

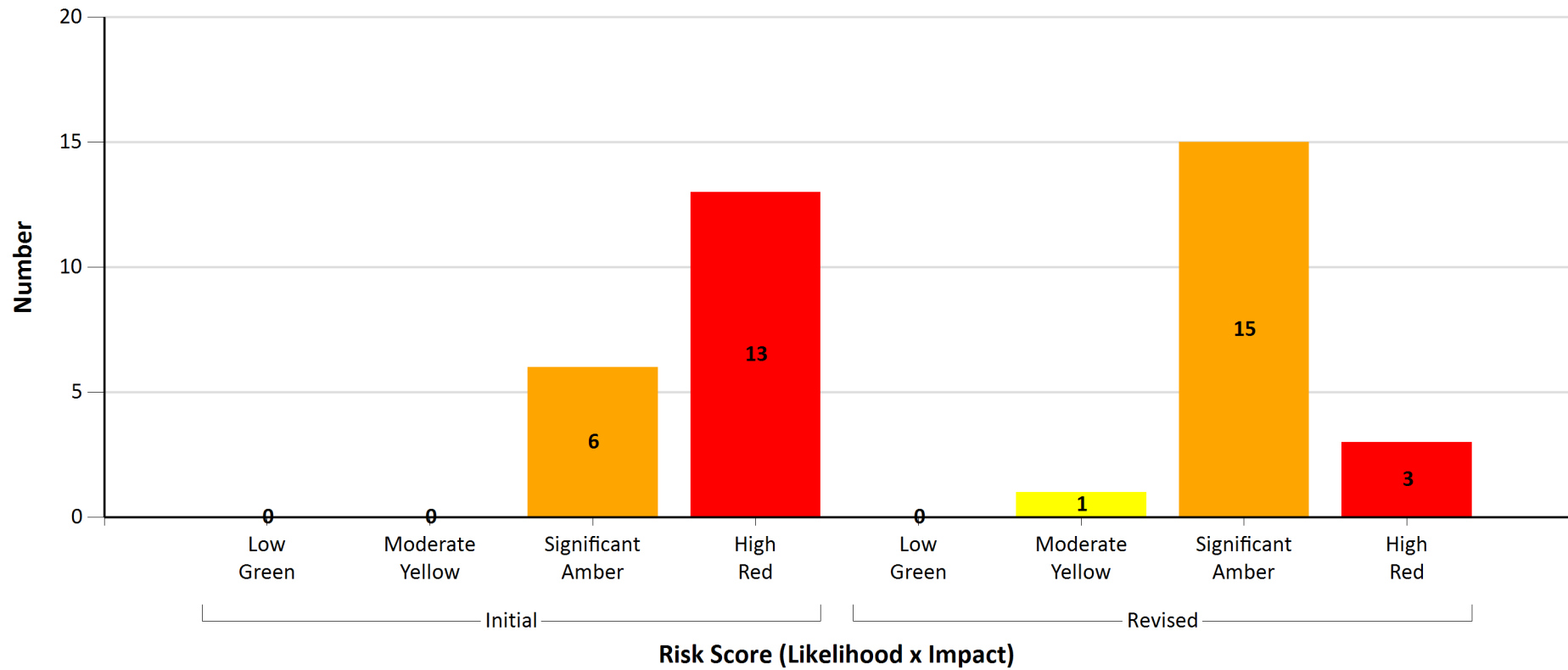
# Brighton & Hove City Council

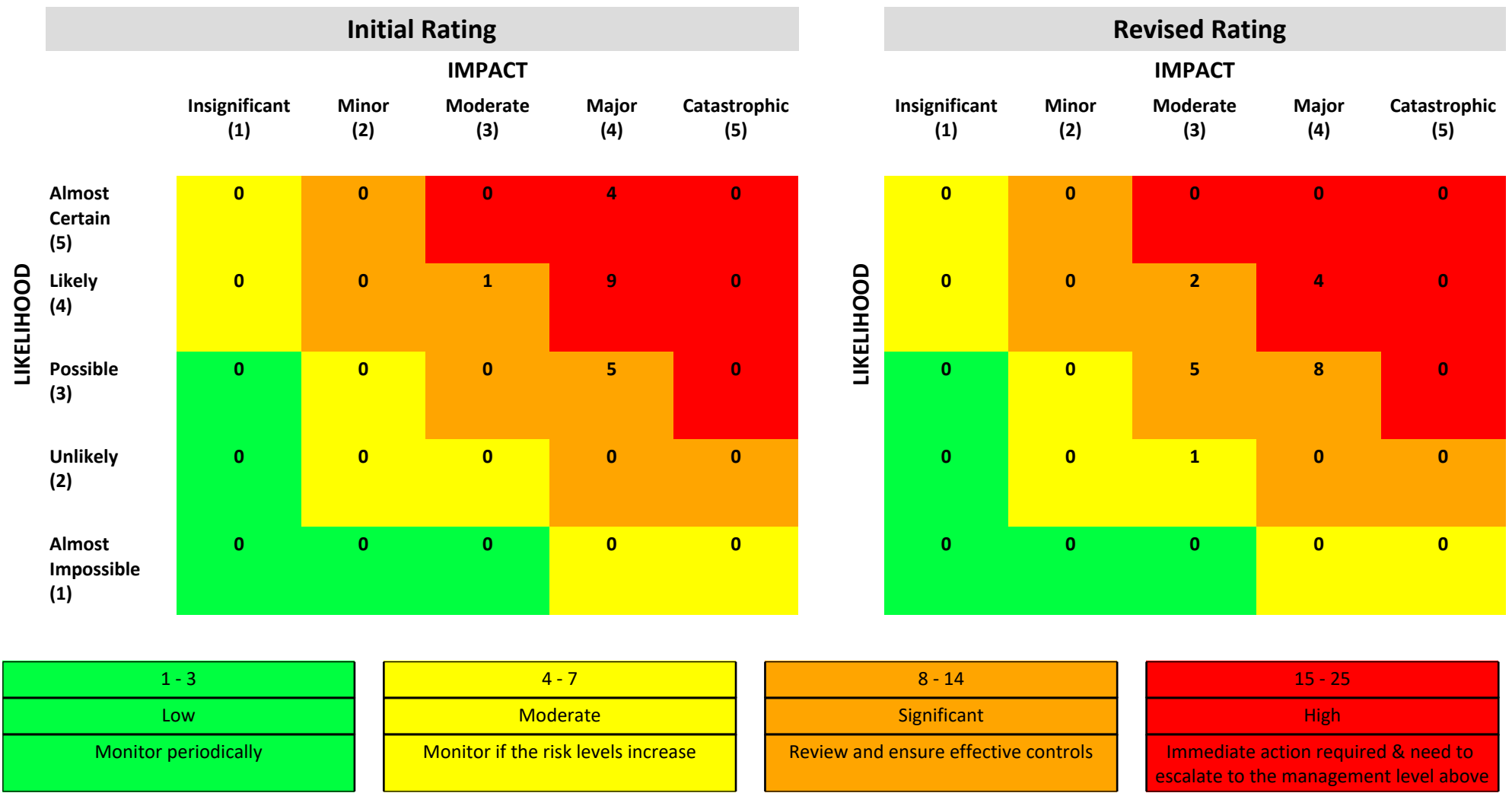
## Strategic Risk Register

All

*Print Date: 29-Jun-2020*

## Risk Summary





## Risk Details

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR10	<b>Corporate Information Assets are inadequately controlled and vulnerable to cyber-attack</b>	Chief Executive Head of Strategy & Engagement	BHCC Strategic Risk, Legislative	13/05/20	Threat	Treat	<div style="background-color: red; color: black; text-align: center; padding: 5px;">Red</div> L4 x I4	<div style="background-color: orange; color: black; text-align: center; padding: 5px;">Amber</div> L4 x I3		Revised: Uncertain

### Causes

Link to Corporate Plan 2020-23. Attributes 7. 'How will the plan be delivered' actions to deliver 'A well run council'.

Inadequate Information Security

Inadequate Information Governance

Inadequate Information Management

due to lack of resource and organisational maturity and ever-increasing levels and complexity of threats at a time when the organisation increases information assets.

### Potential Consequence(s)

- Individuals could suffer reputational, financial or physical harm,
- The council could suffer reputational and/or financial loss along with an inability to function effectively
- The financial sanctions available to the Information Commissioner's Office (ICO) are significant
- The Public Services Network (PSN) & Health & Social Care Information Centre (HSCIC) could impose operational sanctions which would be catastrophic for many services,
- Inadequate Information Governance management lends itself to poor Data Protection practices incl. non-compliant circulation of data & leaks
- It could result in a loss of trust in the council by citizens and partners.

### Existing Controls

First Line of Defence: Management Action

These are set out under each of the Risk Causes (in capital letters)

A) Controls re. Cause relating to INADEQUATE CYBER SECURITY

1. Physical access controls for many services have been improved a result of the move to the Orbis Data Centre (ODC1) and continued in 2019/20.
2. Protective monitoring technology is in place to provide threat, vulnerability and incident alerts
3. The council's Behaviour Framework applies to all staff and includes under 'Behaving Professionally' the text "I handle confidential matters and

information discreetly and within set guidelines (e.g. Data Protection, data sharing protocols)

4. Incident management now integrates data breach and cyber security incidents

5. Online IG training is published on the learning gateway

B) Controls re. Cause relating to INADEQUATE INFORMATION GOVERNANCE

6. A suite of Information Governance Policies are reviewed and approved annually

7. An information risk register is regularly reviewed by Information Governance Board (IGB) and the Senior Information Risk Owner (SIRO)

8. Privacy impacts assessments (PIAs) conducted for all new business process and systems involving personal information.

9. Standardised and repeatable workflows and procedures are in place for privacy by design, new major contracts information rights handling.

10. The key responsibilities of all with Leadership Roles at Tier 2, i.e. including all Executive Directors, includes: 'To be accountable for safeguarding and effective exploitation of all data and information systems within the area(s) managed in line with corporate risk management protocols, and in collaboration with services across the organisation.

Approval of business case in May 2019 for increased and dedicated resources to supplement the management and co-ordination of SARs and FOI requests.

11. DPO benchmarking & audit July 19 informs future improvement activity

Second Line of Defence: Corporate Oversight

1) The Senior Information Risk Owners (SIRO) oversees the organisation's approach to Information Risk Management, setting the culture along with risk appetite and tolerances;

2) The Information Governance Board ("IGB") oversees and provides leadership on Information Risk Management and obligations arising from legislation such as the Data Protection Act (DPA) 1998 & Freedom of Information (FOI) Act 1998;

3) The Caldicott Guardians (Executive Directors Families, Children & Learning; and Health & Social Care) have corporate responsibility for protecting the confidentiality of Health and Social Care service-user information and enabling appropriate information sharing;

4) The Information Governance Team operates as an independent function to provide advice, guidance and oversight in key areas.

5) Information Governance and Cyber Security receives oversight from the Audit and Standards Committee;

6) A Joint Orbis Data Protection Officer (DPO) has been in post as of May 2018. This role assists in the monitoring of internal compliance, provides advice on data protection obligations and Data Protection Impact Assessments (DPIAs).

Third Line of Defence: Independent Assurance



1. Internal and external IT audits provide an objective evaluation of the design and effectiveness of IT&Ds internal controls. An annual Internal Audit schedule is agreed with internal audit; some focus audits specifically on Information Governance (IG) areas, but all will cover some aspect of IG. The outcome of all audits is reported to the Audit and Standards Committee quarterly.

2. IT Health Check (ITHC) performed by a 'CHECK'/'CREST' approved external service provider – covering both applications and infrastructure assurance. The ITHC approach has been updated to include one standard annual check and one targeted solution specific check (e.g. the mobile service).

3. Continued assurance from compliance regimes, including Public Sector Network (PSN) CoCo (Code of Connection); NHS Digital Data Security and Protection (DSP) Toolkit; and Payment Card Industry Data Security Standard (PCI DSS).

Reason for Uncertain status for effectiveness of controls: Cyber threats are evolving to become more sophisticated and our growing dependence on technology means that the impact of a successful attack has greatly increased. Proportionate technical and behavioural mitigations of this risk may not prevent a highly sophisticated, persistent attack.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
INFORMATION GOVERNANCE/CYBER SECURITY: Establish an Orbis-wide approach to the identification, assessment and management of information risk	Head of Strategy & Engagement	30	31/03/21	02/04/18	31/03/21
<b>Comments:</b> January '20 Update: Progress has continued to stall due lack of capacity as a result of long term sickness in the IS (Information Security) team. A basic approach to risk management has been set up within BHCC, but approaches across the Orbis partnership vary - leading to suboptimal processes and duplication of effort.					
INFORMATION SECURITY: Access management project	Head of Strategy & Engagement	40	31/12/20	02/04/18	31/12/20
<b>Comments:</b> April '20 update: The Access Modernisation project has been put on hold since March in order to divert resource into covid-19 response work. The project will restart in late May/early June at which point timescales for project delivery will be re-worked. January '19 Update: The Access Management project has been closed and a replaced by the Access Modernisation project focused on the definition and set up of four key data sets (staff index, asset register, applications register and premises). Phase 1 will be deliver by close of 2019/20.					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR13	<b>Not keeping vulnerable adults safe from harm and abuse</b>	Executive Director Health and Adult Social Care Assistant Director Resources, Safeguarding and Performance	BHCC Strategic Risk, Legislative	13/05/20	Threat	Treat	 L4 x I4	 L3 x I4		Revised: Uncertain

#### Causes

Link to Corporate Plan 2020-23. Outcome 6 'A Health and Caring city' and actions to 'support people to live independently'

Keeping vulnerable adults safe from harm and abuse is a responsibility of the council. Brighton & Hove City Council has a statutory duty to co-ordinate safeguarding work across the city and the Safeguarding Adults Board. This work links partnerships across the Police and Health and Social Care providers. Under the Care Act, since 2015, the Local Authority has a statutory duty to enquire, or cause others to enquire, if it believes a person with care and support needs is experiencing or is at risk of harm and abuse and cannot protect themselves. In 2017/18 809 safeguarding enquiries were completed by the adult assessment service, similar data for 2019/20 is being finalised.

The Care and Support Statutory Guidance makes requirements regarding 'Making Safeguarding Personal' setting expectations for safeguarding work to be 'person led and outcomes focussed.'

#### Potential Consequence(s)

- \* Failure to keep vulnerable adults safe from harm or abuse will pose risk to vulnerable citizens
- \* Failure to meet statutory duties could result in legal challenge
- \* Failure to respond to a more personalised approach could result in challenge
- \* Inadequate budget provision could result failure to meet statutory requirements

#### Existing Controls

First Line of Defence: Management Controls

1. Local Safeguarding Adults Board (LSAB) work plan established, with independent leadership, with aligned LSAB sub group work plans
2. Multi agency safeguarding adult procedures in place, for preventing, identifying, reporting and investigating allegations of harm and abuse, in line with Care Act requirements and endorsed by all 3 Sussex Safeguarding Adults Boards. Continuous professional development plan in place for social work qualified staff, including a training programme and Practice Development Groups, for Care Act and Mental Capacity Act requirements. Impact of

assessment staff training and uptake monitored through Audit Moderation panel and Statutory Duties Training Group.

3. For Adult Social Care (ASC) staff who have contact with vulnerable people, Safeguarding Awareness Training is Mandatory, and uptake is monitored through the LSAB Self Assessment submission.

4. BHCC Quality Monitoring Team oversee process in place to monitor quality of adult social care providers, in partnership with Clinical Commissioning Group (CCG), and Care Quality Commission (CQC).

5. Violence Against Women and Girls training programme available for LSAB member organisations, and ASC Assessment Service staff enabled to attend.

6. Dedicated Principal Social Work post for adult services, ensuring well trained, motivated social work service, meeting continuous professional development requirements in line with Social Work Professional Capabilities Framework, including expectations for professional supervision.

7. Senior Social Work/Operational Management authorisation of all Mental Capacity assessments undertaken in ASC Assessment Service.

8. Named Enquiry Supervisor for all Safeguarding Enquiries undertaken in ASC Assessment Service.

9. Deprivation of Liberty Safeguards (DoLS) Team to lead and co-ordinate all DoLS referrals in line with statutory requirements.

10. Approved Mental Health Practitioner (AMHP) Operations Manager overseeing the AMHP Team, to meet all relevant statutory requirements. This includes review (with SPFT) of demands on the service in light of changes to S136 legislation.

11. A range of materials and offers to signpost people to help inform good safeguarding is available e.g. on LSAB and Council website, safeguarding adult section.

#### Second Line of Defence: Corporate Oversight

1. Quality Assurance across key agencies, monitored by the Independently Chaired LSAB, with annual progress report on the LSAB work plan reported to Health and Wellbeing Board, and published.

2. Multi agency, and single agency safeguarding audits undertaken. The Safeguarding Adult Review sub group of the LSAB continues to meet monthly, and considers referrals for Safeguarding Adult Reviews, as well as looking at relevant coroner's rulings for the area.

3. Quarterly audit framework for adult social work service monitoring safeguarding enquiry practice are monitored by Audit Moderation Panel, and Corporate Performance Indicator (KPI) to monitor the outcome for the individual from the safeguarding intervention.

4. Care Governance Board overseeing Quality Monitoring and is attended by the CQC who share information which enables local risks to be considered and assessed.

