

# **Brighton & Hove City Council**

Strategic Risk Focus report for

Audit & Standards Committee 10 March 2020

SR15, SR21, SR26, SR24 and SR29

*Print Date: 19-Feb-2020*

### Initial Rating

		IMPACT				
		Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
LIKELIHOOD	Almost Certain (5)	0	0	0	40	0
	Likely (4)	0	0	1	0	0
	Possible (3)	0	0	0	4	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	0	0	0
	Possible (3)	0	0	4	0	0
	Unlikely (2)	0	0	0	1	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	Not keeping children safe from harm and abuse	Acting Executive Families, Children & Learning	BHCC Strategic Risk, Legislative	12/02/20	Threat	Treat	Amber L3 x 14	Amber L2 x 14		Revised: Uncertain

#### 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 partnership, from Sept. 19 it is now the Brighton & Hove Safeguarding Children Partnership (BHSCP), which oversees work locally and in partnership with Police, Health and social care providers. Despite a 20% reduction since 2015 the numbers of children in care and those on Child Protection Plans remain higher than in similar authorities. Relecting the national picture the number of children and young people (CYP) who are vulnerable to exploitation 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

First Line of Defence: Management Controls

1. Robust quality assurance processes embedded and reported quarterly to Directorate Performance Board and onto the Corporate Safeguarding Board twice a year
2. Single access point ('Front Door for Families') for support and safeguarding issues relating to children operated from May 2017. The service is a multi-agency and has responsibility for and oversight of both the Multi-Agency Safeguarding Hub (MASH) and early help referrals to provide robust risk

assessments and information sharing between partner agencies

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

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

5. The directorate has full engagement with the BHSCP

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

7. The local Troubled Families programme targets support to the most vulnerable families

8. Continuous professional development (CPD) and training opportunities offered by the BHSCP and good multi agency take up of training; and in house CPD offer

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

10. Threshold document, agreed by all agencies and reviewed regularly (last reviewed in 2018)

11. Relationship based model of practice operates for social work teams, with Pods (social work teams) in place to provide stability to service users

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

14. Adolescent Vulnerability Risk Meetings held fortnightly to consider individual cases where it is considered there is a higher risk of exploitation

15. Robust performance framework in place with quarterly Performance Boards, chaired by the Acting Executive Director to ensure robust service delivery.

#### Second Line of Defence: Corporate Oversight

1. Early Help system redesigned in 2017 and new structure in place

2. Safeguarding Quality Assurance within the city and also across key agencies monitored by the BHSCP Monitoring & Evaluation Subcommittee, meets quarterly

3. Corporate Parenting Board meets quarterly with opportunity for cross-party members, including Heads of Service, Assistant Directors and the ED FCL, to receive information on children in care and children leaving care

4. Reports delivered to BHSCP. following robust auditing of multi-agency case files and safeguarding practice

5. Cross directorate Annual Practice Week developed where senior leaders meet with front line staff to discuss individual cases, picking up best practice examples of positive impact plus discussing any barriers faced by both workers and families

6. Council appointed VVE co-ordinator who reports regularly to the Community Partnership

#### Third Line of Defence: Independent Assurance

1. Ofsted inspected our social work arrangements in July 2018, the overall judgement was 'Good' and an action plan has developed to take forward recommendations, most recently reported to CYP Committee in November 2019

2. The audit of Front Door for Families in August 2018 gave us Reasonable Assurance

3. Yearly discussion between the Ofsted Regional Director (RD) and each local authority (LA) Director of Children's Services (DCS) in the region through an 'annual conversation'. This was held on 1/4/19 it covered both social care and education, including Early Years and Further Education & Skills

4. From January 2020 the Local Government Association (LGA) will review Early Help processes and join with Safeguarding, and Front Door provision for Families.

Reason for Uncertainty in Effectiveness of Controls: The city council has arrangements in place to manage this potential risk which are regularly reviewed; however, despite efforts there are no guarantees that there will not be incidents.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Continue to provide the family coaching offer from the Integrated Team Around the Family & Young People (ITFYP) to the most vulnerable families.	Integrated Team for Families Manager	50	31/03/21	01/04/19	31/03/21
<p><b>Comments:</b> “The existing family coaches are continuing to focus on working with vulnerable families just below the social work level. Cases are referred from the Front Door for Families to the ITF and Parenting Manager who triages all cases. In July 2019 there was a waiting list of 22 cases. Most cases are not eligible for the Troubled Families Programme as they have been worked with in the past. An audit of cases for 2018/19 has been completed and published. There are also two Family Coaches who support Young Carers. From April a new team of Primary Family Coaches was established using the Earned Autonomy funding to pilot preventative work with families at a lower level of need. There is a waiting list of 12 families for these cases.</p>					

High quality social work is provided to ensure that Children & Young People (CYP) are effectively safeguarded	Assistant Director - Children's Safeguarding and Care	75	31/03/21	01/04/16	31/03/21
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**Comments:**

Progress to date:

