers are working with schools where there are spare places to assist them in developing and sustaining strong partnership relationships with the primary schools in their catchment area;

Second Line of Defence: Corporate Oversight

Strategic Risk 17 agreed by ELT and last reviewed six monthly

Audit & Standards Committee focus on all strategic risks

Cross Party Working Group (supported by a group consisting of all ten secondary schools, the three colleges and the two universities with the local authority) has been meeting to develop proposals around a new secondary admissions process with full engagement exercise conducted in first half of 2016, proposals will be formally consulted, once new school location known

Secondary Continuing Education meeting established to raise awareness including and involving all schools, colleges and two city universities. This has focused on school organisation

Third Line of Defence: Independent Assurance

In case of dispute over admissions arrangements the Office of the Schools Adjudicator will adjudicate

80% of schools are currently assessed by Ofsted as good or outstanding and a new School Improvement Strategy has been adopted to support the target of all schools being good or outstanding

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
To implement the School Organisation Plan to ensure sufficient school places to meet future need	Assistant Director Education & Skills	75	31/03/17	01/04/16	31/03/17

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: Progress to date: Progress on the content of the School Organisation Plan has not been progressed as anticipated due to the impact of unanticipated tasks meaning the Cross Party School Organisation Working Group have yet to consider a draft of the document and provide feedback. School Partnerships have been contacted regarding the scheduling of slots to discuss the item and a meeting has already taken place with the Portslade partnership of schools. An individual meeting has also taken place with one of the city's secondary schools. The SOP has been finalised and shared with the CPSOWG on 16 November for further feedback, confirming the schedule of meetings with school partnerships over autumn/spring term to discuss school organisation. School admissions arrangements for 2018/19 have been agreed by January 2017 CYPS Committee and for the School Organisation Plan will be taken to a Children, Young People and Skills Committee meeting in 2017. All overseen by the Head of School Organisation.</p>					
<p>To secure agreement on the location of a new six form entry secondary school in Brighton (to ensure there are sufficient school places to meet growing numbers of students) to open September 2018</p>	<p>Assistant Director Education & Skills</p>	<p>75</p>	<p>31/03/17</p>	<p>01/04/16</p>	<p>31/03/17</p>
<p>Comments: A further site search has been undertaken by the Council in consultation with the EFA which has not identified any further sites as possible locations for the new school. The 2 known sites remain under active consideration but progress is dependent upon the work of the individual institutions, however dialogue is maintained. The council continues to be represented at the University of Brighton's steering group and working parties considering the new build and curriculum. The Cross Party School Organisation Working Group will be receiving a presentation from the University of Brighton at its next meeting in February 2017 where the progress made towards the school's opening will be considered further. A further update of future pupil numbers based on updated data from GP registrations will be generated for the meeting in February which will also be able to review the pattern of applications and likely allocation of secondary school places in September 2017. This data will help stakeholders consider the necessary steps to take to ensure sufficient school places in the city.</p>					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR24	Welfare Reform	Executive Director of Finance & Resources Welfare Reform Programme Manager	BHCC Strategic Risk	08/02/17	Threat	Treat	Amber L3 x I4	Amber L4 x I3		Revised: Uncertain

Causes
Link to Corporate Plan: Outcome ' A modern council: Providing open civic leadership and effective public services'
Introduction of Universal Credit during 2015/16 with extended roll out during 2016. Implications for staffing levels within services; TUPE issues to DWP; rent collection; council tax collection and pressures on social services and homeless services.
Additionally further to the July 2015 national budget a new programme of welfare reform is commencing from April 2016.