5. Learning from Safeguarding Adult Reviews (SARs), monitored through SAR sub group of the LSAB.

6. Yearly Social Work Health Check undertaken jointly by Principal Social Workers in both Adult Social Care; and Families, Children & Learning.

7. LSAB Independent Chair meets quarterly with the 3 Statutory agencies for safeguarding, where Director of Adult Social Services (DASS) represents the Local Authority.

8. LSAB annual report to Health and Wellbeing Board, includes statutory progress report on LSAB work plan.

9. Pan Sussex Safeguarding adults procedures group, meets quarterly, to review and update Sussex Safeguarding Adults procedures regularly, ensuring they are legally compliant and responsive to local and national practice development and learning.

10. Dols Governance Group meets quarterly, attended by Assistant Director and Head of Adult Safeguarding, to ensure activity under DOLs is quality assured, meets legal requirements, and activity is delivered with an efficient use of resources.

11. Departmental Management Team and HASC Modernisation Board oversee developments and monitor risks to Department.

12. Working with ADASS (association of directors of adult social services) on monitoring the impact of DoLS work to Local Authorities following the



Supreme Court ruling in 2014 (P v Cheshire West Council and P&Q v Surrey County Council).

13. Joint service improvement panels with partners, including the CCG, share inspection results, complaints and other issues.

14. HASC Directorate Plan includes safeguarding priorities.

#### Third Line of Defence: Independent Assurance

1. For the council's in-house registered care services CQC Inspections on an on-going regular basis. Information on council website re. inspection results: <https://www.brighton-hove.gov.uk/content/social-care/getting-touch-and-how-were-doing/adult-social-care-inspection-reports-council>

2. CQC's programme of inspections of all registered care providers are published weekly and available on CQC's website [www.cqc.org.uk](http://www.cqc.org.uk). These are monitored for local relevance by the council's Quality Monitoring team managed by the Head of Adult Safeguarding.

3. Safeguarding referrals through the Adult Social Care's 'Access Point', the point of public contact for issues relating to Adults, can be made by anyone including other professionals, GPs, Police, neighbours, friends. Access Point safeguarding referrals are assessed by Senior Social Workers.

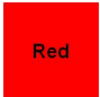

Reason for Uncertainty in Effectiveness of Controls: The city council has arrangements in place to manage this potential risk which are regularly reviewed; however, despite efforts there are no guarantees that there will not be incidents.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Continue to learn from Safeguarding Adult Reviews, coroners inquests and case reviews	Assistant Director Resources, Safeguarding and Performance	25	31/03/21	01/04/15	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> May 20 update - work continues to deliver our statutory duties and we work with partners, examples are given in the previous updates below.</p> <p>January 20 update - A Safeguarding Adults Review was undertaken (called SAR X), written by an Independent Author commissioned by the Local Safeguarding Adults Board (LSAB) following the death of a person who was homeless, who was at times not engaging with support agencies, and with a Personality Disorder. The review was commissioned by the LSAB in April 2016.</p> <p>The SAR Sub Group of the LSAB (Chaired by B&amp;H HealthWatch) has finalised the SAR X Action plan.</p> <p>The SAR X Action Plan is reviewed and monitored via the SAR Sub Group, which reports to the LSAB. The SAR Sub Group will monitor the completion of the Action Plan. Reviewed at the SAR Sub Group 18/03/2019 and noted to be completed.</p> <p>SAR X summary is published on the LSAB website <a href="http://brightonandhovelscb.org.uk/safeguarding-adults-board/safeguarding-adults-reviews/">http://brightonandhovelscb.org.uk/safeguarding-adults-board/safeguarding-adults-reviews/</a>.</p> <p>A briefing regarding SAR X has been completed, and has been circulated to all LSAB member organisations for staff awareness.</p> <p>A multi agency audit has been completed by the LSAB regarding adherence to requirements of the Mental Capacity Act. An Action Plan has been drawn up from this audit, which has agreed at the Quality Assurance Sub Group of the LSAB on 21/01/2019. Progress on the Action Plan is be monitored through the Quality Assurance Sub Group and reported to the LSAB, and is noted as on target for completion.</p> <p>An audit regarding adherence to Making Safeguarding personal principles has been undertaken in September 2019. The action plan was agreed at the next Quality Assurance Sub Group on 14/10/2019, and progress on it will be reported to the sub group on 28/01/2019.</p> <p>All 3 Sussex Safeguarding Boards have committed to SCIE Learning Review methodology, and a number of SAB members have attended training on this in order to become reviewers.</p>					
Develop and deliver Advance level Safeguarding training for senior and experienced social workers	Assistant Director Resources, Safeguarding and Performance	75	31/03/20	01/06/18	31/03/20

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<b>Comments:</b> Delivery of training started 26th March 2019. Course content has been developed in consultation with the assessment team. This course is for senior and experienced social workers, focussing on complex safeguarding cases. Monitoring of the take up and effectiveness of this course is through the Statutory Duties Training Group, chaired by the Principal Social Worker. The target for delivery is 80% of all staff who require it by 31/3/20, and is on track.					
Monitor progress of legislative change from DoLS to Liberty Protection Safeguards	Assistant Director Resources, Safeguarding and Performance	75	31/10/20	01/04/19	31/10/20
<b>Comments:</b> Initial multi agency planning meeting held 13/05/2019. Overview of new legislation shared by Dols Lead, and potential implications, risks and legal interpretations discussed. Agreed Steering Group members, and frequency of Steering Group meetings. Note earliest implementation date would be October. Progressing on track, awaiting the publication of the new codes of practice. DoLS lead gave an update presentation to the safeguarding Adult board members 16th September 2019.  Next steps: 1. Steering Meeting dates set, next meeting 29th January 2020 (Jan 19, Head of Adult safeguarding). 2. DoLS Lead continues to keep updated on progress of potential Code of Practice, by linking in with South East Leads group (ongoing, DoLS Lead)					
Programme of Prevent training to be rolled out to all Assessment Service staff in contact with citizens, Senior Social Workers and Operations Managers, and Registered Managers of provider services. All relevant staff to have attended training.	Assistant Director Resources, Safeguarding and Performance	70	31/10/20	20/01/17	31/10/20

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> 97 staff have been trained so far, which is 65% of the target workforce (150). The aim had been for full completion by April 2019. Unfortunately due to staff undertaking the training having moved roles, we have been delayed in completing this action. 3 staff have been identified to undertake the training, and they are awaiting the opportunity to undertake the training course which will then enable them to deliver this training to HASC staff so that we can then complete the training target. In the interim all staff have been requested to complete the Home Office Prevent e-learning training, and a reminder of this has gone to HASC staff through the 'In the Loop' communication newsletter. As this is Home Office training it is not possible to get a local read out of uptake, and is therefore monitored through line management via the PDP and supervision process. The Quality Monitoring Team has had a training session by the Prevent Lead, and are incorporating learning from this into their quality audit visits of commissioned adult social care providers.</p>					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR15	<b>Not keeping children safe from harm and abuse</b>	Acting Executive Families, Children & Learning Service Manager - Directorate Policy & Business Support	BHCC Strategic Risk, Legislative	13/05/20	Threat	Treat	 L4 x I4	 L3 x I4		Revised: Uncertain

#### Causes

Link to Corporate Plan 2020-23. Outcome 4: 'A growing and learning city' and actions linked to 'Ensure that no child or family are left behind' 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 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. Brighton & Hove Safe Guarding Children's Partnership (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 Continuing Professional Development 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 Acting 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. In January 2020 the Local Government Association (LGA) reviewed Early Help processes and an action plan is being developed to take recommendations forward.



5. In February 2020 Ofsted understood a focussed visit looking at services to children in need and children with child protection plans. Ofsted were pleased with the progress made since their visit in 2018 and the improvement plans have been adjusted according to their most recent feedback.

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	75	31/03/21	01/04/19	31/03/21
<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. Most cases are not eligible for the Troubled Families Programme as they have been worked with in the past. 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. .					
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
<b>Comments:</b> 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. 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.					
The Brighton & Hove Safeguarding Children Partnership (BHSCP) will continue to monitor safeguarding delivery across all agencies in the city to ensure effective safeguarding is in place.	Acting Executive Families, Children & Learning	75	31/03/21	01/04/19	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<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 has been completed and findings are being shared. 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
SR18	<b>The organisation is unable to deliver its functions in a modern, efficient way due to the lack of appropriate technology</b>	Head of Human Resources & Organisational Development Head of Strategy & Engagement	BHCC Strategic Risk, Technological	13/05/20	Threat	Treat	 L4 x I4	 L3 x I4		Revised: Adequate

#### Causes

Link to Corporate Plan 2020-23. Link to Corporate Plan 2020-23: Attributes 7. 'How will the plan be delivered' actions to deliver 'A modernising council'.

Failure to adopt and adapt to new digital technologies caused by:

Sub-optimal technology capabilities - led by IT & Digital

1) Insufficient IT & Digital staff with the appropriate skills to interpret business need, create strategies and develop, implement, support and maintain new technologies

2) Insufficient investment in the underlying IT infrastructure and platforms

3) Insufficient investment in modern corporate and line of business applications and user device

Sub-optimal staffing capabilities - led by HR OD

4) Insufficient understanding and leadership at all levels of the organisation to exploit the opportunities of modern, digital IT to improve service delivery

5) Low level of basic technical skills in current staff and low confidence in using and innovating with information and technology

6) Failure to recruit/develop sufficient 'high-end' new data management/data analyst skills across business teams

7) Insufficient understanding, management and use of service and corporate data as an asset

Potential Consequence(s)

1. Staff do not have appropriate access to the tools and information needed to carry out their roles
2. Unable to transform services to achieve efficiencies and better outcomes for residents, communities, businesses and visitors
3. Unable to meet organisational budget reductions if automated services are not introduced
4. Less effective and engaging interactions with residents and communities
5. Impact on council and city reputation as a digital city
6. Staff morale affected
7. Unable to attract and retain talent due to not meeting expectations of a modern working environment
8. Limits ability to achieve relevant Corporate Plan objectives

#### Existing Controls

- 1) Technology and Digital Board in place to align priorities, coordinate co-delivery, remove blockers and track benefits
- 2) Data Insight Steering Group in place to oversee the delivery of data & analytic capabilities
- 3) Through a capital investment programme IT&D has greatly stabilised the underlying IT infrastructure and introduced a number of new capabilities. These include implementing a new Mobile Device Management (MDM) system and migrating all member and officer mobile phones from out of support Blackberrys to iPhones, migrating from an end of life Citrix environment onto a new platform, moving all email off premise onto the Microsoft cloud and moving from the withdrawn Eduserv datacentre service into the Orbis data centre (ODC1).

#### Second Line of Defence: Corporate Oversight

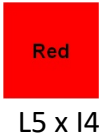

- 1) Tech & Digital Board in place to review progress, identify interventions where strategic changes on IT are required, and produce a re-focused strategy that aligns the needs of services
- 2) Corporate Modernisation Delivery Board overseeing alignment of programmes and projects to Corporate Plan aims and reviewing any gaps. This includes the oversight of IT&D Infrastructure programme (DOP)
- 3) ELT oversight of Annual staff survey has regularly identified concerns with staff not having the right tools/resources to do their jobs. This may include some issues related to IT provision and provides a benchmark for IT change programmes

#### Third Line of Defence: Independent Assurance

None

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Sub-optimal technology capabilities: Issue new laptop and upgrade existing desktop devices to Windows 10 prior to the retraction of extended support (including the issuing of security patches) for Windows 7 in early 2020. Additionally, increase the laptop estate from approx. 2000 devices to 4000 devices.</p> <p><b>Comments:</b> April '20 update: Extended support (until Feb 2021) has been procured for remaining Windows7 devices. Win10 laptop deployment has halted due to covid-19 pandemic. Prior to the pause, approximately 45% of devices had been rolled out. The project will restart in May.</p> <p>January '20 update: Deployment has been delayed by a few months due to difficulties with scripting and downloading of the Windows build to devices. These issues have been resolved, but a full deployment of Windows10 will not happen before the end of support for Windows7. Additional support has been procured for remaining Windows7 devices. Over 400 'early adopter' deployments have taken place and piloting of XMA deployments completed before the end of December. A complete deployment of Windows10 will complete end of April 2020.</p>	Head of Strategy & Engagement	70	31/03/21	01/03/18	31/03/21
<p>Sub-optimal technology capabilities: Social Care and Housing service projects to replace core systems of record and establish improved data management practices</p> <p><b>Comments:</b> April '20 update: Both CareFirst replacement project and OHMS replacement project have selected suppliers and initial architectural/IG reviews have taken place. Both projects are in early delivery phase, but timescales are likely to slip due to the covid-19 pandemic.</p> <p>January '20 update: Both CareFirst replacement project and OHMS replacement project have selected suppliers and initial architectural/IG reviews have taken place. Both project are in early delivery phase.</p>	Head of Strategy & Engagement	40	31/03/21	20/04/17	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Use Digital Customer funding to enhance online offer and joined up information systems to improve customer experience thereby reducing avoidable demand on staff time.</p>	<p>Interim Executive Director Housing, Neighbourhoods &amp; Communities</p>	<p>60</p>	<p>31/08/21</p>	<p>01/04/19</p>	<p>31/08/21</p>
<p><b>Comments:</b> Reviewed in April '20 but not change to January '20 Update:  Activity on the Digital programme is focused on 4 workstreams:  1. Website content transition  On target for August 2021 (in line with the termination of the Achieve Contract).  2. My Account  Completed of 90 day Single Sign on Pilot (SSO). Services currently available are Visitor Parking, City Clean and Council Tax, with the latter being the focus of broader design decisions. Considerations around support and go-live are still to be addressed. Architectural design of Test, QA &amp; Production environments is almost complete. Testing and subsequent bug fixing is nearing completion and on-track for sign-off.  3. Customer and Property Indices  The Customer Index is continuing to progress with further improvements and enhancements being made to dataset matching. In addition to the Customer Index database, there is ongoing development work to create products which display the Customer Index data on a user lookup (Customer Viewer), as well as products which rely on automated verification against the Customer Index (MyAccount). Further stages of work will focus on increasing the number and scope of additional datasets added to the Index, as well as additional business intelligence derived from the combined data e.g. fraud. The Property Index is currently in development. The goal is to produce an extension to the LLPG by creating additional property-based categories e.g. HRA-property; HMOs, etc.  4. Case management  The Mendix MVP is completed but not yet in production as work is continuing to map BHCC in order to create a product which will enable staff to work on cases at the same time and/or pass casework across the organisation.</p>					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR2	<b>The council is not financially sustainable</b>	Deputy Chief Finance Officer Head of Performance, Improvement & Programmes	BHCC Strategic Risk, Economic / Financial	13/05/20	Threat	Treat				Revised: Uncertain

#### Causes

Link to Corporate Plan 2020-23: Attributes 7. 'How will the plan be delivered' actions to achieve 'A well run council'.  
 Reductions in central government funding will continue through to 2020 under the 2015 Comprehensive Spending Review and potentially beyond. The changes to local government funding introduced in 2013/14 also transferred greater risks to the council, particularly in relation to Business Rate valuation appeals. There is a cumulative impact of reductions in government funding to other public agencies in the city. The greatest risks are from the new financial impacts of Covid-19 and already identified increasing cost and demands across demand-led services such as social care and homelessness. 4-year Integrated Service & Financial Plans were introduced in 2016/17 and it is planned to maintain a 4-year Budget Planning process but updating these and the Medium Term Financial Strategy annually will remain challenging given the continuing uncertainty in funding and taxation levels. There is increased uncertainty until HM Govt re-focuses on local government funding including retention of up to 75% of Business Rates and completion of the Fair Funding Review, both of which could have national distributional impacts.

#### Potential Consequence(s)

The council will need to adapt to the financial impact of Covid-19 and continue robust financial planning in a highly complex environment. Failure to do so could impact on financial resilience and mean that outcomes for residents are not optimised.

#### Existing Controls

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

1. Ongoing review of the adequacy of risk provisions and reserves to support the medium term budget strategy and to ensure financial resilience.
2. Medium term resource projections (MTFS) and savings plans (4-Year Budget Plans) are reviewed and revised where necessary to identify and address predicted budget gaps including identification of taxation and savings options.
3. Consultation and engagement with the Leadership (member oversight), cross-party Budget Review Group and partners (particularly the Clinical Commissioning Group 'CCG') for development and approval of the annual budget led by Executive Leadership Team (ELT ) and the Chief Finance Officer (CFO).
4. Targeted Budget Management (TBM) Month 7 and month 9 projections are undertaken to accompany draft (Nov/Dec) and final (Feb) budget reports to ensure in-year pressures are reflected in resource projections and budget setting.
5. Taxbase forecasts and projections updated and reflected in the Medium Term Financial Strategy (MTFS) and annual budget proposals and reported by

the statutory deadline (31 January).

6. Investment requirements reviewed and funding flexibility identified to ensure delivery of modernisation and savings proposals included in the 4-year plans.

\* Key control: annual revenue and capital budgets approved by Full Council in February with a balanced budget and 'funded' capital programme;

\* TBM Monitoring regime includes RAG rating of budget performance with an escalating scale of scrutiny and intervention where continued overspending is evident. Interventions focus on development of Financial Recovery Plans approved and monitored by the CFO but can ultimately include 'special measures' such as specific vacancy controls.