The Ofsted Inspection of Local Authority Children’s Services (ILACS) in July 2018 provided an overall judgement of Good social work provision being provided for children and families. Quality assurance activity in Q3 19/20 indicates that compliance against standards for key practice areas is mostly good overall - 100% of cases audited meet the standard around risks, needs and strengths and in 100% of cases there is evidence of management oversight at an appropriate level for the case. In 55% of the cases further work is required to achieve good outcomes for children, this includes cases that have recently been opened and it is too soon to judge outcome, while in 45% outcomes for children overall are good and for looked after children they are stable. Partners in Change Hub has been developed with partners and launched in Q3. This will support the delivery of social work across the city and incorporate multi agency staff . The social work workforce remains stable with a low vacancy rate, and we have not had any agency social workers in post since September 2017. This has provided continuity and consistency for children and their families and further supported relationship based social work.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>The Brighton &amp; Hove Safeguarding Children Partnership (BHSCP) will continue to monitor safeguarding delivery across all agencies in the city to ensure effective safeguarding is in place.</p>	<p>Acting Executive Families, Children &amp; Learning</p>	<p>50</p>	<p>31/03/21</p>	<p>01/04/19</p>	<p>31/03/21</p>
<p><b>Comments:</b> The Brighton &amp; Hove Safeguarding Children Partnership (formerly the LSCB) launched its new safeguarding arrangements on 29/9/19. A Steering Group comprising of the below meets quarterly.</p>					
<ul style="list-style-type: none"> <li>• The nominated officers for the three lead safeguarding partners</li> <li>• The independent scrutineer</li> <li>• The designated professionals for the 3 lead safeguarding partners</li> <li>• The chairs of the BHSCP subgroups</li> <li>• A representative from the Community Safety Partnership (CSP)</li> <li>• A professional to represent schools and early years</li> <li>• People with expertise (including members of the Youth Reference Group) if required to discuss specific issues.</li> </ul>					
<p>This group will be responsible for the following:</p> <ul style="list-style-type: none"> <li>• Analysis of multi-agency statistics, performance measures and outcomes</li> <li>• Scrutiny of reports</li> <li>• Section 11 self-assessments and challenge events</li> <li>• Practitioner and partnership challenge events</li> <li>• Oversight of Child Safeguarding Practice Reviews (CSPRs)</li> <li>• Developing &amp; overseeing the overarching strategic aims of the BHSCP</li> </ul>					
<p>The Steering Group are current developing the overarching strategic aims of the BHSCP. An annual programme of multi-agency thematic auditing to test the effectiveness of local safeguarding arrangements is already in place and will remain in place. Learning audit activity fed will continue to feed into the BHSCP learning and development offer and cascaded across the safeguarding partnership. A multi-agency audit looking at recognition and responses to child exploitation is underway and due for completion in October 2019. This is supported by the (Quality Assurance Programme Manager, BHSCP).</p>					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR24	The impact of Welfare Reform increases need and demand for services	Acting Chief Finance Officer, Revenues & Benefits Manager	BHCC Strategic Risk	12/02/20	Threat	Treat	Amber L4 x I3	Amber L3 x I3		Revised: Uncertain

Causes  
Introduction of Universal Credit during 2015/16 with extended roll out during 2016 and thereafter. Implications for staffing levels within services; rent collection; council tax collection, and pressures on social services and homeless services.  
In Brighton and Hove, Housing Benefit claimants are gradually moving across to Universal Credit (UC), where there is a new claim or a change of circumstances. A migration of remaining cases will occur between 2019 and 2023.

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. Our Welfare Rights, Welfare Reform and Discretionary Help and Advice teams monitor welfare changes and coordinate a corporate response to them
2. Ongoing meetings are held with Department for Works Pensions (DWP) about change to Universal Credit (UC) and how we respond to vulnerability
3. Council Tax Reduction (CTR) rules can be set and changed by the council. They have been reviewed for the 2020/21 year, but there will be no changes to the scheme in that year. However, the budget for additional discretionary help with Council Tax Reduction has increased by 33% from £0.15m to £0.2m. The budget for 2019-20 is projected to be fully spent before the end of the year
4. Our other discretionary funds have already exceeded their budget allocations in 2019-20, as at January 2020 (Discretionary Housing Payments and Local Discretionary Social Fund)
5. We are considering new Council Tax Reduction schemes for future years, aimed at further simplification
6. Provide caseworking support directly to customers most significantly affected by the changes, eg benefit capped, or contesting a DWP benefit decision, or being given benefit advice and support
7. Regular links maintained with advice and voluntary sector so impacts on citizens can be judged eg through the Advisory Services Network.

#### Second Line of Defence Corporate Oversight:

We are in the process of setting up a new Welfare Board, to develop a joined up response across all relevant services. It will be chaired by the Interim Executive Director of Housing, Neighbourhoods and Communities  
Executive Leadership Team (ELT) Full Council, P&R are all focused on this risk.

#### Third Line of Defence Independent Assurance:

Internal Audit - Audit took place over the end of 2017/beginning of 2018. Final report issued Feb 2018 Substantial Assurance. 2018/19 . Welfare Reform (Substantial Assurance).

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.

<b>Risk Action</b>	<b>Responsible Officer</b>	<b>Progress %</b>	<b>Due Date</b>	<b>Start Date</b>	<b>End Date</b>
Benefit cap - casework support programme to support people affected by the benefit cap	Revenues & Benefits Manager	70	31/03/21	01/06/15	31/03/21



Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> 1. Team helps people who have been Benefit capped to find work/access training and support / claim relevant benefits and assistance in order to come off the Benefit Cap</p> <p>2. Work is ongoing, because new people are capped all the time. However, before Universal Credit, we had advance warning of who would be capped because it would require their Housing Benefit to be cut. Now, the Benefit Cap is applied directly by the DWP to Universal Credit, and we only find out if individuals present to us.</p> <p>3. JobcentrePlus work coach embedded within Bencap team - joint working to resolve cases</p> <p>4. Discretionary Payment scheme supports people to pay their rent in the short term, while we support them to come off the benefit cap or find work</p> <p>5. Team is building links with local Jobcentres so that Universal Credit cases can be referred over to the council for support, if they are benefit capped.</p> <p>6. Discretionary Housing Payment expenditure for 2019-20 Benefit Cap cases is projected to be £300k</p> <p>7. Funding for the team has historically been confirmed only on a year-to-year basis, although part of the function is now mainstreamed into the Revenues and Benefits structure. The team is funded for 2020-21.</p> <p>8. Work will continue throughout 20-21, so the risk end date has been extended to 31/03/21. The risk percentage remains the same because we have less control in the Local Authority (LA) over our caseload than we used to. The DWP does not provide us with lists of people on UC who have been benefit capped, so it is harder for us to identify them.</p>					
Keep relevant staff and stakeholders up to date with information as it becomes available	Revenues & Benefits Manager	75	31/03/21	01/06/15	31/03/21