Potential Consequence(s)
Increased service pressures on housing and social services.
Decreased rent and Council Tax collection

Existing Controls

First Line of Defence: Management Actions

1. A welfare reform team is in place to monitor welfare changes and to coordinate a corporate response to them
2. Ongoing meetings have been held with DWP about change to Universal Credit and go live date for Universal Credit for a limited cohort is 14th December 2015. Budget and digital support has been commissioned from the third sector to support Universal Credit claimants. Timing for more advanced roll out in Brighton and Hove expected between Summer 2017 and September 2018.
3. Information is provided to inform housing and children's services colleagues re changes to benefit cap policy and impact on funding of temporary accommodation. Analysis of impact of the changes to the benefit cap in 2016 has been done and a joint strategy to minimise the impact of these changes is being planned across services.
4. Council Tax Reduction (CTR) policy options provided to members to give the option to partially mitigate impact of Tax Credit changes on local CTR costs as part of CTR yearly process. Consultation has been undertaken and reports authored for committee and council.
5. Provide caseworking support directly to customers most significantly affected by the changes (specifically the benefit cap)
6. Regular links maintained with advice and voluntary sector so impacts on citizens can be judged
7. Modelling of specific policies being undertaken to assess the impact on customers in terms of numbers and change.
8. Feeding into other relevant council work streams, for example actions around the CESP and the communities prospectus from 2017

Second Line of Defence Corporate Oversight:

Welfare Reform meetings at CMT level booked in to track these changes and enable a corporate response, this incorporates a detailed risk register with progress of actions reviewed at programme boards.

Third Line of Defence Independent Assurance:

None

Reason for Uncertainty of Effectiveness of Controls: It is not possible to project accurately the number of families who may require extra assistance from the council, either in terms of housing need or increased demand for other services. Previous experience suggests that some claimants find a way to close income gaps, but the position is not fully understood.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Benefit cap reducing to £20k - November 2016	Welfare Reform Programme Manager	70	30/10/17	01/06/15	30/10/17
Comments: Precise measures now known, £20k Implementation date only vague Autumn 2016 Probable caseload identified Action plan in development with Housing colleagues Discretionary Housing Payment (DHP) position not clear but some increase in funding expected					

Workshop held 15th October with colleagues from Housing, Children's Services, ASC, CVS, Advice services to develop cross services approach to benefit cap.

Initial meetings held with DWP to plan for practicalities of implementation

Feb 2016: Waiting for Welfare Reform and Work bill to complete passage through Parliament.

Work continues with Housing and Children's services to implement action plan

March 2016:

Exact timing of implementation of £20k cap still not known, meeting held with member of project team from DWP and still slotted for 'Autmn 2016'. As such this solution Risk Action title has been extended until December 2016

DWP allocation for 16/17 confirmed, £170k increase on 15/16. The full year impact of the new cap is estimated to be between £2m and £3m.

Specific project meeting to address the cap now formed

Specific HOS meeting with colleagues from Housing and Children's services in place

Specific action plan to address the impacts now in first draft

Risks for implementation and possible budget pressures being fed up through Welfare Reform Programme Board 10th March

July 2016 - Project approach in place to deal with increased caseload, resources identified to increase capacity of the team and report due to DMT to ask for permission to recruit.

Report on the expected risks from Ben Cap (and other reforms) gone to ELT and Leadership Group. Training for members on the changes to be rolled out.

Letter from DWP received 21st July confirming roll out of benefit cap would begin from 7th November 2016 and take place over a number of weeks.

October 2016

Further details of rollout received, all current claims - approx 100 - will have the new cap applied from 7th November, new cases - approx an additional 580 - are preliminarily due to have the cap applied w/c 19th December although according to DWP this date could slip depending on how the roll out in the rest of the country goes so we are not treating it as confirmed yet. The full year effect in terms of the amount Housing Benefit will be reduced by is now at £2.1million. The Discretionary Housing Payment budget has been re-profiled to take into account this new information. This information has been fed into budget planning across services.

New burdens funding has also been received from DWP to provide extra support for managing this change. A proposal to expand the ben cap team to deal with the larger numbers using the new burdens funding was submitted to F&R DMT in September and agreed. Recruitment has taken place with new members of the team starting 24th October. We are also in discussion with JCP about co-locating a member of JCP staff on the ben cap team.

Outreach is underway to customers affected following on from Job Centre Plus communications about the changes.