#### Second Line of Defence: Corporate Oversight

1. Modernisation portfolio monitored by the Corporate Modernisation Delivery Board (CMDDB) and reviewed by cross-party Member Oversight group.

2. Close alignment of corporate priorities with the Medium Term Financial Strategy (MTFS) and, particularly, 4-Year Budget Plans.

3. Regular monitoring and review by Policy & Resources (P&R) Committee of the MTFS assumptions, the impact of legislative changes; cost and demand pressures; savings programmes; and income, taxation and grant assumptions through TBM reporting and various budget reports (Jul, Nov/Dec, Jan and Feb).

4. Continued adoption by P&R of the 4-Year Budget Planning approach which sets out plans through to 2019/20 (current period) and from 2020/21 to 2023/24 and identifies investment requirements to ensure delivery.

5. Close monitoring by P&R of council tax, business rates and other income and regular updating of forecasts.

6. Ongoing review and challenge of value for money including Member review, benchmarking, and external audit review and opinion.

7. The cross-party Budget Review Group periodically reviews TBM performance and Treasury Management performance.

8. The Administration's Leader, Deputy Leader and Finance Lead, and Policy Chairs Board provide oversight of the budget.

9. Oversight of pooled funds and integrated arrangements through separate governance arrangements including Health & Wellbeing (HWB) Board, BHCC - CCG Finance & Performance Board and representation on the SES STP, MH STP and TCP Regional Finance Groups.

#### Third Line of Defence: Independent Assurance

1. Annual review 2018/19 reported in July 2019 by external auditors of Value for Money (VfM) arrangements leading to an opinion in the annual audit report concluded there were no governance issues to report and arrangements to secure VfM and the council's use of resource were reasonable.

2019/20 review is in progress.

2. Internal audit reviews of budget management and financial planning arrangements. 2018/19 Budget Management audit gave Substantial Assurance.

Internal audits of other key financial systems are undertaken regularly. The majority have been given Substantial or Reasonable assurance opinions with the exception of Council Tax and Debtors where a Partial assurance opinion was given.

3. Internal Audit Creditors 2019/20 - Reasonable Assurance opinion in respect of Creditors 2019/20.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Continue to monitor impact of health sector reforms, integration and Better Care programmes.	Deputy Chief Finance Officer	25	31/03/21	01/04/20	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> Meetings with the CCG Director of Finance and the council's Chief Finance Officer are in place to ensure alignment of budget setting processes as far as possible, including contributions to the NHS long term plan (LTP). The Better Care Fund (BCF) S75 Agreement for 2019/20 has been agreed and submitted to NHSE including the risk share arrangement. Agreement to pooling COVID-19 resources has been approved by Policy &amp; Resources Committee (27 May 20). Recovery plans and corrective measures will be proposed where necessary. Monthly reporting of the council's element of the risk share is provided via the Targeted Budget Management framework. There is on-going dialogue between the two organisations through the Integration Board and the Chief Executives and there is a stated commitment to alignment of long term financial planning. Agreement to 2020/21 baseline CCG funding has now been reached, with no reductions, and is reflected in the approved 2020/21 General Fund budget. Conversations are on-going regarding aligning MTFS's in the context of the NHS 5 Year Plan and the shift of STP plans across to Integrated Care Plans (ICPs) within an integrated care system (ICS). The impact of COVID-19 will also be considered.</p>					
<p>Corporate Modernisation Delivery Board includes monitoring and RAG rating of critical VFM and other savings programmes that support the council's current and medium term financial position. Reporting links to TBM reporting which also monitors savings delivery.</p>	<p>Head of Performance, Improvement &amp; Programmes</p>	20	31/03/21	01/04/20	31/03/21
<p><b>Comments:</b> Corporate Modernisation governance arrangements are in place. Corporate Modernisation Delivery Board (CMDDB) continues to provide support and challenge to project/programme managers and Senior Responsible Owners. All budget figures reported link to the TBM budget monitoring process. A revised RAG guidance has been prepared which is resulting in more accurate reflection of the progress. A revised Modernisation Investment programme was agreed by Budget Council in February 2020 and will underpin modernisation programmes and activity over the next 4 years to support achievement of identified savings requirements to address budget gaps in the MTFS.</p>					
<p>Meet Targeted Budget Management (TBM) reporting timetable and identify risk mitigation and corrective action where necessary</p>	<p>Deputy Chief Finance Officer</p>	15	03/03/21	01/04/20	03/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> The current annual TBM reporting timetable has been produced and agreed. TBM Month 2 is the first reporting period each year to July P&amp;R. TBM reports are regularly shared with the cross-party Budget Review Group (BRG) to ensure additional member oversight of the financial position. TBM reporting will identify risk mitigation and corrective action for overspending areas identified by RAG rating. A revised TBM regime ensures that escalating interventions apply where continued overspending (RED RAG) is evident. Interventions focus on additional scrutiny by the CFO and/or Chief Executive Officer (CEO), CFO approval of Financial Recovery Plans, and ultimately potential 'special measures' interventions where overspending persists. All savings programmes will also be monitored through the TBM report and via the Corporate Modernisation Delivery Board (CMDDB). The council maintains a Working Balance of £9m to mitigate financial risks and set aside a specific risk provision of £0.750m to mitigate forecast risks or underachievement of savings.</p> <p>The impact of COVID-19 on the council's finances is likely to be fundamental and have far-reaching consequences for financial planning over the medium term. Current estimates indicate a 2020/21 budget deficit of £15m by the end of June and a potential deficit of between £30m to £50m for the whole of 2020/21 dependent on the speed of recovery of the visitor and business economies, both of which have direct links to the level of taxation, fees and charges, and commercial rents receivable by the council.</p> <p>The COVID-19 impact is being monitored closely and reported regularly to Policy &amp; Resources Committee (including Special P&amp;R's and Urgency Sub). The process of identifying mitigating actions has started with the 'pausing' of capital programmes funded by borrowing until July 2020 (where they will be reviewed again) and ELT are currently putting together other options for members' consideration including:</p> <ul style="list-style-type: none"> <li>- Furlough of staff (where the service is funded by fees &amp; charges income);</li> <li>- Vacancy management processes (with necessary exceptions for key services);</li> <li>- Curtailment of non-essential, discretionary spend and programmes;</li> <li>- Development of options for additional savings or bringing forward 2021/22 savings options – potentially this could be supported by Voluntary Redundancy process;</li> <li>- Utilising the Working Balance and/or other earmarked reserves with plans to replenish them over the next 3 to 4 years through the MTFs (i.e. increased savings targets); and</li> <li>- Consideration of other higher risk or more complex options such as a Council Tax Referendum or selling off assets.</li> </ul> <p>In the meantime, the council will continue to closely monitor the impact of COVID-19 and continue to lobby government for more resources and other medium term financial support.</p>					
Update and maintain an MTFs and 4-year Budget Planning timetable and process.	Deputy Chief Finance Officer	50	31/03/21	01/09/19	31/03/21



Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> 4-Year Budget Plans will continue over the next four years from 2020/21 to 2023/24. Proposals for 2020/21 were approved by Budget Council on 27 February 2020. An MTFS update is provided each July and February to P&amp;R to ensure resource projections and predicted budget gaps continue to be identified as early as possible with associated savings proposals (4-year plans). The 2020/21 budget identified £9m savings to close the budget gap. An updated MTFS identifies potential budget gaps for the next 4 years of £31m (including 2020/21) assuming no further reductions in government support grant and a neutral impact from the Fair Funding Review and 75% Business Rate Retention (from 2021/22). The revised MTFS was reported to Budget Council on 27 February 2020.</p> <p>The council has a well-defined budget setting process which begins early in the financial year (May) and works iteratively through to draft proposals in November/December and final proposals and approval of the budget in February. The budget process is designed to ensure that MTFS estimates and assumptions are kept under review using latest information to inform the position for the next 4 years with a primary focus on the next financial year which is the only budget requiring formal approval. The budget process includes the following iterative elements:</p> <ul style="list-style-type: none"> <li>- Assessment of underlying demographic demands and cost pressures and forward projections of these based on current activity and current financial monitoring trends;</li> <li>- Assessment of current income collection &amp; recovery and performance trends;</li> <li>- Updated estimates of resources based on latest government information and announcements, and anticipated legislative changes including transfers of services in (new burdens) or out of local government;</li> <li>- Updated estimates of taxation resources based on latest monitoring information and government information and announcements, including consideration of any expected in-year surplus or deficit;</li> <li>- Estimates of inflationary pressures based on latest information and announcements, for example, from Local Government Employers (LGE) pay negotiations, reports from the Actuary on Pension Fund liabilities, tracking of indicators including RPI/CPI and other inflationary indicators, and consideration of legislative changes (e.g. known changes to employers National Insurance);</li> <li>- Iterative development and review of savings proposals to meet the latest estimated 'budget gap'. This is achieved by allocating 'working targets' to each directorate as a guideline for developing savings – normally taking some account of the relative scale of budgets and corporate priorities (e.g. providing relative protection to budgets for services to vulnerable people). Proposals are regularly reviewed by ELT and by members of the Administration through agreed and regular member oversight processes (usually led by the Lead Finance member). This ensures that member prioritisation and alignment with corporate priorities is built into the process.</li> </ul> <p>All elements are updated at least 3 times formally, often much more regularly, throughout the budget process.</p> <p>The impact of COVID-19 during 2020/21 is likely to fundamentally change the financial planning outlook for 2020/21 and future years subject to final levels of government emergency funding support and other measures adopted by government (e.g. allowing precepts or higher Council Tax rises or allowing local authorities to spread the repayment of COVID-19 deficits/debts over a long period of time e.g. 10 to 15 years). The situation is being monitored closely and updates taken regularly to P&amp;R Committee.</p>					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR20	<b>Failure to achieve health and social care outcomes due to organisational and resource pressures on the Clinical Commissioning Group (CCG) and Brighton &amp; Hove City Council (BHCC)</b>	Executive Director Health and Adult Social Care Head of Adult Social Care Commissioning Assistant Director - Integrated Services	BHCC Strategic Risk, Economic / Financial	13/05/20	Threat	Treat	<div>Red</div> <div>L5 x I4</div>	<div>Red</div> <div>L4 x I4</div>		Revised: Uncertain

#### Causes

Link to Corporate Plan 2020-23. Outcome 6: 'A healthy and caring city' and action to 'ensure that health and care services meet the needs of all' The high level Health & Wellbeing Strategy was formally adopted in March 2019 however there are still policy decisions that will need to be considered by the new council administration and fed through the Health & Wellbeing Board (HWB). The systems to deliver improved collaboration are made up of a number of organisations outside the council and there are competing drivers including budget and performance challenges which have been difficult to align. There are wider changes in NHS structures, e.g. the NHS geographical boundaries which are still a work in progress, have implications for an already complex health care system.

#### Potential Consequence(s)

If parties do not work together as effectively as required, or organisation's priorities change, it will affect delivery of performance targets. Any failure of delivery across the health and care system could impact on costs and pressures throughout the system and frustrate attempts to release efficiency savings and improve system performance.

#### Existing Controls

#### First Line of Defence: Management Controls

1. The CCG operates across 7 Primary Care Networks (PCNs). From April 2017 three Social Care District teams support these PCNs so that social care operational work is aligned.
2. Better Care Board established (high level and cross sector representation) and co-chaired by Executive Director Health & Adult Social Care and CCG Director of Commissioning, with oversight by Health & Wellbeing Board.
3. Health & Social Care Partnership Board (HSCPB) jointly chaired by CCG and BHCC meets monthly to identify and collaboratively plan for service delivery.
4. Health & Wellbeing Strategy adopted in March 2019.
5. Considerable collaborative operational working is being delivered within both the hospital social work teams and district adult social care teams (specifically east team working with PCNs).
6. 2nd Tier of Mental Health Integrated Services with Sussex Partnership Foundation Trust (SPFT) involve BHCC staff seconded to SPFT within the framework for the revised S75 agreement.

#### Second Line of Defence: Corporate Oversight

1. Health & Wellbeing Board reviewed and governance arrangements in place to help deliver a collaborative approach, including oversight of the Better Care Plan.
2. Better Care Plans in place. Section 75 agreed November 2019 and runs up to 31 March 2020.
3. Partnership work agreed and submitting an annual Better Care Plan since the deadline in March 2014. Revised Better Care plan for 2017-19 submitted and approved.

#### Third Line of Defence - Independent Assurance

1. NHS England signed Better Care Plan, submitted Nov 2017 (approved with 2 conditions, addressed).
2. Quarterly Better Care submissions to NHS England ongoing. There has not been any challenge back from NHS England.
3. Internal Audit - No specific Internal Audit work in 2017/18. In 2016/17 internal audit work reviewing the Better Care Fund gave Limited Assurance. of Controls - Partners' budgets are often determined by Government.

Reason for Uncertain status of Effectiveness of Controls - This risk is affected by changes affecting a number of organisations which contribute to the health care system.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Continue to develop and simplify Integrated Discharge Pathways with service users and their families, involving partners Brighton and Sussex University Hospitals NHS Trust (BSUH), SCFT, CCG, Independent Providers, Third Sector and other local authorities. New D2A (discharge to assess) pathway commenced 6/1/20.	Assistant Director - Integrated Services	80	31/03/21	01/04/16	31/03/21
<p><b>Comments:</b> May 20 update - in response to Covid-19 since March 2020 a multi-agency pathway hub was established to support and implement effective discharge pathways as agreed.</p> <p>Previous update at Oct 19 - revised Discharge to Assess (Home First) aka D2A pathways to be implemented in January 2020 with a performance dash board which is supported by NHS delivery as an adopted NHS programme. Performance is tracked in HASC Directorate Plan 1.4.5.2. Demand and Capacity is co-ordinated by the Operational Command Group and performance of Delayed Transfer of Care assessments is on target this is exceptional performance given the continued demand.</p> <p>HASC re-structure of Social Work teams aligned to new pathways was completed in December 2018. Further pathway re-alignment/simplification with partners has been requested. Workshops are planned from April 2020.</p>					
Further integration with Primary Care Clusters	Assistant Director - Integrated Services	55	31/03/21	01/04/16	31/03/21
<p><b>Comments:</b> May 20 update - because of Covid-19 this work is paused.</p> <p>Previous update at Oct 2019 - As part of new Targeted Operating Model (TOM) 'Better Lives, Stronger Communities' the implementation plan will be assessing lessons from Cluster 6 Pilot and inform Primary Care Networks (this is new term to retitle the existing Clusters). We are reviewing the hub model in community teams that moves us towards proactive demand management through improved and Multi Disciplinary Team (MDT) working in January 2020.</p>					
Plan Admission Avoidance with SCFT to extend delivery of social care responsibilities and enable more effective services	Assistant Director - Integrated Services	35	31/03/21	02/01/18	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> May 20 update - The focus of work has mostly been on discharge through the multi-agency discharge hub (involves BSUH, SPFT and BHCC) to utilise increased opportunities to divert clients as appropriate at the 'front door'. There has been a slight progression but focus of partners is diverted by Covid-19.</p> <p>Previous update as at Oct 2019 update - Reviewing the Hospital rapid discharge team to prevent admission, through 4 social workers working on the acute floor with nurses and therapists. The aim is by December 2019 to triage at the first stage to prevent admission to hospital where possible.</p>					

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	13/05/20	Threat	Treat	Amber L3 x I4	Amber L3 x I3		Revised: Adequate

#### Causes

Link to Corporate Plan 2020-23. Outcome 1 'A city to call home'.

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.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
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
<b>Comments:</b> The Housing Committee Work Plan 2019-23 is incorporated in the Housing, Neighbourhoods & Communities Work Directorate Plan and appropriate business plans. Regular reports on progress are made to Housing Committee and Performance reporting six monthly to P&R Committee. Links to reports are available on the council's website					
Effective implementation of affordable housing policy in the City Plan	Head of Planning	40	31/03/21	01/04/15	31/03/21
<b>Comments:</b> May 20 - Housing Delivery Action Plan put in place in August 2019 and being implemented and monitored. This is an action plan required by central government to address the under delivery of housing against planned targets. 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). Report introducing a framework of viability assessors was agreed by TECC Committee in January and will, due to changes in work priorities arising from Covid-19 response, will be implemented in the autumn. Proposed Submission City Plan Part Two agreed at Council in April for final stage of consultation and submission for examination. Consultation delayed due to Covid19. It includes a significant number of sites allocated and includes a policy on Build to Rent Housing. This will go forward for submission to the Secretary of State in early 21 following consultation. 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. Additional project underway to explore options to unblock delayed sites.					
Work through City Deal with regional partners & LEP to promote Economic development incl increased sub-regional working to meet housing need	Head of Planning	40	31/03/21	01/04/15	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> March 20 - Recruitment of a West Sussex and Greater Brighton project lead successful and due to start imminently. The priority will be to produce a work programme to prepare and adopt Local Strategic Statement 3 including commissioning evidence and setting up meetings to work across authorities.</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.</p> <p>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:</p> <p>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>					
Work with partners to address student housing needs	Head of Planning	95	31/03/21	01/04/15	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> March 20 - Report to TECC Committee in January 2020 confirming progress on the city wide Article 4 Direction following consultation and, agreed by councillors, that it will come into effect in June 2020. The submission City Plan Part 2 with it's supporting policies, agreed at in April 20. Consultation on the document is likely to be delayed due to covid-19 emergency measures which will delay adoption by up to 6 months. Collaborative working continues with close working between Private Sector Housing, Planning and other relevant Council Services at the 6-weekly PRS meetings. Focus on enforcement measures and appeals. Planning applications service continues to consider new applications for purpose built student housing and support implementation of consented schemes.</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
SR23	Unable to develop and deliver an effective Regeneration and Investment Strategy for the Seafront and ensure effective maintenance of the seafront infrastructure	Executive Director Economy, Environment & Culture Business Development Manager - Transport	BHCC Strategic Risk	13/05/20	Threat	Treat	Amber L3 x I4	Amber L3 x I3		Revised: Adequate

#### Causes

Link to Corporate Plan 2020-23: Outcome 2 'A city working for all', actions 2.5 'Develop our visitor economy'.