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Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> The new Welfare Board will set out structure and strengthen links. We have established working relationships on an operational level, linking key teams in Revs and Bens with others involved with supporting vulnerable people in maximising their finances, and maintaining their tenancies, for example Housing Income management, Housing options, Trailblazer, Adult Social Care, FIS. We also have strong links with the local Jobcentre Plus via our DWP partnership manager, Jobcentre managers and work coaches.</p> <p>Our Welfare Rights Team reaches out via the Advisory Services Network into the voluntary advice sector and provides training for council teams and external advisors.</p> <p>Risk end date extended, because the government timetable for welfare reform (specifically UC) has extended. Work will continue throughout 2020-21 and beyond.</p>					
Prepare for Universal Credit (UC)	Revenues & Benefits Manager	70	31/03/21	04/05/15	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> Universal Credit is now rolled out in Brighton and Hove for new claims for working age people, but this is not the full picture. Existing Housing Benefit claims are gradually being ended, as and when a person makes a new claim for UC, or has a change of circumstances. As at December 2019 12,499 claimants are on UC across Brighton and Hove. This is a gradual climb from 11,300 in August 19. Housing Benefit caseload continues to reduce, but there is high demand for support with challenging DWP decisions.</p>					
<ul style="list-style-type: none"> <li>• The government intends to migrate remaining cases in bulk, between 2019 and 2023. They have not set a timetable, so we do not know when Brighton and Hove will migrate, but we do know that the DWP is adopting a very cautious approach at first. They have been piloting managed migration in Harrogate since July 2019, but as at mid January 2020, they had only moved 13 cases onto Universal Credit. There is currently no feedback from the DWP or Harrogate about what they have learnt or how it will scale up.</li> <li>• Ultimately, some cases are to remain on Housing Benefit, such as pension age, temporary accommodation and supported accommodation. A further migration may happen at a later date after 2023 but we do not have information about that.</li> <li>• The UC project in Brighton and Hove maintains a monitoring brief, and links up services strategically inside the council, in the Community and Voluntary Sector and with other interested parties in the city (for example landlords in the private sector and Registered Social Housing).</li> <li>• We have advanced DWP joint working embedded in our Benefit Cap / Welfare Reform team, and as an ongoing outcome of the Housing Trailblazer project. And at a strategic level we co-ordinate with our DWP partnership manager, alongside the CVS to monitor our response to UC, and to identify issues of local or national significance.</li> <li>• We are part of a Complex Needs Stakeholder forum hosted by the DWP to identify ways of assisting people who have difficulty accessing UC.</li> </ul>					
<p>Risk end date extended to 31/03/21, because the government timetable has slipped and managed migration of UC is unlikely to happen in 2020.</p>					
Provide policy options and author reports to give members options on policy issues e.g. Council Tax Reduction	Revenues & Benefits Manager	70	31/03/21	01/04/15	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> We are in the process of setting up a cross-service Welfare Board, which will require as part of its inception a plan for governance and reporting. The board is expected to be set up by March 2020. We are also part of a new project with the Local Government Association (LGA) working alongside five other Local Authorities to develop our response to providing financial support.</p>					
<p>Whereas in previous years, members have been involved with proposals to change Council Tax Reduction, this year, there will be no changes to the scheme, except that the discretionary fund for extra assistance will be increased from £0.150m to £0.200m. A report was taken to P&amp;R in December outlining our broader plans for developing our financial support offer, incorporating the welfare reform agenda. A progress report will be taken to P&amp;R in the coming months. We are continuing to explore some different models of CTR support more thoroughly, including banding schemes with set percentage amounts of discounts. Development is expected to continue through the year. Options will be prepared for April 2020, with a view to consultation in late summer 2020, and progression through committee and full council in time for implementation in April 2021. Our response to welfare support will also be reviewed and mapped as part of the work of the board, and new models of providing financial support will be explored, with assistance from the LGA.</p>					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR29	Ineffective contract performance management leads to sub-optimal service outcomes, financial irregularity and losses, and reputational damage.	Acting Chief Finance Officer, Procurement Strategy Manager	BHCC Strategic Risk, Contractual / Competitive	12/02/20	Threat	Treat	Amber L3 x I4	Amber L3 x I3		Revised: Adequate

Causes

Link to Corporate Plan: Outcome ' A modern council: Providing open civic leadership and effective public services'

The City Council has recognised weaknesses and sometimes serious failures in contract performance management; there are over 200 contract managers throughout the council, of which less than 20% could be considered as 'professional'. Many of those identified manage contracts only as an 'add on' to their regular job, often they are not budget holders. To address this additional funding has been provided to maintain the core Corporate Procurement Team expertise, deliver a risk based and spend analysis approach which focuses on key contract areas (HASC and FCL). Savings achieved by Contract Performance team are as follows;-

2017-18 £600K

2018-19 £0.95M

2019-20 £1.2M (Identified not all secured)

This represents a 5 to 1 return on the £1.1M investment (pro-rata) 2017-2020. In order to deliver sustainable culture change and improve efficiency we must continue to address:

- Historical sub-optimal contract specification.
- Initial failure to identify options for delivery, including reverting to 'what we've always done.'
- Lack of willingness to test existing suppliers against the market.
- Significant reduction in resources in 'back office' functions and services reducing capability to effectively manage.
- Lack of commercial skills and contract management skills / expertise throughout the authority combined with treating Contract Management as an 'add-on' to normal duties.
- Failure by management to recognise the importance of an effective contract Management team.
- Lack of willingness to hold 'difficult conversations' with suppliers.
- Low levels of senior engagement with suppliers.
- Poor understanding of markets and delivery models.
- Lack of corporate oversight of contracting and commissioning.
- Ongoing resource pressures in Procurement means this risk still exists. As demand increases, the reducing ability of the Procurement and Contract teams.