The end date for this item has been extended. It was previously set to 31st December 2016 to reflect that this is when the provision was due to be fully rolled out. It has now been extended until Oct 2017 which is the date we have confirmed funding in place to work with customers affected by this change.

January 2017

A Job Centre Plus work coach has been embedded with the Benefit Cap team for a period of six months.

Existing benefit cap cases had the new amount of cap applied from 7th November, new cases were notified to the council in January and the deductions are being applied to their Housing Benefit claim. So far approximately 450 cases have the cap applied which is lower than the DWP estimate of 680 cases however the value of the cap per cases is greater. The DWP have indicated they are still checking the details of some cases which may be potentially capped so we may be notified of more capped cases over time. The benefit cap team are working with the customers affected by the cap as expected.

Keep relevant staff and stakeholders up to date with information as it becomes available	Welfare Reform Programme Manager	70	01/12/17	01/06/15	01/12/17
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Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
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Comments: Programme governance in place (Senior level, operational level, City Wide Partners level) in place and meetings happening as planned. Members briefed as appropriate through various channels. Key updates have included details and key impacts of July 2015 budget measures and CTR issues.

Information provided to relevant services (largely Housing and Children's services) about policy changes which are likely to have direct service impacts and create budget pressures.

Communications plan set out and put in place to deal with changes starting in 2016 and 2017. Newsletter for professionals produced and briefings being given to relevant services across the city.

January 2017

Internal operations group and city wide are now focussed on issues surrounding the full roll out of universal credit. A separate meeting will be organised with Registered Social Landlords who operate in the city. Briefings are being held with relevant services and organisations across the city to brief them of the changes, for example children's centres, health visiting teams and private landlords groups.

This action has now been extended until December 2017 to reflect the fact that the full roll out of Universal Credit is due to start in the city in October and November 2017.

Prepare for Universal Credit (UC)	Welfare Reform Programme Manager	70	01/12/17	04/05/15	01/12/17
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Comments: Further meetings with DWP re rollout of Universal Credit (UC) in place. Council will commission some support services for people on UC (funded by DWP). Housing have own action plan re direct payments of rent. Revenues and Benefits are required to undertake some business process changes. Rollout of UC planned for 14th December 15, project underway to enable required business changes in revs and bens; and, project underway to commission budgeting and digital support for people on UC (funded by DWP, commissioned by council). Rollout of UC complete. Systems in place within the Revenues and Benefits service and Housing services to manage functionality change. Contract in place to commission Moneyworks to provide digital and budgeting support to claimants of UC.

Contract with Moneyworks to be managed through until Mar 2017, impact on customers' ability to pay rent to be monitored and responded to over this time.

July 2016 - Government have released a revised timescale which put back the completion of UC by a year to 2022. There is no information available about when Brighton & Hove may undergo full rollout other than it is expected that all new claims for working age people will be for Universal Credit by September 2018.

The delayed rollout will have implications for other services and their medium term business planning including revs and bens and housing. This information has been shared with those services.

January 2017

The Government have now published a detailed timetable for the roll out of Universal Credit. From October and November 2017 all new claims for working age people in Brighton and Hove will be made for Universal Credit. This will include families, people with young children, and people with issues relating to health and disability.

Work is required to prepare services for this change and the scoping phase of this project is underway which largely involves gathering information from services about the impact of this. There will also be a need to recommission budgeting and online support for Universal Credit claimants. This will be funded by the DWP but commissioned by the Council. A report is due to go to ELT setting out the main risks around the introduction of UC and the organisations readiness to deal with it.

The end date of this action has been extended to 01/12/17 to reflect full roll out dates of Universal Credit.

February 2017

Scoping has been undertaken with different service areas including Rev and Bens, Housing, Children's Safeguarding and Care, Adult Social Care. Meetings of operational managers are underway to plan mitigations for the identified risks.

Additionally information has been requested of colleagues and stakeholders in the city who are not part of the Council. This has been done via the welfare reform city wide meeting which contains representatives of social and private landlords, the advice sector and CVS.

Indicative but not final figures have been provided by DWP for funding of local budgeting and online support requirements.