The seafront is a city asset which is iconic and contributes to the city's reputation. The council is the lead custodian of the seafront but the benefits are shared by many. At least 5 million people use our seafront every year. It is a very significant attraction in our visitor economy; provides a series of important public spaces for residents; many businesses in the city rely on the draw of the seafront to sustain their organisation's value and to provide an attractive place for stakeholders and employees. It is being used beyond its original design life and, in many ways, is a victim of its own success and affected by the changing patterns and increased demands of usage. Resourcing required to deliver a solution is not readily available and impacts on timing of delivery of any projects. There several ambitious capital, regeneration and investment projects along seafront in various stages of planning development, including the Waterfront project, Shelter Hall, the King Alfred. The deterioration of Madeira Terraces in particular have reached a critical point, requiring fencing and safety measures until a longer term funding is developed which is expected to cost £24 million. The council is proactive in bidding for Heritage Lottery Funds (HLF) but as at 3 January 2019 two bids have been unsuccessful. The City Council is the coast protection authority and is required to deliver coastal strategy studies, coastal protection, and flood defences in partnership with DEFRA and the Environment Agency. Management of climate events, long shore drift and the impact of climate change requires management and re-profiling of the shingle beaches, groynes and sea walls.

#### Potential Consequence(s)

Without adequate investment the seafront will decline in popularity and impact on the visitor economy and the city and regional economy with potential to affect:

1. the heritages structures and infrastructure along the seafront which require significant investment and ongoing revenue in order to ensure suitability for modern use
2. preservation of the reputation of the city and enhancing its offer and protecting the visitor economy
3. the A259 highway and associated structures, such as the seafront arches and sewage infrastructure which could have an impact upon our transport systems and economy, and effect sewage and foul water management in the city centre
5. management of the impact of climate events and long shore drift upon the city's beaches which would lead to reduction in amenity space impact upon the visitor economy and profitability of small businesses
6. provision of adequate sea protection measures which could lead to coastal flooding impacting upon residents, businesses and visitors.

#### Existing Controls

#### First Line of Defence: Management Controls

- 1) Strategic Delivery Board has been established and is actively considering seafront redevelopment opportunities including the Black Rock and King Alfred sites. Project managers provide a monthly report of all projects to the Strategic Delivery Board.
- 2) Department for Transport (DfT) funding secured for the redevelopment of the West Street / A259 Junction and Shelter Hall. Initial infrastructure work commenced late 2015.
- 3) Annual special inspection report on the condition of Madeira Terraces undertaken by Structural Engineering consultants.
- 4) PR&G approval in December 2018 to enter into a conditional land acquisition agreement with Aberdeen Standard Investments for the Brighton Waterfront Project.
- 5) Late 2017 the Save Madeira Terrace crowd funding campaign raised £460K to restore the first three arches and the project is commencing.
- 6) PR&G in January 2019 considered a development agreement for the King Alfred site.
- 7) Physical (weekly and monthly) Inspections of 12km of Coastline and Sea Defences undertaken by Coast Protection Engineer.
8. Seafront Structures supporting the A259 are routinely maintained and restored utilising funding via the Council's LTP annual capital programme.

#### Second Line of Defence: Corporate Oversight

1. Quarterly monitoring of strategic management of the council's investment in the seafront through the Greater Brighton Economic Board and the Member led Strategic Delivery Board, underpinned by the Officer led Corporate Investment Board (capital) and Modernisation Board (revenue).
2. Member oversight by Regional Flood & Coastal Defence Committee, facilitated and Chaired by Environment Agency.
3. Coast Protection solutions and projects delivery by service lead officer.

#### Third Line of Defence: Independent Assurance

1. Projects funded by Government departments are overseen by the Greater Brighton Economic Board (quarterly) and Coast to Capital LEP governance arrangements (quarterly) / and by relevant government department (according to their timetable). No funding has been withdrawn to date.
  2. DfT, C2C LEP and TfSE funded schemes will be scrutinised by their respective regional officers
  3. Internal Audit - Internal audit review of Seafront Investment Strategy (Strategic Risk 23) Reasonable Assurance - December 2018. Internal Audit work on the Waterfront Project in 2017/18. Some independent assurance on this risk is also provided by the Greater Brighton Economic Board (quarterly) and Coast to Capital LEP.
- 2016/17 audits were Valley Gardens and Shelter Hall (Limited Assurance)
4. Coast Defence includes oversight of B&H's Coastal Defence Strategy and agreement of Business Cases by Environment Agency and DEFRA.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Bring forward key development sites that form the City Regeneration Programme: - Waterfront project - King Alfred  <b>Comments:</b> - Waterfront: ASI looking at central site viability, and considering how the sites relate to each other. May require a standstill agreement to the CLAA while this issue is addressed. Package of enabling works being pursued on Eastern site to secure LEP funding. - King Alfred Housing - Project has been closed down due to Crest withdrawing. Options being looked at, but likely to result in project being delayed for a number of years.	Assistant Director - City Development & Regeneration	10	31/03/20	01/04/19	31/03/20
Deliver a phased programme of works to manage and improve highways and structures related to the seafront  <b>Comments:</b> Delivery of the programme of improvement works for highway and coastal protection structures along the seafront is implemented utilising the results of the annual inspection programme undertaken by the council's transport projects and civil engineering team. The improvement works programme is funded utilising the City Council's Local Transport Programme (LTP) and external party funding such as DfT and section 106/278 funding. To date, a significant bid for £20M has been submitted to the DfT to fund improvement works to the seafront arches supporting the A259, as the route has been newly designated a Major Roads Network by the Transport for the South East. The outline business case for the improvement of the City's coastal protection assets has also been submitted to the Environment Agency, which will provide new and improved coastal protection. An update on this funding will be provided in the first quarter of 2020.	Assistant Director City Transport	65	31/03/21	01/08/16	31/03/21
Flood and Coastal Erosion risk management - complete the feasibility and detailed design work prior to implement the Brighton Marina to River Adur coastal protection scheme undertaken in partnership with the Environment Agency (EA), BHCC, Adur District Council, Shoreham Port Authority. The scheme proposes new and improved groynes, seawall and beach profile management, to improve coastal protection for the seafront arches, promenade, A259, southern storm water sewer, city main foul and storm wat	Assistant Director City Transport	50	28/02/22	01/04/18	28/02/22

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> The response to comments from the Environment Agency (EA) with regards the submission of the outline business case, is being finalised. Council approval is being sought for the procurement and award of the detailed design and construction contracts within spring/summer 2020. Subject to approval, the award of the detailed design contract is proposed for the autumn of 2020.</p> <p>Further conversations with the EA have been undertaken to discuss the opportunity of additional EA funding, to accelerate the initial delivery phase of the scheme.</p>					
Implement high priority actions from the structural engineering report	Assistant Director - Property & Design	75	31/03/21	03/01/19	31/03/21
<p><b>Comments:</b> Implementation of higher priority works have been done. The next phase of works relate to propping and the proposals are in planning, Listed Building consent at the moment. Annual report is available and prioritisation funding for the annual planned maintenance works 19-20 has been to be agreed. This will provide information about any that are not being implemented due to financial restrictions or practically due to construction details.</p>					
Subject to partnership matchfunding carry out work within 5 years, linking to Council medium term financial strategy	Assistant Director City Transport	20	01/01/25	01/05/19	01/01/25
<p><b>Comments:</b> The council has submitted a funding bid of £20M to Department of Transport as part of the new designation for the A259 in the city as 'Major Route Network', this is being facilitated and prioritised by Transport for The South East (TfSE). In July 2019 we submitted our bid to TfSE for onward submission to DfT. The schemes would begin, if successful, within the financial year 2020/21 for approx. 5 years duration.</p>					
The crowd funding campaign for the renewal and upgrading of the first three arches was successful, we now need to implement the project and spend the funding.	Assistant Director - City Development & Regeneration	20	31/03/20	22/12/17	31/03/20



Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> Funding agreed to progress design work to get the project started. This will look at first 30 arches, but delivery will be of between three and thirty arches.</p> <p>Procurement of design team has started, complex process taking 6 to 9 months.</p> <p>Advisory Group has been formed and has met twice.</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 needs and demands for services arising from the changing and evolving landscape of Welfare Reform is not effectively supported by the council.	Deputy Chief Finance Officer Revenues & Benefits Manager	BHCC Strategic Risk	13/05/20	Threat	Treat	Amber L4 x I3	Amber L3 x I3		Revised: Uncertain

#### Causes

Link to Corporate Plan 2020-23. Outcome 2: 'A City Working for All', actions '2.1 Build community wealth'

Covid-19 has meant significant economic, business, social and welfare impacts on how Brighton & Hove City Council (BHCC) and its partners provide support and rollout Universal Credit (UC). There are increasing implications for staffing levels within services; rent collection; council tax collection, and pressures on social services and homeless services.

This links to the planned gradual process for all Housing Benefit claimants to move across to Universal Credit (UC) between 2019 and 2024. which was informed by an 18 month work programme with the Local Government Association (LGA).

#### Potential Consequence(s)

Covid-19 has meant BHCC and partners approaches have changed immediately, the medium and long term delivery arrangements are to be determined as the impacts evolve

The lead agency for UC is the Department for Work and Pensions (DWP) who have adapted and streamlined their processes and brought in extra resource to process claims.

Increased service pressures on housing and social services.

Greatly increased volume of Universal Credit claims – at the start of the lockdown, there were as many claims, nationally, in one weekend (around 500,000) as are usually received in one month.

Increase of food poverty, money flow, building rent arrears, growing Council Tax arrears

People out of work may now have their benefit capped (for those in work there is no cap)

Significant extra pressure on discretionary budgets.

Decreased rent and Council Tax collection.

#### Existing Controls

First Line of Defence: Management Actions

Covid-19 update - existing controls are denoted by alphabetic bullets

First Line of Defence: Management Controls

Covid-19 mitigations include:

- a) BHCC Local Discretionary Social Fund provides assistance with emergency food vouchers, fuel etc.
- b) Community Hub set up at BHCC to deal with requests for help from the public. Referral routes now established to welfare rights, money advice, food banks
- c) Links established with Community & Voluntary Sector (CVS) at a strategic level to ensure an appropriate city wide response
- d) BHCC implementing government measures, e.g. increasing amount of Universal Credit and Tax Credits, and allowing up to an extra £150 (as at April 2020) for Council Tax Reduction recipients
- e) BHCC playing its part in delivery of Government support for businesses, including the Business Grants systems
- f) BHCC Benefit Cap (Welfare Reform) team will deal with new cases coming in, as per current procedures

BHCC regular non-covid defence existing controls are denoted by numeric bullets:

1. BHCC Welfare Rights, Welfare Reform and Discretionary Help and Advice teams monitor welfare changes and coordinate a corporate response to them
2. A new work programme for ongoing delivery has been established with a small number of other Local Authorities and the LGA to improve our approach to financial support across the authority
3. Ongoing meetings are held with Department for Works Pensions (DWP) about change to Universal Credit (UC) and how we respond to vulnerability
4. Council Tax Reduction (CTR) rules can be set and changed by the BHCC and have been reviewed for the 2020/21 year. It was decided that no changes to the scheme 2020/21 but the budget for additional discretionary help with Council Tax Reduction was 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
5. BHCC has other discretionary funds 2018-20 which as at January 2020 (Discretionary Housing Payments and Local Discretionary Social Fund) have

exceeded their allocated budgets and will be reported for Member decisions

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:

1. 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

2. Executive Leadership Team (ELT) Full Council, Policy & Resources Committee 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: The significant economic, business, social and welfare impacts of Covid-19 and the existing known difficulties for BHCC and its partners to deliver welfare reform, e.g. inability to project accurately the number of families who may require extra assistance from the agencies either in terms of housing need or increased demand for other services. Previous experience suggests that some may 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 - casework support programme to support people affected by the benefit cap	Revenues & Benefits Manager	70	31/03/21	01/06/15	31/03/21

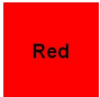

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> 1. Team helps people who have been Benefit capped to find work/access training and support / claim relevant benefits and assistance in order to come off the Benefit Cap.</p> <p>2. Work is ongoing, because new people are capped regularly. However, before Universal Credit, there was advance warning of who would be capped because it would require their Housing Benefit to be reduced. Now, the Benefit Cap is applied directly by the DWP to Universal Credit, and the council only becomes aware if an individual presents to us (e.g. Hardship cases).</p> <p>3. A JobcentrePlus work coach is embedded within the BenCap team - joint working to resolve cases.</p> <p>4. The Discretionary Payment Scheme (DHP) supports people to pay their rent in the short term, while the council supports them to come off the benefit cap or find employment, etc.</p> <p>5. The 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 2020-21, so the risk end date has been extended to 31/03/21. The risk percentage remains the same because there is less control in the Local Authority (LA) over caseload than previously. The DWP does not provide lists of people on UC who have been benefit capped, so it is harder to identify them.</p> <p>9. A revised Welfare Approach has been approved in principle by ELT and Policy &amp; Resources Committee (Nov 2019). This aims for a more holistic approach to Welfare Support including Welfare Rights by restructuring the service within the Revenues &amp; Benefits service and creating stronger links with other support teams in Housing, Communities, and across social care. A Welfare Board will be introduced, led by an Executive Director, to oversee implementation of the new Welfare Approach, taking into account the impact of COVID-19.</p>					
Consider the implications for any new Council Tax Reduction schemes for future years and a new model and to further simplify the approach.	Deputy Chief Finance Officer	10	31/03/21	23/04/20	31/03/21
<p><b>Comments:</b> To be considered in line with HM Government Covid-19 initiatives . Work around developing possible changes for Council Tax Reduction (CTR) is now delayed due to the impact of Covid-19. Presently unknown if it will be possible to move to a different model for 2021, or whether the council's focus will remain on the Covid-19 response.</p>					

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
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
<p><b>Comments:</b> The new Welfare Board will set out structure and strengthen links.</p> <p>There are 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. There are also strong links with the local Jobcentre Plus via a DWP partnership manager, Jobcentre managers and work coaches. Welfare Rights staff reach out via the Advisory Services Network into the voluntary advice sector and provide training for council teams and external advisors.</p> <p>The risk end date has been 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 were 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 2024. They have not set a timetable, so it is not known 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 there is no information available at present.</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>• There is advanced DWP joint working embedded in the Welfare Support service, and as an ongoing outcome of the Housing Trailblazer project. Also, at a strategic level the services co-ordinates with a DWP partnership manager, alongside the CVS, to monitor the council's response to UC, and to identify issues of local or national significance.</li> <li>• The council is part of a Complex Needs Stakeholder forum hosted by the DWP to identify ways of assisting people who have difficulty accessing UC. The risk end date has been extended to 31/03/21, because the government timetable has slipped and managed migration of UC is unlikely to happen in 2020.</li> </ul>					
Provide policy options and author reports to give members options on policy issues e.g. Council Tax Reduction	Revenues & Benefits Manager	15	31/03/21	01/04/15	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> The council is 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 July 2020. The council is 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 broader plans for developing the financial support offer, incorporating the welfare reform agenda.</p> <p>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 during 2020 depending on the ongoing impact of COVID-19, with a view to consultation in late summer 2020 if at all possible, and progression through committee and full council in time for implementation in April 2021.</p> <p>The response and 'offer' in relation to welfare support will also be reviewed and mapped as part of the work of the new 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
SR25	<b>The lack of organisational capacity leads to sub-optimal service outcomes, failure to meet statutory obligations, and reputational damage</b>	Head of Human Resources & Organisational Development Deputy Chief Finance Officer Head of Policy, Partnerships & Scrutiny	BHCC Strategic Risk, Professional / Managerial	13/05/20	Threat	Treat	 L4 x I4	 L3 x I4		Revised: Uncertain

#### Causes

Link to Corporate Plan 2020-23. Attributes 7 'How will the plan be delivered' actions to achieve 'A well run council', action 7.2.

Loss of resilience of organisation due to pace of change, reduction in staff numbers, changing staff and loss of knowledge and history are further stretched by Covid-19 in terms of meeting delivery of the response and recovery.

Expectations over the services that the council is able to provide and the way in which they are provided.