Performance to plan rather than react may mean that contracts 'fall through the net'.

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Potential Consequence(s)

1. Investigations in to current contracts (62 completed, 64 in progress) have identified up to 80% are potentially delivering poor Value for Money (VfM), inefficiencies, inconsistent levels of management and failure to . Major concerns remain in the following areas:

a) Health & Adult Social Care: this has been the main focus of the Contract Performance Team in the last financial year.

b) City Clean / City Services (incorporating Highways, Transport, Environment etc): a large number of contracts have been identified as lacking in effective Contract Management.

c) Housing Maintenance: as the contract is winding down it is anticipated that the service will attract less investment from the existing provider. This will need to be managed to ensure we maintain value for money. Additional investigations are necessary in to other contracts, such as, Lift Maintenance, Gas maintenance and other services.

2. Legal challenge from suppliers / service users.

3. Reputational damage for the council - both the administration and officers.

4. Poor outcomes or failure of services and associated impact on service users.

5. Diversion of scarce resources to resolve issues, currently resolution is only being performed by a small number of Contract Managers and through intervention of the Contract Performance Team.

#### Existing Controls

##### First Line of Defence: Management Controls

1. Utilise procurement function to ensure that appropriate and legally robust commercial delivery options are chosen and robust contracts are in place.

2. Robust contract Key Performance Indicators (KPIs) in place so that contract performance and risks are understood.

3. Contract Standing Orders and other procurement guidance and training.

4. Declaration of Interest Processes.

5. Relevant paragraphs of the Employee Code of Conduct.

6. Fraud Awareness Training/ e-learning.

##### Second Line of Defence: Corporate Oversight

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

2. Progress reviewed by Corporate Modernisation Delivery Board (CMDDB), Members Oversight Group and Members Procurement Advisory Board (PAB)

3. Audit & Standards Committee Strategic Risk Focus Item reviewed this risk in March 2018 and in March 2019

##### Third Line of Defence - Independent Assurance

1. Internal audits of contract management during 2017/18 were Strategic Construction Contract (Substantial Assurance), Contract Waivers (Substantial Assurance) and Lift

Maintenance Contract (Substantial Assurance).

2016/17 audits were Waivers (Limited Assurance), Housing Electrical Works (Limited Assurance).

2015/16 audits were Corporate Procurement (Reasonable Assurance), Gas Servicing (Reasonable Assurance), Housing Repairs & Maintenance (No Assurance), Financial Appraisals (Limited Assurance).



Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Continue to identify changes in staff structures to ensure that contract managers are identified, understand their role and deliver to the standards expected by the Council	Executive Director of Finance & Resources	60	31/03/20	14/03/19	31/03/20
<p><b>Comments:</b> Procurement has a database of contract managers which is periodically updated every six months against contracts owned by budget holders.</p> <p>Reports from finance system is available re budget holders and CP Team ask them for verification that the contract managers are still in place or any changes in staff.</p>					
Full Council approval for £1.2m investment in Contract Management resources approved on 23 Feb 2017 at Budget Council. This has provided 9.5 fte resources including legal support to ensure the set up of a Contract Management 'Centre of Expertise'.	Executive Director of Finance & Resources	65	31/03/20	07/04/17	31/03/20



Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> - Recruited extra staff.</p> <ul style="list-style-type: none"> <li>- Created a pipeline for all material contracts that allows us to plan procurement activity at the right times to take the cashable savings.</li> <li>- Worked with Orbis colleagues to identify risks around weak markets.</li> <li>- Risk-rated all material contracts to identify where there are problems, including with contract management.</li> <li>- Worked through material Adult Social Care contracts.</li> </ul> <p>Ongoing activity now includes:</p> <ul style="list-style-type: none"> <li>- Using a pipeline and RAG ratings to deliver:</li> <li>- Regular management information to Procurement Advisory Board (PAB) and ELT on how contracts are performing. (start date Sept 2019)</li> <li>- Specific interventions where extra support is required (e.g. CityClean, care homes, Mears).</li> <li>- Training for contract managers who need support. To date training has been provided to Housing, IT&amp;D, Leisure Services and Health and Adult Social Care. This remains an ongoing action</li> <li>- Create a network of contract managers to ensure that best practice and even an element of competitiveness to do well emerges. Orbis have created an online contract management community, all relevant B&amp;HCC staff have been invited to join.</li> <li>- Split further our savings plans between cashable and cost containment – social care markets in particular are very fragile and costs are rising, so we are doing well to stand still.</li> <li>- Review of how to take function forwards in lught of limited funding from  pril 2020 - Head of Procurement will work with individual Exec Directors.</li> </ul>					
Initiate mandatory contract management training linked to contract management e-learning	Executive Director of Finance & Resources	10	31/03/21	14/03/19	31/03/21
<p><b>Comments:</b> The e-learning modules have been introduced in April 19 which is targeted at all contract managers. A report has been prepared for ELT but the submission date is tbc. The report will propose a) mandatory contract management training, including groups sessions by service area b) contract officers will be required to have to completed the e-learning before attending which will be monitored c) the Procurement Team will report attendance to ELT.</p>					
Publicise importance of contracts being well managed and the development of contract management where performance has not met expectations	Executive Director of Finance & Resources	50	31/03/21	14/03/19	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> From October 2019 the CP Team will contact management information to ELT with the aim of cascading to service areas. This will identify areas for improvement and successful practice. Pilot document being reviewed.</p>					