A report is due to ELT on 8th March setting out the main risk areas and the proposed approach to mitigations. Further to this a meeting will be held with senior colleagues from relevant services on 25th April. Meetings with operational managers will continue and form the core delivery group for the actions attached to this work.

Last Updated: 20/02/2017

Provide policy options and author reports to give members options on policy issues Eg Council Tax Reduction	Welfare Reform Programme Manager	75	31/03/17	01/04/15	31/03/17
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Comments: Council Tax Reduction Report due to P&R and Council in December - on track
Welfare Reform Report due to NCE committee November - on track
May have to review DHP policy later in the year which will require committee report
CTR report on schedule; NCE report completed
CTR governance completed, decision made by full Council Dec 16
DHP policy reviewed, no requirement to take report back to committee as current policy allows Universal Credit to be encompassed.

The CTR scheme must be reviewed each year before 31st January even if no changes are proposed to be made to the scheme.
July 2016 CTR review process for 2017/18 underway. Due to be completed by 31/03/17

Oct 2016

CTR process underway, consultation on possible changes opened in September and will close at the beginning on November.

Report due to go to P,R&G on 8th December

January 2017

Report has gone through P,R&G and Full Council and changed agreed for the scheme from April 2017. Systems testing on year end software is underway. Letters are scheduled to be sent to customer affected giving them advance notice of the changes and inviting them to apply for discretionary funds in Mid-Feb. Technical changes to scheme documents will be made before the end of the financial year.

Report data to programme board on the effectiveness of the caseworking support in place to help the most significantly affected by the Welfare Reforms. Eg trend analysis, financial impact	Welfare Reform Programme Manager	100	31/03/16	01/04/15	31/03/16
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Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: Previous programme board (PB) cancelled, next PB due in December where progress will be reported December PB was also cancelled due to a number of staff having left BHCC, however a meeting was held with the corporate owner of SR24 and the SRO of the welfare reform programme to review the analysis of the caseworking so far. The work is on track and the approach is showing considerable benefits in comparison with national trends. Feedback received and a full business case based on this evidence for the continuation of the programme will be presented by the end of March.</p> <p>PB did not go ahead due to staff changes within the organisation but a meeting was held with the owner of SR24 and the SRO for welfare reform to review the progress made. Feedback received which has been incorporated into a business case for 17/18</p>					
<p>The library service is leading digital inclusion for the council. We are working with this project around digital support for claimants of universal credit, this will include an analysis of current staff skills. There is also a need to identify specific support for UC claimants and fund this through DWP funding streams.</p>	Welfare Reform Programme Manager	100	14/12/15	01/04/15	14/12/15
<p>Comments: Project to commission digital support for people claiming UC underway</p> <p>Project to commission digital support completed, digital support for people on Universal Credit will be provided by Moneyworks</p>					
<p>The programme maintains a detailed risk register which is reviewed quarterly.</p>	Welfare Reform Programme Manager	75	31/03/17	01/04/15	31/03/17

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: Next meeting due September 2015; previous meeting due Sept cancelled, next meeting due December 2015 and will be reviewed there. PB in December also cancelled due to a number of staff having left bhcc. In its place a meeting was held with the corporate owner of SR24 and the SRO of the welfare reform programme to review the risk log.</p> <p>The welfare reform programme has been extended for a year, therefore this solution has been extended until 31st March 2017</p> <p>Risk log reviewed with SRO for WR August 2016.</p> <p>The Government have stated there will be no new welfare reforms outside those already announced under the current government.</p> <p>January 2016</p> <p>Risk registered to be reviewed with SRO for welfare reform January 2017</p>					

First Line of Defence: Management Controls

Well-resourced procurement function to ensure that appropriate and legally robust commercial delivery options are chosen and robust contracts are in place.

Robust contract KPIs in place so that contract performance and risk are understood.

Second Line of Defence: Corporate Oversight

Well-resourced corporate contract management oversight function to train and challenge contract managers and commissioners.

Third Line of Defence: Independent Assurance

Internal Audit