#### Potential Consequence(s)

- \* Capacity to undertake change work to design high quality services is lost
- \* Negative impact on fulfilment of statutory duties
- \* Partnership working becomes more fragile as a result of personnel change and there may be different arrangements as a result of Covid-19
- \* Personal resilience tested by increased workloads leading to potential stress and sickness
- \* Difficulty of recruiting staff to key posts as a consequence of the rapidly increasing costs of living in the city
- \* Working methods change after experience of Covid-19

#### Existing Controls

#### First Line of Defence Management Control:

1. Business Improvement team and Digital First programme seek to make processes more efficient.
2. Management capacity and capability being enhanced by new Behaviours Framework and Management Development Programme.
3. Adverse operating conditions are identified and intelligence received from the Staff Survey , and plans in place to mitigate these.
5. Human Resources & Organisational Development (HROD) activity has been pulled together into single 'People Promise' to ensure staff-related initiatives are better co-ordinated.
6. Business Planning process including Directorate Plans to identify key priorities.
7. Some statutory Performance Indicators (PIs) are Key PIs and are reported regularly to ELT, quarterly or annually.
8. Other Management Information for example from the annual Staff Survey highlighting areas for focus.
9. HR Business Partners support Directorate Management Teams (DMTS) to monitor staff absence & welfare including managers' compliance with: regular 1 to 1s, return to work interviews and record keeping on Firstcare. This include regular data insight reports bi-annually.
10. HR policies and arrangements in place to address concerns of both management and staff, e.g. Occupational Health Referral newly procured with provider operational across Orbis partners; whistle-blowing; and PDP guidance for managers.
11. HR & OD organised consultative groups have developed a council Behavioural Framework approved by ELT in November 2016. This sets expectations of standards of behaviour and performance.
12. HR Business Partners assist DMTs to determine any necessary interventions to improve service capacity.
13. First Care Solutions introduced 1 December 2018 as a pro-active absence management solution.

#### Second Line of Defence Corporate Oversight:

ELT and City Management Board exchange details of working arrangements and changes to key personnel across organisations.

ELT tasked with taking stronger cross-City leadership role, e.g. with universities and the health sector.

Actions following Budget Stress Testing exercise including Managing Demand across Orbis services.

Portfolio of modernisation projects and programmes enabling increased organisational capacity such as ICT infrastructure, Business Improvement, Digital First, Workstyles, People and Culture Change.

People Plan overseen by ELT, Leadership Board, and Policy & Resources Committee.

[Will require updated approach depending on proposals for new MTFS through a priority-based budgeting process].

#### Third Line of Defence Independent Assurance:

Internal Audit on Organisational Capacity in September 2017, opinion 'Partial assurance'. From 2019/20 key action is that budget process will include capacity as a key consideration.

#### Reason for Uncertain Status of Effectiveness of Controls

Budget decisions will impact on the capacity of officers' capacity to deliver stated outcomes

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
HR & OD delivery of management development programme to enhance capacity of first 4 tiers of staff	Head of Human Resources & Organisational Development	50	30/09/20	02/01/17	30/09/20
<b>Comments:</b> Covid-19 has disrupted the roll-out of the programme which was planned to be fully rolled out from April 2019 through to March 2020. The initial modules have had excellent feedback from participants, and some changes to the challenge and collaboration groups have been made in response to feedback. The success of the full programme will be measured by the quality of leadership in the organisation, including the management scores in the staff survey.					
HR work with others on our people strategy (Our People Promise) taking into account organisational needs and informed by our staff survey, corporate plan and our workforce data	Head of Human Resources & Organisational Development	75	31/03/21	01/04/16	31/03/21

**Comments:** Covid-19 has impacted on progressing work but will be reviewed and implemented in the context of post-Covid-19.

Modernisation funds secured to progress the work to develop and implement actions from Our People Promise for 19/20 and 20/21. The Leadership Development performance appraisal system continues to be embedded, and the 360 mid-year appraisal process has been completed with reports issued to tier 1-4 leaders. All members of the leadership network have been through a rated appraisal process, and moderation of the results took place between September and December. The leadership development programme is underway with 3 mandatory elements being rolled out: 'Inspirational communications', 'holding challenging conversations' and 'working with members'. Feedback from these modules has been excellent.

The wellbeing work stream has been reviewed and work around mental health and physical activity has been prioritised. The next wellbeing survey will run in January 2020, and the outcome of this will be used to shape the next steps for the wellbeing agenda. The sickness procedure was approved at P&R on 10th October, and an implementation plan is now underway which will include training for managers. The new attendance and wellbeing team in HR has been established and is working to target activity according to FirstCare attendance data, and in response to the increase in sickness in certain areas of the council. This increase has been caused largely by an increase in absence attributable to stress and mental health in certain parts of the Council.

The Action plan for the Fair and Inclusive work is underway, and was approved at P&R on 10th October. Collaboration with TU's and workers forums continues to co-create the plan to improve the organisations management of equality and diversity. Agreement has been reached to offer 2.5 days release for the co-ordinator of the BMEWF to support the progression of the work within the plan, and provide time to ensure the necessary engagement with the forum. This release will start in January 2020.

Action plans for the staff survey have been developed within services, and the corporate action plan has been approved by ELT.

P&R approved on 10th October a series of proposals to improve our reward offer to staff. These include an annual leave purchase scheme, rental loans scheme, pension awareness session, shared cost Additional Voluntary Contributions and pay protection for medical redeployees. Implementation of these proposals is underway.

All of the above further improve the employment offer, and support increased morale and motivation, as well as supporting.

Next steps:

1. Further target support for wellbeing in response to detailed analysis of sickness data, and the outcome of the well workforce survey (HR Lead Consultant , March 2019)
2. Launch 'we need to talk about race campaign' (Internal communication manager, January 2019).
3. Implementation of the reward changes (Lead Consultant, Reward, Policy and Projects Team March 2020).

Measures of success:



Deliver specified and non-cashable benefits for the project/programme (March 2020).

10 % improvement in staff survey results against 'I feel valued by my employer' question (Staff Survey – May 2019).

10% improvement in equality data regarding representation of staff with a protected characteristic (March 2020).



Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Internal Audit review completed in September 2017. This flagged a greater need to focus on resource implications, rather than the council keeping everything running, sometimes carrying greater risks.</p> <p><b>Comments:</b> Post Covid-19 will be an opportunity to review capacity. Capacity was included as part of budget process for 2019/20 and 2020/21. It is difficult to ascertain the cost of statutory versus discretionary services because many activities span both. A more detailed priority-based budget process is being pursued to create the new Medium Term Financial Strategy from 2020/21 - planning has commenced for this, as has work to identify the resources required for core risk management around activities such as Health &amp; Safety and Information Governance. It has been acknowledged by the Audit &amp; Standards Committee that a No Overall Control political balance makes closing down services that may be near to being unsafe or unviable is not straight forwards. A Member Working Group has been set up to look at managing workloads.</p>	Deputy Chief Finance Officer	70	30/09/20	06/10/17	30/09/20
<p>Some corporate services have integrated into Orbis partnership following conclusion of Inter Authority Agreement (IAA) in May 2017. Most services fully integrated in terms of management, however position in Surrey could potentially affect full integration of Finance and HR in the future. In addition decisions on HR, Finance, and Property mean that full integration of these services now will not happen. Efforts will continue with East Sussex on HR and Finance.</p> <p><b>Comments:</b> It is considered that ongoing integration (with the exception of Property) between Brighton &amp; Hove and East Sussex is desirable. A challenge remains on disaggregation of budgets, and a refreshed set of management arrangements from November 2019.</p>	Deputy Chief Finance Officer	90	31/03/21	13/10/16	31/03/21

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.	Deputy Chief Finance Officer Procurement Strategy Manager	BHCC Strategic Risk, Contractual / Competitive	13/05/20	Threat	Treat	 L3 x I4	 L3 x I3		Revised: Adequate

Causes

Link to Corporate Plan 2020-23. Attributes 7 'How will the plan be delivered' actions to achieve 'A well run council'.

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'.

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	Deputy Chief Finance Officer	30	31/03/21	14/03/19	31/03/21
<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'.	Deputy Chief Finance Officer	60	31/07/20	07/04/17	31/07/20

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> Since Full Council approval for £1.2m investment in Contract Management resources approved on 23 Feb 2017 actions to date have delivered savings and efficiencies but in 2020/21 will review how to take function forwards in light of limited funding from April 2020 - Head of Procurement will work with individual Exec Directors.</p> <p>Actions taken include:</p> <ul style="list-style-type: none"> <li>- Recruited extra staff.</li> <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> </ul>					
Initiate mandatory contract management training linked to contract management e-learning	Deputy Chief Finance Officer	10	31/03/21	14/03/19	31/03/21
<p><b>Comments:</b> The e-learning modules will be introduced in June 2020. These will be targeted at all contract managers. Reports will be prepared for ELT. The reports 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>					

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Publicise importance of contracts being well managed and the development of contract management where performance has not met expectations	Deputy Chief Finance Officer	50	31/03/21	14/03/19	31/03/21
<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.					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR30	Not fulfilling the expectations of residents, businesses, government and the wider community that Brighton & Hove City Council will lead the city well and be stronger in an uncertain environment	Chief Executive	BHCC Strategic Risk	13/05/20	Threat	Treat	Amber L3 x I4	Amber L2 x I4		Revised: Adequate

#### Causes

Link to Corporate Plan 2020-23. 7 Council Attributes 'Working in Partnership', actions 7.7

Fulfilling the expectations of business, government and the wider community that Brighton & Hove City Council will lead the city well and be stronger in an uncertain environment. Whilst the council has already established effective partnership arrangements to benefit the city such as Brighton & Hove Connected <http://www.bhconnected.org.uk/>, the City Management Board (CMB) find out more via <http://www.bhconnected.org.uk/content/city-management-board>; Greater Brighton Economic Board (GBEB) find out more via <https://greaterbrighton.com/about-us/introducing-the-economic-board/>) and wider city regional based leadership, if it does not 'step up to the mark' and embrace its role for Placed Based Leadership the council may be perceived as less relevant to business and wider community and others due to factors such as:

1. Brexit's implications & opportunities for the city's economy resulting from the UK exiting the EU given the current trade profile where 45% of Brighton & Hove's trade is with the EU and 79% of this service is service exports. Brighton & Hove is the 9th largest city in the UK for the value of service exports per job (source: Centre for Cities, How do cities trade with the World? April 2019)
2. Other economic uncertainties include the changing shape of retail and the high cost of housing affecting recruitment and retention of workforce across all economic sectors
3. Reduced council expenditure and changes to the traditional municipal model

#### Potential Consequence(s)

- \* Our civic institutions are unable to provide effective leadership to the city
- \* Adverse impact of economic uncertainty and social change on wellbeing, community cohesion and opportunities for citizens so that City Wealth reduces
- \* Business cannot grow
- \* Inequality grows
- \* Fragmentation of communities
- \* Fragmentation of framework for public service institutions
- \* Uncertainty over long term funding and rising health and social care demands makes delivery of public services very challenging
- \* Lost opportunity to position the city as a positive place to attract businesses and employees who will benefit city growth
- \* Reputation of council suffers as civic leadership role in the city
- \* Citizens and businesses have less confidence in engaging with the council

#### Existing Controls

#### First line of defence: Management Controls

1. Full Council
2. Policy & Resources (PR) Committee has oversight of key budget and policy decisions and all reports have a financial, legal and community impact assessments.
3. Health & Wellbeing Board have similar assurance functions as the PR Committee.
4. City Management Board are not decision making but they are important influencers and it is an effective way of putting strategic issues on the radar of public authorities (find out more via <http://www.bhconnected.org.uk/content/city-management-board>)
5. Audit & Standards Committee have a role to monitor the effectiveness of risk management and internal control
6. Brighton & Hove Connected (link as above) a network of community & voluntary organisations and businesses in the city and works in an effective way to engage communities on issues of interest.
7. Royal Society of Arts, Manufacturing & Commerce ('RSA') were commissioned to work with political and managerial leadership
8. Corporate governance and processes to manage existing council business, eg Performance Management Framework (PMF).

#### Second Line of Defence: Corporate Oversight

1. Local Government Association (LGA) Peer Review and ad-hoc advice.
2. Two Independent Persons on the Audit & Standards Committee.
3. Greater Brighton Economic Board, rotating chair representing each partners oversees and makes decision on strategic issues relating to regional economic development (find out more via <https://greaterbrighton.com/about-us/introducing-the-economic-board/> Wider city region based leadership).
4. Corporate Modernisation Delivery Board and the Executive Leadership Team (ELT) oversee the application of the Performance Management Framework (PMF).
5. Policy Chairs Board oversight of issues of policy.

#### Third Line of Defence: Independent Assurance

1. HM Government
2. External Audit reviews of financial position of the city council - June 2019.
3. Inspectorate reports e.g. Ofsted 2018 - Children's Services - Good Judgement
4. Internal Audit - 2017/18 and 2018/19 No independent assurance work has been carried out on this risk.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Agree a Corporate Plan and Budget Strategy which clearly communicates policy priorities, funding and resourcing	Deputy Chief Finance Officer	50	30/11/20	07/01/20	30/11/20

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<b>Comments:</b> Corporate Plan and Budget will be signed off by Full Council (Budget Council) in February 2020, the links between Corporate Plan and will be revisited in November 2020 following announcement of government's final settlement. The Orbis partnership arrangements continue to provide increased support services resilience e.g. finance, audit, procurement, IT&D.					
Communicate the council's activity to enable the city's strong prospects as healthy place to live, work and do business, able to withstand challenges and grasp future opportunities	Head of Communications	50	31/03/21	10/01/19	31/03/21
<b>Comments:</b> This is a significant time for this risk. Work is taking place as follows:  1. A new Corporate Plan to convey the council's clear corporate narrative and tangible deliverables for the city was approved by Full Council in December 2019. 2. Work to communicate performance delivery of the council's priorities and targets was started in early 2020 but was paused because of Covid-19. 3. Work on this is resuming in Summer 2020 providing no further serious outbreaks of Covid-19 occur.  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.					
Continue effective collaboration with health & social care within the city	Executive Director Health and Adult Social Care	70	31/03/21	14/02/17	31/03/21



Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> May 20 update: There is established focus on effective collaboration between the council, NHS partners and the voluntary and community sector. The Integrated Care Partnership system enabled Sussex to be approved by HM Government as a Sussex wide Integrated Care System. This means that each place, East and West Sussex and Brighton &amp; Hove, will develop their integrated partnership working arrangements to be monitored by the Integrated Care Partnership. This will involve review as a result of the post Covid-19 position.</p> <p>February 20 update: With the adoption of the HWB Strategy and its preventative focus under the 'Four Wells' (starting living, ageing dying) there is a commitment to improve our outcomes for residents. However this presents challenges within the current financial NHS Long Term Plan, was submitted to Central Govt in Nov 19 and an aligned delivery framework will need to be developed and updated on an annual basis. There is currently a review of the HWBB on its membership and purpose (as at Jan 2020).</p>					
Develop a strong lobbying strategy to effectively influence government	Head of Policy, Partnerships & Scrutiny	50	31/03/23	07/01/20	31/03/23
<p><b>Comments:</b> Lobbying strategy presented to Policy Chairs Board in February 2020. Continued development with the Leader and the Executive Leadership Team to identify and take forward priorities.</p>					
Develop Customer Service Standards and reporting against these standards	Head of Performance, Improvement & Programmes	50	31/03/21	12/02/20	31/03/21

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. 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 learning from feedback. 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 3 2019-20 data, complaints numbers are broadly same as last year, compliments increasing and escalation of complaints broadly has remained the same.</p>					
Develop Stronger Families agenda and other measures to reduce pressures on family life	Acting Executive Families, Children & Learning	85	31/03/21	14/02/17	31/03/21

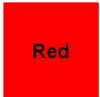

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> The Stronger Families Stronger Communities programme (the local Troubled Families programme) is in its sixth year of operation supporting improved outcomes for families with complex problems and delivering targeted family support to families before their issues become entrenched. We achieved earned autonomy status in 2018 with upfront funding instead of payment by results. This has allowed us to expand our family support work for primary schools and develop support for parental conflict. In March 2020 we reached our five-year target for Phase 2 of the Stronger Families programme. Successful outcomes were recorded for 1947 families meeting our target of 85%.</p> <p>The Troubled Families (TF) programme has been extended until March 2021. Locally, alongside reductions in core funding for early help interventions, there remains a financial risk from 2021 onwards</p> <p>In January 2020 a Local Government Association peer review, commissioned by the Whole Family Partnership Board, made recommendations for the further development of whole-family work across the city. These include building on existing partnerships, strengthening governance, raising the profile of whole-family working, demonstrating impact and developing shared ownership of the future direction. Fundamental to this will be the strategic importance of the Whole Family Partnership Board and the commitment of key partners such as Sussex Police and the B&amp;H Clinical Commissioning Group. These findings will be used to review and update the Whole Family Working Strategy.</p> <p>We are also required as part of the TF programme to conduct an 'Early Help Systems Review', due in September 2020. This will focus on the extent to which the Early Help system and services are using whole-family assessment, planning and support. A further plan for development and sustainability is required by January 2021, with the implication that any future funding in this area will be allocated accordingly.</p>					
Develop the city's physical assets, social and environmental infrastructure	Executive Director Economy, Environment & Culture	75	31/03/20	14/02/17	31/03/20