## Risk Details

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR21	Unable to manage housing pressures and deliver new housing supply	Interim Executive Director Housing, Neighbourhoods & Communities, Head of Planning, Assistant Director Housing	BHCC Strategic Risk, Environmental / Sustainability	12/02/20	Threat	Treat	 L3 x 14	 L3 x 13		Revised: Adequate

Causes

Link to Corporate Plan: Priority Economy, Jobs and Homes: Deliver better business space and affordable homes/accommodation  
 Brighton & Hove is a growing city with high house prices, low incomes, an ageing population and a significant proportion of households with a support need. Scope for development within the city is affected by significant geographical constraints and competing land pressures. The increasing demand for housing continues to outstrip new supply and as a consequence accommodation is becoming less affordable. Housing shortages are particularly acute for low income households affecting our ability to retain essential workers in the city. Demand for affordable rented homes is growing with a significant number of households in temporary accommodation. The private rented sector continues to expand at the expense of rates of owner occupation which are in long term decline.

Potential Consequence(s)

1. Changes in Government legislation require council intervention to prevent homelessness at an earlier stage.
2. The city is constrained in its capacity to accommodate economic growth, housing supply obligations and sustainable development objectives.
3. The city council is unable to meet its strategic housing and planning policy objectives to: meet City Plan and Housing Strategy requirements in terms housing numbers; improve overall housing supply and housing mix; deliver affordable lower cost homes, in particular homes for rent.
4. The city council is unable to meet statutory homelessness obligations. In particular, corporate critical budget implications arising from Temporary Accommodation pressures owing to lack of suitable alternative accommodation and overall need to reduce the use of Temporary Accommodation.
5. The shortage of homes to meet the accommodation requirements of elderly and vulnerable people which can have an adverse impact on social care provision and cost pressures on both social care and Health.
6. Impact on our ability to recruit and retain lower income working and younger households and employment in the city, in particular in social care, health and other lower wage sectors.

#### Existing Controls

##### First Line of Defence: Management Controls

1. Housing Work Plan 2019-2023 agreed at Housing Committee on 18 September 2019 with reports on progress to be taken to every other committee. Progress is also subject to regular review against delivery within business plans e.g. HNC Directorate Plan and Service Plans;
2. The City Plan also sets out housing targets across all tenures; policies on securing affordable housing through the planning system, residential development standards;
3. Housing Revenue Account (HRA) Asset Management Strategy is aligned to Housing Strategy in support of improving housing supply & housing quality which is in alignment with the Housing Committee Work Plan;

##### Key controls include:

1. Housing Allocation Policy framework ensuring best use of existing council and registered provider resources through nomination of affordable housing to priority households.
2. Deliver 800 additional council homes - 2019-23. Includes:
  - a) New build council homes under our New Homes for Neighbourhoods programme;
  - b) Homes purchased under our Home Purchase Policy;
  - c) Improving supply through best use of existing HRA assets including conversions and extensions and the hidden homes programme;
  - d) Work in partnership with Community Land Trust to support community housing initiatives.
3. Deliver 700 other affordable homes - 2019-23. Includes:
  - i) Enabling delivery of new affordable homes in partnership with Registered Provider partners and Homes England;
  - ii) Development of additional Housing Delivery Options. The Living Wage Joint Venture 'Homes for Brighton & Hove' with Hyde to deliver 1,000 new lower cost homes for rental and sale. Future possibilities for housing market intervention / direct delivery through a council wholly owned housing company.
4. Increase the supply of council owned Temporary Accommodation (TA) in addition to procurement of TA and long term private sector housing lettings with private landlords for those to whom we owe a housing duty;
5. Bringing long term empty private sector homes back into use through our Empty Property Service;
6. Tenancy sustainment initiatives particularly for more vulnerable people in order to prevent homelessness;

7. Ongoing work of Greater Brighton Housing & Growth initiatives to share good practice and accelerate delivery of new homes;
8. On-going work of the Greater Brighton Strategic Property Board; bringing national, regional and local partners together to make the best use of the combined public estate – including the release of surplus land and sites for economic growth (new jobs, employment floorspace and home);
9. Early intervention through the homelessness trailblazer programme and funding to support households into the private rented sector.

Second Line of Defence: Corporate and Committee Oversight

1. The Housing Committee Work Plan 2019-2023 focuses on key shared priorities around providing Additional Affordable Homes including consultation with stakeholders, resource planning and a timescale for reports to come to Committee. Performance reports to be brought to alternate Housing Committees to monitor how officers are progressing with delivery against the Work Plan.
2. Corporate Investment Board.
3. Strategic Investment Board.
4. Cross Party Housing Supply Members Board (formerly Estates Regeneration Members Board, cross party).
5. Strategic Housing Partnership (cross sector).
6. Strategic Accommodation Board (reviewing accommodation needs of vulnerable households across Housing, CS & ASC). Progress is reported in HNC Directorate Plan.
7. The risk was reviewed at A&S Committee in January 2019.

Third Line of Defence: Independent Assurance

1. Internal Audit - current activity. Ensure all Audit requirements have been actioned. Most recently 2018/19 Audit actions concern Temporary Accommodation – Partial Assurance. Actions, including reduce the budget overspend by increasing homeless prevention work and moving current tenants into private sector rented accommodation, have been agreed with management and will be followed up by Internal Audit as part of the 2020/21 audit plan.
2. Internal Audit - previous activity. June - Oct 2018 Supported & Semi-Independent Accommodation – Reasonable Assurance. No specific Internal Audit work in 2017/18. In 2016/17 on Housing New Builds concluded Substantial Assurance.
3. Ministry of Housing, Communities & Local Government information returns. Submitted annually.
4. Homes England information returns where we have HE grant allocations. Homes England grant for homeless move on accommodation – regular updates to HE on scheme progress and draw down on grant.

<b>Risk Action</b>	<b>Responsible Officer</b>	<b>Progress %</b>	<b>Due Date</b>	<b>Start Date</b>	<b>End Date</b>
Deliver Housing Work Plan	Assistant Director Housing	25	31/03/23	01/10/19	31/03/23

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> The Housing Committee Work Plan 2019-23 is incorporated in the Housing, Neighbourhoods &amp; Communities Work Directorate Plan and appropriate business plans. Regular reports on progress are made to Housing Committee and Performance reporting six monthly to P&amp;R Committee. Links to reports are available on the council's website</p>					
Effective implementation of affordable housing policy in the City Plan	Head of Planning	85	31/03/20	01/04/15	31/03/20

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> Oct 19 - Housing Delivery Action Plan put in place in August 2019. This is an action plan required by central government to address the under delivery of housing. The action plan includes measures to ensure timely decisions by the Development Management Service and close working with colleagues in the Housing Strategy Team and Estates to support delivery of affordable housing (and housing in general). Work is underway to review how independent viability advice is provided to planning application officers. A report will go to TECC Committee in January 20 and making recommendations to take this forward with a view to securing robust and timely advice and ensure the appropriate levels of affordable housing are secured.. Good progress has been made on City Plan Part Two including a policy on Build to Rent Housing. This will go forward to Council in late 19/early 20 for submission to the Secretary of State. Annual report on s106 contributions (Sept 19) confirmed that in 2018/19 that £2.8 million contribution was received towards delivery of affordable housing. Affordable Housing and Viability Training provided to Councillors in Oct 19.</p> <p>June 19 - Policy in City Plan part 1 being implemented and viability evidence submitted with planning applications is being assessed on a case by case basis. Work on introducing a range of independent viability assessors has been delayed and will be started in Summer 19. This will enable a more effective and efficient evaluation of viability work. Policy is being implemented as effectively as possible in the context of viability challenges for development on brownfield sites and changes to funding of affordable housing - this is, in most cases, delivering less than the 40 per cent affordable housing target in the policy. A review mechanism is being used in s106 Agreements to ensure that future uplift in values are being shared with the city council and go towards delivering affordable housing. In terms of direct delivery of affordable housing by the city council - the local planning authority recognises this is a priority for consideration and determination. Work is underway on securing an additional resource (planner) to leading on planning work on Estates Regeneration pre-application advice and planning applications.</p> <p>Context</p> <p>The Affordable Housing Policy is part of the City Plan which was Adopted by Full Council on 24th March 2016. The affordable housing policy sets a target for securing affordable housing as part of new housing developments (e.g. 40% affordable housing of 15 or more dwellings). There is flexibility built into the policy to allow for a lower amount where a developer can demonstrate that the target would render the scheme unviable - they are required to provide evidence to demonstrate this (a viability assessment).</p> <p>Guidance on affordable commuted sums agreed at EDC Committee in June 2016 and further guidance on when commuted sums for larger sites (15 plus dwellings) added to the Developer Contributions Technical Guidance in January 2017. Using commuted sums will enable flexibility in terms of delivering genuinely affordable housing. This is regularly monitored by the S106 Officer in the Major Applications Team and annually reported to Policy &amp; Resources Committee.</p> <p>'Open Book ' approach to viability evidence was agreed in January 18 this was introduced in Feb. 2018. This is provides more open and transparent information on why specific levels of affordable housing are being secured through the planning application process.</p>					

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Work through City Deal with regional partners &amp; LEP to promote Economic development incl increased sub-regional working to meet housing need</p> <p><b>Comments:</b> Dec 19 - Recruitment of a project lead is still underway and this will be reviewed in the new year. Work is underway to procure the background evidence to support Local Strategic Statement 3 from consultants. The tender brief will be agreed at the Planning Officer Group in January and a CEOs Meeting and Strategic Planning Board Meeting are being set up in February to consider and agree the work. No progress made and work underway at Planning Officer Group level to accelerate work.</p> <p>Oct 19 - It has been agreed that Governance of the work by the West Sussex and Greater Brighton Strategic Planning Board will be via a quarterly meeting of Chief Executives. It was also agreed that a Local Strategic Statement 3 should be prepared and that this would cover the period from 2030-2050. It was also agreed that it would address the shortfall in housing delivery, give priority to infrastructure to meet spatial priorities, develop a long term strategy to deliver sustainable growth to meet needs. In the meantime work will be undertaken to progress background evidence studies including - understanding the shortfall in housing, employment and infrastructure and developing a common methodology to seek development sites. It was agreed that a statement of common ground would be prepared across the authority. Governance arrangements to be set up - The WSCC Chief Executives (CEs) are to consider a paper on Governance at its meeting in April and this would include a discussion on aligning future Board meetings with CE/Leaders meetings (where emerging LSS3 work requires a strategic overview). The Group is working on assisting the draw down of funding from Housing Infrastructure Fund to help with housing delivery.</p> <p>Previous Updates: Following work by the Greater Brighton Housing &amp; Growth (GBH&amp;G) Working Group to accelerate delivery of new housing supply a Local Strategic Statement 2016 was developed with the sub-regional planning group to consider the wide Greater Brighton area including Surrey.</p>	Head of Planning	40	31/03/20	01/04/15	31/03/20
Work with partners to address student housing needs	Head of Planning	85	31/03/21	01/04/15	31/03/21



Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> Dec 19 - Report to TECC Committee in January 2020 confirming progress on the city wide Article 4 Direction following consultation and, if agreed by councillors, that it will come into effect in June 2020. The submission City Plan Part 2 with it's supporting policies, will now be going to Council in April 20. Collaborative working continues with close working between Private Sector Housing, Planning and other relevant Council Services at the 6-weekly PRS meetings.</p> <p>Oct 19 - Extension of Article 4 Direction to citywide on track for introduction in June 2020. City Plan Part 2 due to go to Council in January for submission to the Secretary of State in the Spring 2020 and examination in the autumn 20. This includes further policies to manage purpose built student accommodation, allocate three sites and introduce a further policy to manage planning applications for new HMOs. There will be ongoing work with the Housing Strategy Team to develop a future Student Housing Strategy.</p> <p>June 19 - Consultation underway on the introduction of a citywide Article 4 Direction following agreement to proceed at TDC Committee in January 19. Seeking direction to be confirmed in May/June 20. Development work underway on a number of purpose built student housing schemes including Preston Barracks, Circus Street, Hollingdean Road and the Lectern Site. Consent granted for new schemes that comply with planning policy and a number of schemes in pipeline. Ongoing support provided to councillors and colleagues at the regular Private Rented Sector Housing meetings and to support the Student Housing Strategy update. There remains a strong focus on enforcing against unauthorised HMOs by the Planning Enforcement Team.</p> <p>Student Housing Study technical background paper completed July 18. City Plan Part 2 draft agreed at Committee for consultation for 10 weeks from July to September. The Plan includes two proposed policies that will relate to management of student housing and allocates two further sites for potential purpose built student housing. Local Strategic Statement 3 will be prepared, starting autumn 2018, and this will explore strategic issues such as student housing. Continued working with the Strategic Housing Partnership in relation to student housing issues. Student Housing technical background paper completed and to be used to inform the Student Housing Strategy.</p> <p>In terms of managing concentration of Houses in Multiple Occupation (HMO) - City Plan policy is being implemented and where appropriate enforcement action taken against unauthorised HMOs. Proposed City Plan Part 2 policy will be proposed that will address issue of localised concentrations of HMOs. Additional resources have been given to the Planning Enforcement Team to support this work.</p> <p>Supporting purpose built student housing (PBSH) - Consent was given to Preston Barracks redevelopment in Sept 17 which will deliver 1200 purpose built student rooms. Work underway on Circus Street. Additional speculative schemes for PBSH reaching completion or underway on Lewes Road.</p>					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR26	Not strengthening the council's relationship with citizens	Interim Executive Director Housing, Neighbourhoods & Communities Head of Communications Head of Communities, Equalities & Third Sector	BHCC Strategic Risk, Customer / Citizen	12/02/20	Threat	Treat	Amber L3 x I4	Amber L3 x I3		Revised: Adequate

Causes

Link to Corporate Plan: Outcome ' A modern council: Providing open civic leadership and effective public services'  
 Potential reduced service offers by the council or its Key Partners may lead to poor perceptions from citizens  
 Not enough use, promotion or development of service delivery through technology (linked to Digital First)  
 Increased need to collaborate with other public agencies and third sector organisations to service citizens, including as a 'service of last resort'  
 How staff across the council in key frontline directorates embrace and promote the new ways of service provision to service users and citizens and forge links with others in the organisation for corporate buy-in  
 Adverse media coverage may impact on courage to make decisions; and change

Potential Consequence(s)

1. Council's offer falls behind public expectations of services access and delivery standards in comparison with other organised public services and private organisations
2. Council's offer is not well defined, practiced or understood by citizens and communities
3. Council loses relevance with its local communities
4. Less support for the council from its citizens
5. The council's leadership role may be compromised if other organisations are influenced by negative perceptions

Existing Controls

First Line of Defence Management Controls:

1. Customer Feedback, including complaints and survey methods monitor council reputation e.g. City Tracker, Media Monitoring
2. Corporate Plan 2015-2019 emphasises working with Communities
3. Front line services work to manage down demand, as detailed in the Directorate Plans for Adult Services and Children's Services
4. Health & Adult Social Care work closely with the Clinical Commissioning Group (CCG) and Public Health England to ensure planning of delivery to our residents
5. Directorate Management Teams monitor impacts on customer and services

Second Line of Defence Corporate Oversight:

1. 'Horizon scanning' by the Executive Leadership Team (ELT) and Directorate Management Teams (DMTs) of legislative change affecting council service delivery
2. Officer Steering Group (Customer Insight Group) representing 5 biggest customer service functions meets regularly to analyse impact on citizens and plan improvements
3. CCG and council work on the Health & Wellbeing (HWB) Board, including co-location at Hove Town Hall
4. Corporate Modernisation Board, chaired by Chief Executive, establishes and deploys resources to make changes most effectively in 6 workstreams related to HCN, including support from PIP on Programme Management, e.g. business cases, progress review, timetable
5. Tourism, Equalities, Communities and Culture (TECC) Committee oversight of programmes relating to the 6 workstreams in HNC.

Third Line of Defence Independent Assurance:

Internal Audit - The 2017/18 Internal Audit Plan included an audit of Public Consultations which concluded Reasonable Assurance  
In 2015/16 the audit on Organisational Ethics concluded Substantial Assurance.