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> Strategic Delivery Board is overseeing the City's Investment Programme of regeneration and infrastructure projects. Circus Street mixed- use regeneration scheme development agreement become unconditional and full construction commenced August 2017. Corporate Investment Board provides officer oversight of the investment programme. Updates on Major Regeneration Projects are provided as a standing item to Tourism, Equalities, Communities &amp; Culture (TECC) Committee.</p> <p>Greater Brighton Economic Board has established an Infrastructure Panel that is overseeing the development of Energy and Water Plans for Greater Brighton.</p> <p>Preston Barracks planning permission approved by Planning Committee subject to conditions September 2017. s.106 agreed December 2017. Conditional Land Agreement reached unconditional January 2018. Full construction commenced Summer 2018</p> <p>Phase 2 Seafront Arches completed and Phase 3 (Shelter Hall) in construction - September 2017. Completion late 2019</p> <p>Housing Living Wage Joint Venture business Plan approved by PRG Committee - October 2017. Joint Venture legal documents agreed December 2017. Planning applications for first two sites approved Summer 2019.</p> <p>Road infrastructure works ongoing (North Street and Elm Grove/A259 junction) -completed December 2017</p> <p>Cross Party Asset Management Board established - September 2017</p> <p>Valley Gardens Phase 1 and 2 construction commenced October 2018.</p> <p>Valley Gardens Phase 3. Outline design approved by ETS Committee January 2019. Funding approved by C2C LEP Board subject to funding conditions December 2019. Funding agreement conditions agreed by LEP Board Oct 2019. Funding Agreement to be signed December 2019.</p> <p>Brighton Waterfront. Conditional Land Acquisition Agreement to be signed April 2019.</p> <p>Greater Brighton Economic Board agreed Digital Infrastructure Plan - October 2019</p> <p>Greater Brighton Economic Board supporting Coast to Capital LEP with development of their Local Industrial Strategy.</p> <p>Next Steps:</p> <ul style="list-style-type: none"> <li>- Agreement of Conditional Land Acquisition Agreement for Brighton Waterfront Project - December 2018</li> <li>- PRG Committee to consider development agreement for King Alfred redevelopment - December 2018</li> <li>- Major projects and investment programme update reported to Strategic Delivery Board and Tourism, Development &amp; Culture Committee - Ongoing</li> </ul>					

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Ensure effective performance management systems to deliver impact and Value for Money	Head of Performance, Improvement & Programmes	60	31/03/23	07/01/20	31/03/23
<b>Comments:</b> The Performance Management Framework (PMF) is operating well across the organisation. Performance information regarding all 8 elements of the framework gets regularly updated and reported to senior managers. Dashboard gets produced collating information about all 8 elements and summarising in an easy to understand format which gets published on intranet/wave to ensure transparency. Priority areas of focus gets identified and resources are then deployed as appropriate to address these. PMF is also now part of mandatory manager induction sessions.					
Improve community cohesion and leadership profile with communities, incl the introduction of community hubs & neighbourhood governance.	Interim Executive Director, Housing, Neighbourhoods & Communities	75	31/12/19	14/02/17	31/12/19
<b>Comments:</b> Links to NCH Directorate Objective 5 Improve community well-being & resilience. Directorate Plan Action 5.9 Increase social capital within communities of identity and place and collaborate working between communities and the council through training and development for staff on working with volunteers and communities, and supporting the delivery of neighbourhood hubs. Progress update - Neighbourhood Action Plans for Moulsecoomb & Bevendean; Hangleton & Knoll; Portslade and East Brighton are operating and are discussed at quarterly meetings with the communities. Other additional NAPS are also in development with progress as at 8 April 2019 as follows: a) Hollingdean in final stages of development; Hanover & Elm Grove - consultation on content of NAP out to community for consultation; Queens Park under development. Once these new NAPS are in place, quarterly meetings will be scheduled to ensure staff work with the community to deliver NAP outcomes. In addition, an Upstanders network is being developed that brings together representatives of different communities of identity to develop positive action to counter divisive and harmful incidents in the city and build community cohesion.					
Lead Strategy, Governance & Law services to increase the socialisation of public policy within the city	Executive Lead Officer Strategy, Governance and Law	50	31/03/21	14/02/17	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> Work has taken place to involve key partners across the city from all sectors to develop a City Vision for 2030. This is completed and the City Council's Corporate Strategy started March 2019 resulting in adoption of the Corporate Strategy in Autumn 2019. Directorate Plans have been developed to clarify plans for delivery against which progress will be monitored as part of the Performance Management Framework. The Corporate Policy Network will review coordination of a number of strategies across the organisation, the experience of Covid-19 and post-Covid-19 recovery and links with partner agencies to ensure alignment. The City Management Board is in place coordinated by the Policy, Partnership &amp; Scrutiny (PPS) team. There are a number of partnerships such as transport reporting to the City Management Board and PPS are developing a policy framework across all directorates.</p> <p>Socialising the council's policies does not exclusively relate to the Corporate Strategy, there are many other policies which require appropriate publicity through and communication programmes and the consultation portal which are part of the Communications Team usual remit; and these will be presented to CMB and other key stakeholder groups as appropriate.</p>					
Oversight & Delivery of the Collaboration Framework Action Plan	Head of Communities, Equalities & Third Sector	75	31/03/21	12/02/20	31/03/21
<p><b>Comments:</b> 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 were 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 2020 meeting considering how the principles of the Collaboration Framework can be used to improve the accessibility of the city. The workshop was delayed. The meeting instead focused on developing a new inclusive taskforce and agreeing the areas of focus for the city's new inclusive city action plan - both required as a result of the council's decision to participate in the UK Inclusive Cities Programme (agreed at council's TECC committee September 2019). Taskforce and action plan to be restarted when inclusive cities programme restarts. Set by the external lead agency tbc.</p>					

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Programme to enhance the council's role to support the city economy and promote business	Executive Director Economy, Environment & Culture	95	31/03/20	14/02/17	31/03/20
<p><b>Comments:</b> The EEC directorate reports Major Projects updates to the Tourism, Development &amp; Culture Committee (<a href="https://present.brighton-hove.gov.uk/Published/C00000969/M00009191/AI00073061/\$TDCCMPTupdateMar19.docxA.ps.pdf">https://present.brighton-hove.gov.uk/Published/C00000969/M00009191/AI00073061/\$TDCCMPTupdateMar19.docxA.ps.pdf</a>)</p> <p>Corporate Modernisation 'Supporting Business' programme established.</p> <p>The Supporting Business Modernisation programme has the following workstreams:</p> <ul style="list-style-type: none"> <li>- Developing the business case for the refurbishment of Brighton Town Hall along the 'City Hall for Business Model'.</li> <li>- Improving the delivery of joined up transactional council services to businesses through Digital First</li> <li>- Establishing a pool of Business Ambassadors who can support the city with business leadership to develop the city's Inward Investment, Trade &amp; Export Strategy</li> <li>- Redesigning the City Council's Economic Development and International functions to align them to the changing needs of the city economy.,</li> <li>-- Digital First discovery work and business process review - Q3 2017/18.</li> <li>- Greater Brighton Trade, Export and Investment Strategy agreed by Greater Brighton Economic Board July 2018</li> <li>- A new Economic Strategy for the City agreed by Full Council December 2018. <a href="https://www.brighton-hove.gov.uk/content/business-and-trade/support-businesses/brighton-hove-economic-strategy-2018-2023">https://www.brighton-hove.gov.uk/content/business-and-trade/support-businesses/brighton-hove-economic-strategy-2018-2023</a></li> <li>- Business Survey Spring 2019</li> <li>- Economic Strategy approved by Full Council January 2019</li> <li>- New Visitor Economy Strategy approved, January 2019</li> <li>- 5 -year strategic Priorities for Greater Brighton Economic Board approved April 2019</li> </ul> <p>Next Steps</p> <ul style="list-style-type: none"> <li>- New Circular Economy Framework developed with an initial focus upon the build environment and visitor Economy - Jan 2020</li> <li>- Delivery of new Visitor Economy Strategy, including destination management plan 2019-onwards</li> <li>- Appointment of Business Ambassadors Spring 2019.</li> </ul>					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR32	Challenges to ensure health & safety measures lead to personal injury, prosecution, financial losses and reputational damage	Head of Human Resources & Organisational Development Head of Health and Safety Compliance and Transformation Manager	BHCC Strategic Risk	13/05/20	Threat	Treat	 L4 x 14	 L3 x 14		Revised: Adequate

#### Causes

Link to Corporate Plan 2020-23: Attributes 7. 'How will the plan be delivered' actions to achieve 'A well run council'.

To ensure that the council meets the requirements of law and controls the likelihood and impact of risks which have potential to cause harm to residents, visitors and stakeholders there must be robust oversight of arrangements in delivering services and procuring goods to meet health and safety (H&S) legislation and other regulatory requirements. This includes responding to the global COVID-19 pandemic to ensure the safety and health of our staff and residents of the City. This is challenged by reducing resources, increasing demands and changes to our operating environment, and increased focus by regulators.

#### Potential Consequence(s)

- \* Actual and potential harm
- \* Ability to respond to COVID-19 involves new skills and increased pace of response
- \* Custodial sentences for duty holders
- \* Fines and litigation
- \* Resources not well directed with implications for efficiency
- \* Decisions made are challenged
- \* Increased costs of rectifying mistakes
- \* Financial stability of organisation compromised
- \* Reputational damage.

#### Existing Controls

First Line of Defence: Management Controls



1. Health & Safety (H&S) policy which sets out roles, responsibilities and arrangements
2. Access to competent advice (Health & Safety team) including technical fire safety and lead investigation of all health & Safety incidents
3. Safety management framework - Team Safety. Link to HR processes e.g. working time directive returns triggering risk assessment for the individual
4. Active re-alignment of corporate H&S team expertise to support high priorities identified e.g. staff support to Housing and City Environment Management (CEM)
5. H&S Training core programme (online learning and face to face where essential)
6. Fire Risk Assessments (FRAs) in place on council buildings with a programme of review which is monitored by Head of Health and Safety and AD Property and Design
7. Wellbeing Steering Group managed by Health & Safety team - stronger links to staff issues, e.g. anxiety and isolation resulting from changes COVID-19
8. Housing Fire Health and Safety Board (Council, ESFRS) continue to oversee co-ordination of resources and manage actions through to completion. Ongoing monitoring of outcome of Grenfell Enquiry and implications for the council including housing stock. The enforcing authority are supportive of the council's approach and have developed a joint partnership approach to assessing and managing fire risk.
9. The Economy, Environment and Culture health & safety board oversees co-ordination of resources to manage risk and emerging safety issues
10. An Assurance Group has been formed and actions planned (the Strategic Corporate Action plan for H&S) but COVID-19 response has diverted resources and focus. See solutions below for planned actions.

#### Second Line of Defence - Corporate Oversight

1. COVID-19 Regular meetings: COVID-19 Response Group; specific work cells that the Response Group oversees (e.g. PPE Cell, Vulnerable People Cell etc); and Consultative Meetings with Unions (separate School Union meeting) take place weekly. Note these from April 2020 replace the Corporate H&S Committee.
2. Corporate H&S Team assess assurance levels for 'general' H&S based on H&S Checklists linked to Team Safety plans, and are developing an assurance process for COVID-19 Secure compliance.
3. H&S audit programme has been paused because of COVID-19 and will be re-assessed as part of the wider COVID-19 Secure assurance work.
4. Housing, Fire, Health & Safety Board meets regularly includes representation from East Sussex Fire & Rescue Service, the council's health & safety, Communications and Building Control and housing managers
5. H&S representation at Safety Advisory Group/Major Incident Support Team (MIST)
6. Community initiatives partnership, governance and escalation through Members' existing governance structures

#### Third Line of Defence: Independent Assurance

- a) Post Grenfell tragedy (June 2017) information required by Ministry of Housing Communities and Local Government (MHCLG) in relation to council owned blocks was provided.
- b) East Sussex Fire & Rescue Service (ESFRS) Regulatory Reform (Fire Safety) Order - ESFRS undertake citywide audits according to a prioritised programme which includes a range of council buildings. No inspections of council buildings have led to the need for enforcement action. All Council high rise buildings have been visited by ESFRS.
- c) Council reported to Ministry of Housing Communities & Local Government (MHCLG) on private sector blocks visual inspections.
- d) A Notice of Contravention issued by the HSE in response to their investigation into the fatality in a school Feb 2019 outlined necessary action. The

council have responded to the NOC and no further comment has been provided by the HSE.

e) HSE Control of Vibration unannounced inspection in City Parks in October 2017, linked to national focus on work related health. Areas for improvement identified which has led to development of an action plan with assigned leads and timescales for action. In March 2018 through an HSE visit specifically on vibration due to RIDDOR reports in City Parks and City Clean. Improvements were made.

f) After Inquest re. fatality of a council employee in 2018 the BHCC Coroner issued a Regulation 28: Report to Prevent Future Deaths in March 2019. Head of Health & Safety and Senior Lawyer prepared a letter in response to outline the activity of the council to address the issues raised within the Regulation 28 Report, and our plans to address the long term corporate issues. The letter was sent via the CEO of BHCC on 3 May 2019.

g) February 2019 ongoing investigation by HSE and HSE decision on prosecution is still pending as at 22/05/20.

There was no internal audit work in 2019/20.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Develop Wellbeing Strategy informed by the bi-annual 'Well Workforce Survey'.	Head of Health and Safety	40	31/03/22	01/04/19	31/03/22
<b>Comments:</b> Well Workforce Survey launched by Public Health in liaison with the Wellbeing Steering Group Feb 20. Data analysed by Public Health shared with Wellbeing Steering Group., however response to COVID-19 has taken precedence and we will use the experience to inform the new strategy. There will be consultation with staff forums and the Unions and shared with staff and partners.					
Engagement of independent health & safety consultancy RoSPA to undertake a review of our corporate H&S arrangements	Head of Human Resources & Organisational Development	40	01/01/21	01/06/19	01/01/21
<b>Comments:</b> The audit was scoped and agreed with RoSPA (Royal Society for the Prevention of Accidents) and scheduled for February 2020. However due to COVID-19 did not take place. Discussions underway to re-establish the focus and viability of the audit given the current COVID-19 priority work with consideration of whether the audit could now include COVID-19 Secure assurance.					
Ensure H&S implications are in the corporate response framework for COVID-19	Head of Human Resources & Organisational Development	25	31/03/22	07/02/20	31/03/22

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<b>Comments:</b> Active representation in all corporate COVID-19 cells that have a H&S implications; ongoing reporting through the COVID-19 meetings; proactive monitoring of ongoing changes to global, national and local COVID-19 status and the resultant guidance to follow.					
Housing Fire Safety Board plan and monitor the ongoing programme of sprinkler installations in the council's housing stock as approved by Housing Committee	Assistant Director Housing	50	31/03/21	01/04/16	31/03/21
<b>Comments:</b> Continue to work with ESFRS to take a risk based approach to prioritising consultation with residents on installation of sprinkler systems in council blocks, utilising match-funding where available. Continue joint monitoring of statutory fire risk assessment and other duties and a risk based approach to investment and response to issues arising, including fire doors in council blocks. Ensure emerging Fire Health & Safety Standards from central government post Grenfell are reviewed and implemented as required. In particular, concerning issues with fire doors. Continue to update H&NH Cttee.					
Re-assess Team requirements to deliver an effective H&S service to manage this risk (both core and COVID-19 risks)	Head of Human Resources & Organisational Development	0	01/09/20	22/05/20	01/09/20
<b>Comments:</b> After scoping COVID-19 assurance activity methods and requirements, assess Team capacity to deliver and report to ELT.					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR33	<b>Not providing adequate accommodation and support for people with significant and complex needs</b>	Executive Director Health and Adult Social Care Head of Adult Social Care Commissioning Assistant Director Resources, Safeguarding and Performance	BHCC Strategic Risk	13/05/20	Threat	Treat	 L4 x 14	 L3 x 14		Revised: Adequate

#### Causes

Link to Corporate Plan 2020-23. Outcome 6 'A Healthy and Caring City', action 6.2 'support people to live independently'.

Unclear needs assessment for clients in this group and likely demand

Cross planning across organisations and services is complex

Services are not able to cope with demand

Lack of affordable accommodation within the city and housing benefit changes

#### Potential Consequence(s)

People are placed in inappropriate accommodation which may present a danger or risk to them or others

People may not get the appropriate services and support to address their needs

Placing people in unsuitable accommodation for their needs

Failure to review ongoing needs of individuals and their family once initially housed

Clients are not supported appropriately

Public services deal with the effect, e.g. hospital admissions, anti-social behaviour, self-harm

Increased financial pressures are ongoing, especially considering the context of post Covid-19

Outcomes for services and clients are not achieved

#### Existing Controls

## First Line of Defence - Management Controls

### Housing Strategy.

Rough Sleeping and Homelessness Strategies are combined into a single plan as approved at Full Council in December 2019

Greater cross-directorate recognition of pressures and delivery issues between housing and adult social care led by Executive Directors (EDs) and senior officers.

Rough sleeping and single homeless persons services are commissioned and will be reviewed as an ongoing process.

Five year plans prepared for agreement at Strategic Accommodation Board (SAB) when business as usual continues post Covid-19.

The Health and Wellbeing Strategy is delivering the Joint Strategic Needs Assessment on people with multiple and complex needs as part of its Living ; Ageing Well Workstreams.