<b>Risk Action</b>	<b>Responsible Officer</b>	<b>Progress %</b>	<b>Due Date</b>	<b>Start Date</b>	<b>End Date</b>
Develop customer service standards and reporting against these standards	Head of Performance, Improvement & Programmes	75	30/03/20	20/04/16	30/03/20

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> Customer Promise has been developed by the Customer Experience Steering Group consisting of services representing high transactions with the council and other key services. This has been developed in consultation with customers and Institute of Customer Service. The Promise has been launched across the organisation along with the guidance. A Vision document has been developed to clarify what a 'fully ready' state would look like in terms of delivering excellent customer service.</p> <p>Our performance against these standards gets reported in the annual Customer Insight Report and Monthly Customer Insight Dashboards are being prepared to strengthen management information. Learning from Feedback section in the dashboard gets shared across the organisation. Barriers to delivering good customer service - capacity issues within services, pace of modernisation including IT modernisation, pressing demands reducing focus on addressing customer queries/complaints. Customer Experience Ambassadors have been appointed across the council to embed key learning. Customer Strategy has been approved by the Policy &amp; Resources meeting at the 5/12/19 meeting which emphasises commitment to One Council. Customer satisfaction with BHCC as per 2018 data is at 54% against the national average of 60%. Based on Quarter 2 2019-20 data, complaints are reducing, compliments increasing and escalation of complaints reducing.</p>					
<p>Ensure through its communications and public relations activities that the council is concise about its ambitions and visions for the city, demonstrating at all times collaboration and openness with the city about how change will happen</p>	<p>Head of Communications</p>	<p>50</p>	<p>30/03/20</p>	<p>20/04/16</p>	<p>30/03/20</p>
<p><b>Comments:</b> This is a significant time for this risk.</p> <p>Work is now taking place:</p> <ul style="list-style-type: none"> <li>• with the new administration and Executive Leadership Team on a meaningful new Corporate Strategy which will need to convey that the council has a clear corporate narrative and which is clear on tangible deliverables for the city.</li> <li>• with the new administration and Executive Leadership Team to finalise the definition of, planning schedule, agreement and sign off processes on annual corporate campaign.</li> </ul> <p>Once this work is completed the Communications Team will run a series of year-long holistic communications and PR campaigns and activities with specific objectives and audiences, clear and consistent messaging and means of evaluation.</p>					

An important piece of work the Communications Team is working closely with IT&D on is the 'switch off' the council's old website with more user focused content and structure on the new website. A key piece of work will be draft a Website Strategy 2020-21 and get this signed off in order to continue the development and resourcing of the website post April 2020.

Run a resident media / information survey to better understand not only how our residents consume information, but also how they would like to, especially targeting traditionally hard to reach audiences, older people, religious communities, rough sleepers, new arrivals to the city, young people.

A holistic performance tracking system across all digital and social media channels is being designed to monitor and evaluate engagement with news and information on the council's online Newsroom and social media channels to be developed.

Work is also continuing in partnership with IT&D on the phase 2 business case for CMDB on final options recommendations, and commence design and built of staff and cllr internal communications platform.

Work has started on the 2019-20 Internal Communications and Engagement strategy and programme for senior managers, Members and staff focusing on but not limited to:

- Working with with HR&OD and the Equalities Team to develop an equalities and inclusion strategy for 2019-20
- Communicating the Corporate Strategy

Work continues to develop and increase the readership, relevance and frequency of Your Brighton & Hove a weekly resident's e-bulletin emailed directly to subscribers email accounts.

A public affairs / networking strategy has been written which aims to improve:

- The style and success of funding bids
- Relationships with key stakeholders
- The council's reputation as an innovator
- Winning awards for excellence
- Lobbying activities
- Responses to national and regional consultations

Work continues on the training offer to more councillors and an internal e-newsletter / briefing bulletin for all cllrs will be rolled out imminently.

The Communications Team will be talking with the Member Development Working Group to further capture what communications and engagement tools / resources would be useful to new councillors

Work also continues on better identifying proactive positive editorial media opportunities and making connections with the right influencers.

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Oversight and delivery of the Collaboration Framework Action Plan	Head of Communities, Equalities & Third Sector	75	30/04/20	02/10/17	30/04/20
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**Comments:** Collaboration Framework Action Plan signed off by city's Equality and Inclusion Partnership July 2018 and is a standing item at each meeting monitor progress and manages risks. At the April 2019 Partnership meeting it was agreed that during the second year of the Framework there would be six workshops every two months on each of the 6 principles to ensure the practice was embedded, creating buy-in and for organisations to pledge actions rather than carrying out 12 month review leading to a set of recommended actions. However, due to a change in priorities for the lead officer for the Collaboration Framework these workshops have been postponed and an alternative approach agreed with the Chair of the Equality and Inclusion Partnership to run a collaboration workshop at the partnership's January 2019 meeting considering how the principles of the Collaboration Framework can be used to improve the accessibility of the city.

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Volunteering Policy and delivery arrangements across council services and with Community & Voluntary Sector (CVS)	Head of Communities, Equalities & Third Sector	70	31/03/20	01/06/15	31/03/20
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Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> A new cross sector volunteering action group was convened end of November 2017 - City Volunteering Partnership. This brings together the volunteer leads in the key public sector organisations with volunteer leads in the CVS to work collectively on delivering the city's Power of Volunteering pledges. The group has met three times in 2018 and once so far in 2019 and identified the key strategic issue for the city on volunteering is the increasing complexity of volunteers versus the capacity available within organisations to support the volunteers as well as continuing to promote volunteering to all communities in the city. A range of actions will be developed to address the issue however limited capacity in the council and the community and voluntary sector has slowed developing a response. Community Works is leading on the development of a peer support project in the community and voluntary sector to help organisations host increasingly complex volunteers. Others actions that have completed include toolkit on the Volunteer Centre's website for supporting volunteers from overseas. The group has also analysed the data from City Tracker on demographics of those least likely to volunteer to inform any targeted work and the city held its first volunteering fair specifically targeted at BME communities. The second year of 'working with communities and volunteers' training started in April 2018 and progressed well with a high number of participants from wide range of services and organisations. This cross sector action learning training was targeted at the four community hub areas and has been redesigned to maximize attendance by front line staff: East Brighton, Mouslecoomb and Bevendean, Hangleton and Knoll, Hanover and Elm Grove. A further round of sessions have been delivered monthly across the four hubs areas throughout 2019 and will continue monthly until the end of the financial year.</p>					