## Second Line of Defence - Corporate Oversight

1. Strategic Accommodation Board is a cross-council group, meeting bi-monthly, chaired by ED HASC and is formed of ED Housing, Neighbourhood and Communities (HCN), senior directorate representatives to supplement housing strategy and enable focus on vulnerable adults and children. Strategic action plan now being developed focussing upon available council sites and Clinical Commissioning Group (CCG) also attend as co-strategic partner.

2. Rough Sleeping Strategy Board, cross organisational meets quarterly, chaired by Head of Policy & Partnerships on behalf of City Management Board.

3. Safeguarding Adults Partnership Board (SAPB) learning from current cases escalated by officers or others e.g. the Local Government & Social Care Ombudsman (LGSCO).

4. Health & Wellbeing Board; Housing Committee.

## Third Line of Defence - Independent Assurance

1. Independently chaired Local Safeguarding Adults Board meets quarterly and provides an annual report to the Health & Wellbeing Board.



2. Independently chaired Local Safeguarding Children Board meets quarterly and provides an annual report to the Health & Wellbeing Board.

3. Internal Audit - This is risk was agreed March 2018. No specific Internal Audit work.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Develop and roll out communication with Tier 4 managers to be aware of role of the Local Safeguarding Adults Board (LSAB) to improve escalation cases and referrals for Safeguarding Adults Reviews	Assistant Director Resources, Safeguarding and Performance	15	31/03/21	12/07/18	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<b>Comments:</b> This work has been agreed by ED HASC and has been raised at LSAB Dec 2019. Agreed for Pan Sussex Escalation Protocol to be written, to be used for relevant cases. LSAB Sussex Policy and Procedure (P&P) Sub Group are taking this forward, timescales to be agreed at P&P Sub Group Jan 2020. Process will include communications with staff and Safeguarding Adult Review referral pathway guidance.					
Ensure our overall customer service is compliant with Homeless Code of Guidance and our Housing Allocations Policy, including close working with Adult Social Care and / or Children, Families & Schools so we have a holistic view of the overall household needs and any ASC / CFS accommodation or other duties that may apply	Assistant Director Housing	60	31/03/20	01/08/19	31/03/20
<b>Comments:</b> We are compliant with the homeless code of Guidance. Separately we are looking at how we improve customer service and are planning a service transformation in this respect, incorporating the principles of a psychologically improved environment. This will be in place by early 2020. With regard to the Allocation Policy, and more pertinently the Allocation Plan, this is aligned with ASC and Children Family and Schools to help meet housing needs across the council. We are also working cross directorate to obtain a holistic view of a households needs.					
Ensure our timely provision of appropriate Temporary Accommodation via Housing, within our commissioning of any specialist accommodation whereby we have a joint discussion on city housing needs and accommodation requirements for specialist housing groups via Strategic Accommodation Board	Assistant Director Housing	100	31/03/20	01/08/19	31/03/20
<b>Comments:</b> We are about to re-procure Temporary Accommodation and have included feedback from ASC in developing the specification. In addition specialist accommodation requirements are happening via the Strategic Accommodation Board .					

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Needs Assessment using Public Health data and other intelligence to inform adult social care commissioning - demands analysed, resource availability and reported to Strategic Board and communicated to provider market and partners to develop capacity	Head of Adult Social Care Commissioning	50	31/03/21	01/02/18	31/03/21
<p><b>Comments:</b> May 20 update - This work continues and will be reviewed in the light of Covid-19.</p> <p>Oct 19 update - We have developed a Commissioning Strategy to identify the priority areas to ensure we have the right services to meet needs. The Community Strategy has informed the development of the Market position statement as reported to HWB.</p> <p>January 19 Update - Some analysis provided to Strategic Accommodation Board, e.g. implementation agreed Learning Disability accommodation review undertaken and reported to Health &amp; Wellbeing Board on 6/3/18. The HASC Directorate Plan contains action on the Market Position Statement as a priority. The Market Position Statement will be reported to Health &amp; Wellbeing Board in Q4 2019.</p> <p>An older peoples accommodation needs assessment has also been commissioned through Housing Lin and this will report in by End of August 2019. This will be valuable to support both commissioning and planning/development opportunities that might arise or be proposed.</p>					
Service Review of inhouse hostel provision now links to the Supported Accommodation review to develop improvements and meet future needs	Assistant Director Resources, Safeguarding and Performance	30	30/09/20	01/04/19	30/09/20
<p><b>Comments:</b> May 20 update: Work is in progress and will be monitored in the context of post Covid-19</p> <p>Oct 19 - Homeless Link commissioned to carry out review with report to be made to lead Members at end Nov 19.</p> <p>June 19 - The scoping of this review is underway, working with the CCG and relevant partners. Progress reports will be reported to SteerCo- Sustainable Social Care; and the Accident &amp; Emergency Delivery Board.</p> <p>Organisation has now been commissioned (Homeless Link) and kick start of meeting planning for end of July 2019.</p>					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR34	<b>Ambitions to improve offer for staff which have been stated in Our People Promise may not be realised</b>	Head of Human Resources & Organisational Development	BHCC Strategic Risk	13/05/20	Threat	Treat	 L3 x I4	 L2 x I3		Revised: Adequate

#### Causes

Link to Corporate Plan 2020-23. Attribute 7 'Our Workforce', action 7.6.

Lack of consistent support and promotion to staff across the council's leadership and from support services; lack of engagement from trade unions and/or complex employee relations issues diverts resources to deliver Our People Promise..

#### Potential Consequence(s)

1. Lack of impact on staff wellbeing (as tracked by annual staff survey, due April 2019).
2. Quality of leadership across organisation.
3. Ability of city council to drive improved performance.
4. Impact on staff recruitment and retention.
5. Increased costs.
6. Failure to deliver creates lack of confidence and future support.

#### Existing Controls



First Line of Defence - Management Controls

1. Our People Promise programme board chaired by Head of Human Resources & Organisational Development.
2. Regular review meetings with Chief Executive and Exec Director, Finance & Resources.

Second Line of Defence - Corporate Oversight



1. Corporate Modernisation Delivery Board.
2. Regular review at Leadership Board and Leaders' Group
3. Policy & Resources Committee.

Third Line of Defence - Independent Assurance

None.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Monitor effectiveness of Our People Promise offer and consult with others to consider refining details	Head of Human Resources & Organisational Development	75	31/12/20	31/05/19	31/12/20

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> Modernisation funds secured to progress the work to develop and implement actions from Our People Promise for 19/20 and 20/21. The Leadership Development performance appraisal system continues to be embedded, and the 360 mid-year appraisal process has been completed with reports issued to tier 1-4 leaders. All members of the leadership network have been through a rated appraisal process, and moderation of the results took place between September and December. The leadership development programme is underway with 3 mandatory elements being rolled out: 'Inspirational communications', 'holding challenging conversations' and 'working with members'. Feedback from these modules has been excellent. The wellbeing work stream has been reviewed and work around mental health and physical activity has been prioritised. The next wellbeing survey will run in January 2020, and the outcome of this will be used to shape the next steps for the wellbeing agenda. The sickness procedure was approved at P&amp;R on 10th October, and an implementation plan is now underway which will include training for managers. The new attendance and wellbeing team in HR has been established and is working to target activity according to FirstCare attendance data, and in response to the increase in sickness in certain areas of the council. This increase has been caused largely by an increase in absence attributable to stress and mental health in certain parts of the Council.</p> <p>The Action plan for the Fair and Inclusive work is underway, and was approved at P&amp;R on 10th October. Collaboration with TU's and workers forums continues to co-create the plan to improve the organisations management of equality and diversity. Agreement has been reached to offer 2.5 days release for the co-ordinator of the BMEWF to support the progression of the work within the plan, and provide time to ensure the necessary engagement with the forum. This release started in January 2020.</p> <p>Action plans for the staff survey have been developed within services, and the corporate action plan has been approved by ELT.</p> <p>P&amp;R approved on 10th October 2020 a series of proposals to improve our reward offer to staff. These include an annual leave purchase scheme, rental loans scheme, pension awareness session, shared cost Additional Voluntary Contributions and pay protection for medical redeployees. Implementation of these proposals is underway.</p> <p>All of the above further improve the employment offer, and support increased morale and motivation, as well as supporting.</p> <p>Next steps:</p> <ol style="list-style-type: none"> <li>1. Further target support for wellbeing in response to detailed analysis of sickness data, and the outcome of the well workforce survey (HR Lead Consultant , March 2019)</li> <li>2. Launch 'we need to talk about race campaign' (Internal communication manager, January 2019).</li> <li>3. Implementation of the reward changes (Lead Consultant, Reward, Policy and Projects Team March 2020).</li> </ol> <p>Measures of success:</p> <p>Deliver specified and non-cashable benefits for the project/programme (March 2020).</p> <p>10 % improvement in staff survey results against 'I feel valued by my employer' question (Staff Survey – May 2019).</p> <p>10% improvement in equality data regarding representation of staff with a protected characteristic.</p>					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR35	Unable to manage serious risks and opportunities resulting from the impact of Brexit on the local and regional society and economy.	Executive Lead Officer Strategy, Governance and Law Brexit Coordinator	BHCC Strategic Risk	13/05/20	Threat	Treat	 L5 x I4	 L4 x I3		Revised: Uncertain

#### Causes

Link to Corporate Plan 2020-23. Outcome 2 'A city working for all'.

The timescale and final details of the Brexit implementation is uncertain and is affected by the Covid-19 pandemic with an increased risk that negotiations will not progress sufficiently to avoid a No Deal Brexit. The potential impacts include:

1. Economic impact of Covid-19 affecting businesses, citizen wealth and council income
2. Existing rights and regulations applying to EU citizens residing in the UK pre- Brexit
3. The ability of partners in the health & social care sector to engage and retain staff
4. Local projects unable to secure future EU funding after Brexit
5. Travel and hospitality businesses' ability to recruit or employ foreign nationals
6. Pool of workers reducing (B&H has a larger pool of European residents)
7. Travel in and out of Greater Brighton due to changed border controls

#### Potential Consequence(s)

1. Fragmented communities leading to civil unrest
2. Increased demand for advice services for EU residents, citizens & businesses
3. Reduced city wealth
4. Reduction in workforce, skills and capacity affecting health and social care in the city
5. Disruption to supply chains - food, fuel, medical supplies and other key components of city infrastructure
6. Less able to manage local environmental impacts e.g. waste disposal
7. Less certainty around export/import regulations
8. Impact on food safety regulations and standards inc. Export Health Certificates

## Existing Controls

### First Line of Defence - Management Actions

1. Officer Brexit Resilience & Planning Group (BRPG) chaired by ELO SGL to monitor developments and co-ordinate proposals for corporate response. Core Group meeting schedule kept under review and informed by national planning assumptions & SitRep reports going to ELT and all Members and discussed at DMTs.
2. Co-ordinated recovery programme to support the city to recover from the Covid-19 pandemic as reported to Policy & Resources (P&R) Committee 30th April 2020.
3. Key areas of potential impact highlighted in SitRep and monitored by BRPG with necessary mitigating activity clearly outlined. Summary provided through Readiness Report available on council website (<https://new.brighton-hove.gov.uk/sites/default/files/news/brexit/brexit-readiness-report-october-2019.pdf>)
4. Brexit Member Working Group providing Member oversight of the potential impacts of Brexit on Brighton & Hove and coordinating relations with city stakeholders and communities where potential impact has been identified by the Brexit Resilience & Planning Group.
5. City Management Board (CMB) city resilience planning as part of their city leadership role.
6. Established contact on potential Brexit impacts with our waste contractor Veolia, inc. on post-Brexit and future waste disposal arrangements including reselling of recycled materials
7. Communications are open within council and with city partners to escalate, disseminate and develop solutions to emerging issues through the Brexit Coordinator and the BHCC Communications Team.
8. BHCC Corporate Procurement Team aware of new UK portal for issuing OJEU notices and other matters.
9. BHCC monitoring developments on employment rules and laws.
10. BHCC leading on the Sussex wide supply chain and logistics cell/workstream on behalf of the Sussex Resilience Forum.
11. FCL and HASC monitoring potential impacts on service delivery e.g HM Govt's mutual recognition of social work qualification in relation to service delivery and immigration issues for workforce and service users.

### Second Line of Defence – Corporate Oversight

1. ELT role as strategic lead for Brexit response through monthly overview of BRPG actions.
2. P&R Recovery sub-committee overseeing Brexit in the context of resilience and recovery as a result of Covid-19 pandemic.
2. BHCC is part of the Sussex Resilience Forum (SRF). The SRF is working with colleagues both regionally and nationally to review contingency plans and ensure the county is prepared for possible Brexit impacts.
3. BHCC Director of Public Health is the co-Chair of the Local Health Resilience Partnership and attends meetings and NHS preparedness exercises.

### Third Line of Defence – Independent Assurance

BHCC completes a range of HM Government surveys and returns. At this stage there is no view communicated by HM Government on BHCC actions but post-Brexit assessment from Home Office of BHCC actions may occur.

Reason for Uncertain rating in Effectiveness of Controls - there is still uncertainty and the risk actions are in development.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
All council services to ensure that Business Continuity Plans consider potential impacts on contracts and supply chain issues related to a Brexit 'no deal' scenario.	Environmental Health Manager	50	30/09/20	06/02/19	30/09/20
<b>Comments:</b> Housing Neighbourhood & Communities (HNC) directorate's Emergency Planning and Resilience (EPR) team are part of BRPG. ELT instruction to ensure all their BC arrangements are considered in line with SitRep report. Senior officers risk and resilience training part 1 has been delivered. BCPs reviewed in the context of Brexit.					
All directorates to ensure providers messaged to request reviewing of Business Continuity Plans in relation to a 'no deal' Brexit scenario.	Executive Lead Officer Strategy, Governance and Law	60	30/09/20	25/09/19	30/09/20
<b>Comments:</b> Audit trail of messaging to providers requested by Policy, Partnerships & Scrutiny (PPS) team for corporate coordination to provide evidence and offer guidance to assist those with any issues. Further assistance required from Procurement to ensure effective coverage across all council services.					
Awareness raising of EU Settlement Scheme (EUSS) and available support across the city for residents, businesses and partners.	Head of Communications	75	31/03/21	06/02/19	31/03/21
<b>Comments:</b> We've had over 18.5k applications and our estimated EU population was 19k so on paper we're on track for keeping our valued EU residents. However, the 19k was a best guess and we are aware of further work need to ensure as many people as possible are reached and apply.					
BHCC to maintain ongoing liaison with Shoreham Port through SRF planning arrangements.	Environmental Health Manager	60	30/09/20	06/02/19	30/09/20

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<b>Comments:</b> EEC & NCH responsibility being covered by 2 officers, the AD City Transport and the Regulatory Services Manager. Shoreham Port risk assessment moved to Green Oct 2019. Ongoing engagement and monitoring continues.					
Brexit Resilience & Planning Group (BRPG) to make recommendations for ELT agreement for the prioritisation of Govt funding related to Brexit impact mitigation activities including specific communications needs and staffing resources.	Head of Policy, Partnerships & Scrutiny	75	31/03/21	25/01/19	31/03/21
<b>Comments:</b> Brexit Coordinator appointed Sept 2019 (part of PPS team) Brexit Communications Officer appointed Nov 2019 (part of Communications team) 4 x EU Settlement Scheme (EUSS) scanning devices purchased. In use at Brighton Town Hall as part of free ID checking service for the EUSS scheme for residents. Emergency Planning College/Cabinet Office risk & resilience training for senior officers - 2 sessions delivered - a follow up session took place in Jan 2020. Transition year until Dec 2020 staffing retained and further planning underway.					
Cross-party Member Working Group maintaining oversight of the potential impacts of Brexit on Brighton & Hove and co-ordinate relations with city stakeholders and communities where potential impact has been identified by the Brexit Resilience & Planning Group.	Executive Lead Officer Strategy, Governance and Law	65	30/09/20	30/09/19	30/09/20
<b>Comments:</b> Scheduling of meetings influenced by national planning assumptions. Previously taking place fortnightly and will be reviewed after 2019 General Election. Group provides direction to the BRPG through agreement of actions and financial sign-off.					

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Health & Social Care services provide contact point for providers if they have Brexit issues related to following the CQC guidance provided to providers.	Head of Adult Social Care Commissioning	60	30/09/20	25/09/19	30/09/20
<b>Comments:</b> Health and Social Care services are focused on work to respond to the Covid-19 pandemic. In respect of Brexit Emails were sent to all providers outlining areas of potential impact for them to consider in their Business Continuity Plans and signposting to additional Gov.uk guidance and support. The health care services continue to monitor progress and uptake and signpost further as necessary.					
Readiness Monitoring Report updated on regular basis through 2020.	Brexit Coordinator	30	30/09/20	01/02/19	30/09/20
<b>Comments:</b> The impact of Covid-19 has been that to refocus work on managing the Covid-19 response and the intensity of Brexit work has to some extent been paused. The Brexit Coordinator continues to collate and share emerging issues and risks and previous meetings of MWG & BRPG are paused but can be reinstated at the end of the Transition Period or depending on national planning assumptions					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR36	<b>Not taking all actions required to address climate and ecological change, and making our city carbon neutral by 2030</b>	Executive Director Economy, Environment & Culture Business Development Manager - Transport International & Sustainability Programme Manager	BHCC Strategic Risk	13/05/20	Threat	Treat	<div>Red</div> <div>L5 x I4</div>	<div>Red</div> <div>L4 x I4</div>		Revised: Uncertain

#### Causes

Link to Corporate Plan 2020-23. Outcome 5 'A sustainable City', action 5.1 'Become a carbon neutral city by 2030.'

The climate is warming and studies recommend that actions must be taken to keep global warming to under 1.5 degrees to avoid negative catastrophic impacts on biodiversity and the ecology of the planet.

#### Potential Consequence(s)

If this is not addressed local impacts are:

Sea-level rise impacting Brighton & Hove as a coastal city

Coastal protections challenged by sea level rise affecting city roads, homes and the coastline

Increasing local flooding due to extreme weather events and prolonged periods of heavy rainfall, inefficiencies in our urban infrastructure and built environment

Water shortage

Crop failure and food insecurity

Depletion or threat to local species and their natural habitats

Ocean acidification

Impact on public health due to increased temperatures

#### Existing Controls



### First Line of Defence - Management Actions

1. Brighton & Hove is part of the UNESCO biosphere designated area with biodiversity plan overseen by the biosphere delivery board who meet 3 times p.a. As at January 2020 the delivery board is chaired by Martin Harris CEO of Brighton & Hove buses, the deputy chair is Sean Ashworth of Inshore Fisheries Conservation Authority (IFCA).
2. BHCC, the Brighton & Hove Economic Partnership and the Chamber of Commerce have agreed an economic strategy which includes creating a sustainable city and moving towards a circular economy as a core objective
3. BHCC owns 12,000 acres of downland and agricultural farmland surrounding the city and works in partnership with Southern Water and the South Downs National Park Authority on initiatives to protect the chalk aquifer and city water supply
5. BHCC and the Transport Partnership work together to deliver sustainable transport policies through the delivery of the Local Transport Plan (LTP)
6. Flood and Coastal Erosion risk management - Brighton Marina to River Adur coastal protection scheme undertaken in partnership with the Environment Agency (EA), BHCC, Adur District Council, Shoreham Port Authority.

### Second Line of Defence - Corporate Oversight

1. BHCC's Environment, Transport & Sustainability (ETS) Committee is responsible for the council's functions in relation to coastal protection and flood defence; sustainability; parks; open spaces; sustainable transport; highways management and environmental health
2. Biosphere delivery board oversees delivery of biosphere management strategy
3. BHCC's Policy & Resources (PR) Committee approved the 2030 Carbon Neutral programme in Dec 19 and a Member working group to develop a high level carbon neutral plan by June 2020
4. Air quality Programme Board
5. Greater Brighton Economic Board's Infrastructure Panel has oversight of Energy and water plans
6. Communications officer in post to support carbon neutral programme.

### Third Line of Defence - Independent Assurance

Environment Agency (EA) in respect of flooding and monthly reports made to EA on how the city council spends the monies received from EA includes schemes such as coastal protection; Property Level Protection; sustainable urban drainage SPG (policy); Strategic Flood Risk Assessment.

Reason for Uncertainty in Effectiveness of Controls - The EEC Directorate Plan has actions specified but there will also be new actions added as the Climate Change agenda issues are determined.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Create a new Climate change fund	Assistant Director - City Development & Regeneration	50	31/03/20	24/06/19	31/03/20

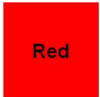

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<b>Comments:</b> First call for SCRIF funding has gone out, bids due in on 18/10/19. Members Oversight Group met on 27/11/19 to review the bids, first project approval made in January 2020.					
Develop a local cycling and walking infrastructure plan (LCWIP)	Assistant Director City Transport	30	31/12/20	21/05/19	31/12/20
<b>Comments:</b> The LCWIP project is underway, with technical support being provided since late March 2020 by consultants Mott MacDonald following a competitive tender exercise. Mott MacDonald have worked on numerous LCWIPs in other cities / areas, and also provide technical support to Department for Transport (DfT) on the LCWIP programme nationally. Therefore we are well placed to learn lessons from these other areas / programmes when developing our LCWIP. Officers are currently reviewing the early stakeholder engagement planned, in light of Covid-19 restrictions.					
Develop a new sustainable transport strategy (LTP5) for the city	Assistant Director City Transport	25	31/10/21	21/05/19	31/10/21
<b>Comments:</b> Consultants are currently undertaking a review of appropriate transport and travel policy measures for the city, drawing on national and international best practice. Following an assessment of a long-list of measures, the recommended short-list will be presented in June. The current forward working programme consists of a three staged approach to preparing LTP5 as follows: 1. Initial transport and travel conversation to include: a) motivations for switching to active travel; b) feedback on proposed key outcomes/objectives and approach/principles; and, c) suggestions on how streetspace should be prioritised. This is being developed alongside proposals for Climate Assembly engagement during the spring/summer, supplemented by stakeholder workshops. Completion: Summer 2020 2. Preparation of a summary transport strategy document, drawing on the outcome of further measures optioneering, for the Climate Assembly and wider consultation. Completion: Autumn 2020 for consultation 3. Preparation of LTP5 documents including SEA and impact assessments for (formal) consultation. The content will be informed by inputs from councillors, the Climate Assembly and consultation part 1. Completion: Spring 2021 for consultation					

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Develop a route map towards a Circular Economy	Assistant Director - City Development & Regeneration	25	31/03/20	21/05/19	31/03/20
<b>Comments:</b> Initial events on Built Environment & Construction and Visitor Economy held in June/July 2019. Accelerator Sessions focusing on the Built Environment and Construction to support staff engagement have been held since September 2019 and will continue until February 2020. These are supporting identification of actions, policy and case studies for supporting implementation of circular principles across council services and operations. Environmental consultancy SOENECS have been commissioned to write the CE framework. Work on progressing with the Visitor Economy will commence shortly.					
Develop a whole Downland Estate plan	Assistant Director - Property & Design	25	31/03/21	21/05/19	31/03/21
<b>Comments:</b> CDEP consultation paused as a result of COVID19, this has given the team the opportunity to plan the consultation/ engagement stage thoroughly, seek project support and explore Planning for Real techniques. Previous update - Presentation to EEC Modernisation Board and further detailed presentation to Ex Dir from Savills regarding strategy, aims and process Workshops with stakeholders are currently taking place to inform the audit of assets and natural capital themes. Rural portfolio presentation to Asset Member Board (AMB) in October 19 to include progress on the City Downland Estate Plan. Further presentations to AMB on City Downland Estate Plan in first quarter. Good engagement.					
Establish a 2030 Carbon Neutral City Programme to report to P&R Committee (involves work between the ED EEC; the Executive Lead Officer, SGL; and Head of Policy, Partnerships & Scrutiny)	Executive Director Economy, Environment & Culture	35	31/03/20	21/05/19	31/03/20

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> • 2030 Carbon Neutral Programme Initiation Document approved at P&amp;R committee in December 2019</p> <ul style="list-style-type: none"> <li>• Cross-party 2030 Carbon Neutral Programme Board established with terms of reference agreed by P&amp;R Committee, December 2019.</li> <li>• Draft specification for the tendering for support to establish and deliver as deliberative engagement (Climate Assembly) process agreed by P&amp;R Committee, December 2019</li> <li>• Climate Assembly tender exercise took place December-January 2020</li> <li>• Review of current initiatives that currently tackle climate change developed, November 2019</li> <li>• Governance structure for officer steering group and project team established, October 2019</li> <li>• Collation of outline the baseline data and measuring tool, October 2019</li> <li>• Lead BHCC officer identified and working on Communications plus Digital communications support in place , November 2019</li> </ul>					
Establish a 2030 Carbon Neutral Programme and governance framework	Head of Policy, Partnerships & Scrutiny	20	31/05/21	10/10/19	31/05/21
<p><b>Comments:</b> This is a ten year programme ending 31 March 2030. The draft Programme Initiation Document was considered by Member steering group on 09 Oct 19. Member Working Group established and Climate Assembly agreed. The Climate Assembly was postponed due to Covid-19 but is due to take place on line in November 2020. The Net Zero Carbon Strategy is currently being developed, and is due for launch Spring 2021.</p>					
Improve rates of recycling and re-use and develop business case for food waste collection	Assistant Director - City Environmental Management	50	31/10/20	21/05/19	31/10/20

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> Between April 2019 and December 2019, 29.5% of waste was sent for reuse, recycling and composting. The percentage for the 2019/20 financial year is expected towards the end of June 2020.</p> <p>Actions:</p> <ul style="list-style-type: none"> <li>• Delivering the Managing Waste Responsibly Project (previously known as Increasing Recycling) to increase recycling rates</li> <li>• Completed the rollout of on-the-go recycling litter bins along the seafront</li> <li>• Introducing a third garden waste round</li> <li>• Sent a recycling leaflet out with council tax bills explaining what can and cannot be recycled</li> <li>• Received funds of £33,960 from the Sustainability &amp; Carbon Reduction Investment Fund to expand the Community Composting scheme</li> <li>• Completing a cost-benefit analysis for the introduction of a food waste service</li> <li>• Rolled out new design communal recycling bins to the Lewes Road Triangle, with different lids for different type of waste and improved signage</li> <li>• Designing the new communal bin system</li> </ul>					
Review Biosphere Management plan	Assistant Director - City Development & Regeneration	25	31/03/20	21/05/19	31/03/20
<p><b>Comments:</b> New Biosphere Programme Manager has started to review the existing management plan. The Biosphere Board held a workshop on principles and alignment with UN sustainable development goals at the last meeting.</p>					
Review procurement of fleet to deliver lower emissions & improve air quality	Assistant Director - City Environmental Management	40	31/10/20	21/05/19	31/10/20

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> Approval has been obtained for spending of c.£1million on immediate fleet replacement needs. £300k of this has been allocated, and directors will be asked to authorise spending on the remainder as soon as the exact vehicles required have been identified.</p> <p>At Environment, Transport &amp; Sustainability Committee on 26 November 2019, Members agreed a mixed and flexible approach to procurement, aiming for the maximum carbon reduction per pound.</p> <p>The new approach will ensure that the oldest, most costly and non-environmentally friendly vehicles are replaced as soon as possible and will enable a flexible approach to respond to advancing technologies.</p> <p>This approach is to be developed as part of a council-wide Fleet Strategy which will be taken to Members for final approval.</p> <p>A project is underway to hire and test electric vehicles to inform and de-risk our preferred option.</p>					
<p>Roll out a network of electric vehicle charging points (EVCP) - Directorate Plan ref. 4.38</p>	Assistant Director City Transport	60	31/08/20	21/05/19	31/08/20
<p><b>Comments:</b> The installation of over 200 lamp post chargers started in February, but was paused in March due to the impact of Covid-19. 102 charging points have been installed and are now live. These are 'slow chargers' allowing for overnight charging in areas of the city with no off-street parking. The signing and lining of 20 exclusive recharging bays has also been put on hold.</p> <p>The replacement of the existing public 'fast charger' network with new equipment (providing a full charge in 4-5hours) has also been postponed until government restrictions related to Covid-19 are lifted.</p> <p>Quotes have been received for powering a range of sites close to the 4 proposed rapid taxi charging hubs (with 6 rapid charging bays per hub) as identified following consultation with the taxi trade in 2019. The rapid chargers can provide a full charge within 30 minutes but installation has been postponed due to the impact of Covid-19. After the specific bay locations have been agreed, local residents will be notified, and some bays at each hub will be made available for public use until such time as they are needed by electric taxis.</p> <p>The Council has withdrawn from the Horizon 2020 project (demonstrating a portable EV charging solution for events and a booking system for EV bays) due to liability issues in the collaboration agreement which were unresolvable.</p>					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR37	Not effectively responding to COVID-19 in Brighton and Hove	Executive Director Health and Adult Social Care Programme Manager - PMO	BHCC Strategic Risk	13/05/20	Threat	Treat	 Red L4 x I4	 Amber L3 x I4		Revised: Uncertain

#### Causes

Link to Corporate Plan 2020-23. Outcome 6 'A healthy and caring city', action 5.1 'Increase healthy life expectancy and reduce health inequalities'  
 The pandemic of COVID-19 represents unexperienced challenges to the city and the council's ability to work with its partners and others to deliver services including statutory and support service users, residents, businesses and employees of the council

#### Potential Consequence(s)

1. Increases in numbers suffering physical and mental illness; and deaths
2. compromised ability to deliver statutory duties and business as usual
3. not delivering safe services and meet needs
4. trust and confidence and reputation of the council affected
5. damage to city economy and the wealth of citizens
6. capacity of staff, providers and contractors tested
7. health and wellbeing impact on those delivering services
8. emergency operating arrangements increase budget overspend
9. sustainability of local tax base affects council's financial position to deliver Corporate Plan

#### Existing Controls

#### First Line of Defence: Management Action

1. Covid-19 Response programme developed with clear governance which includes member input
2. Covid-19 Response Group (CRG) meetings at least weekly with relevant officers, Health and other city partners, Council Members and the Community & Voluntary sector
3. Activity delivered through thematic 'Cells' of officers and partners to mitigate risks
4. City Council's links with Local Resilience Forum (LRF), Public Health England and National Health England to address response to COVID-19
5. Regular communications on the council's website and intranet and press releases
6. Emergency Resilience Team connected with work with neighbouring local authorities and blue-light services
7. Corporate Covid-19 Risk Register and Directorate Level Covid-19 risk register are managed and reported regularly

#### Second Line of Defence: Corporate Oversight

1. CRG report at least weekly to the Executive Leadership Team (ELT)
2. Twice daily ELT discussions on Covid-19 position
3. Reports to the Policy Chairs' Board and relevant Committees e.g. Policy & Resources Committee on financial implications for Council as a result of Covid-19 on 4th April 2020

#### Third Line of Defence – Independent Assurance



1. None to date

Reason for Uncertainty of Effectiveness of Controls is that this is an unprecedented global incident.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Develop and deliver Covid-19 response programme	Programme Manager - PMO	50	31/03/21	20/03/20	31/03/21
<b>Comments:</b> Covid-19 response programme developed. Governance arrangements agreed with Executive Leadership Group and the Leader/Deputy Leader of the council. 'Cell's developed to work on specific areas of work – project management and communications support assigned to each cell. Regular progress update arrangements from 'Cells' being reported to the Covid Response Group and to the ELT oversight group. Risk management at the corporate and directorate level in place.					
Establish & maintain effective links at national and regional level to ensure a coherent response	Programme Manager - PMO	50	31/03/21	10/02/20	31/03/21



Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p><b>Comments:</b> BHCC represented on the Incident Strategic Co-ordinating Group and Incident tactical co-ordinating group to ensure co-ordination across the region.</p>					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR38	<b>Difficulty in restoring trust and confidence in the home to school transport service and sourcing sufficient capacity to resolve issues raised by the independent review.</b>	Acting Executive Families, Children & Learning Service Manager - Directorate Policy & Business Support Assistant Director Education & Skills	BHCC Strategic Risk	13/05/20	Threat	Treat	 L4 x I4	 L3 x I4		Revised: Adequate

#### Causes

Link to Corporate Plan 2020-23. Outcome 4 'A growing and learning city', action 4.3 'Ensure that no child or family is left behind'

Changes to transport contract arrangements for Home to School Transport (HTST) in the summer of 2019 led to a range of operational difficulties at the start of the autumn term 2019. Although many of those issues were resolved within a few weeks, , there are some significant residual problems with contractual compliance, with associated risks to the safety and wellbeing of children and the reputation of the council. The response to the recommendations from the independent review into HTST requires additional capacity, not only from the HTST team, but from a range of corporate central services (commissioning, procurement, finance, legal, Health and Safety, Learning Development, Customer Service etc.

#### Potential Consequence(s)

1. compromised pupil safety
2. parental trust and confidence not repaired
3. reputational damage to council
4. recommendations from independent review not actioned
5. strain on capacity and increased levels of stress for staff
6. emergency arrangements increase budget overspend

#### Existing Controls

First Line of Defence: Management Action

1. Compliance checks currently being undertaken with all contractors and updated on council records
2. Increased spot checks in person being undertaken on key routes
3. Temporary increase in capacity of team to resolve issues
4. Additional temporary leadership capacity to tackle strategic issues going forward
5. Co-production on all new plans and policy with Parent and Carer Council (PACC)/Amaze which is local charity which supports parents of children with SEND

Second Line of Defence: Corporate Oversight

1. Member Policy Panel holding a series of public meetings ahead of reporting back to CYPS committee later in 2020.
2. Additional resources agreed at Policy & Resources Committee, June 2020 to enhance service delivery

Third Line of Defence: Independent Assurance

1. January 2020 external HTST review with recommendations co-ordinated by the Local Government Association.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Review service structure of Special Educational Needs & Disabilities (SEND) team and identify need for additional capacity to ensure effective delivery going forward	Assistant Director Education & Skills	75	31/08/20	26/03/20	31/08/20
<b>Comments:</b> Service working with HROD to recruit to the agreed vacancies in the team. Review undertaken by Interim Lead for Home to School Transport to be taken through approval procedures to AD Education & Skills and reported onto Policy & Resources Committee in June 2020.					
Work with PACC and aMAZE to restore parental confidence via a co-produced 'lessons learned' and strategic action plan	Assistant Director Education & Skills	75	31/12/20	17/01/20	31/12/20
<b>Comments:</b> Delivery Plan agreed at CYP Committee and being reviewed further by a Member Policy Panel in July 2020					

