

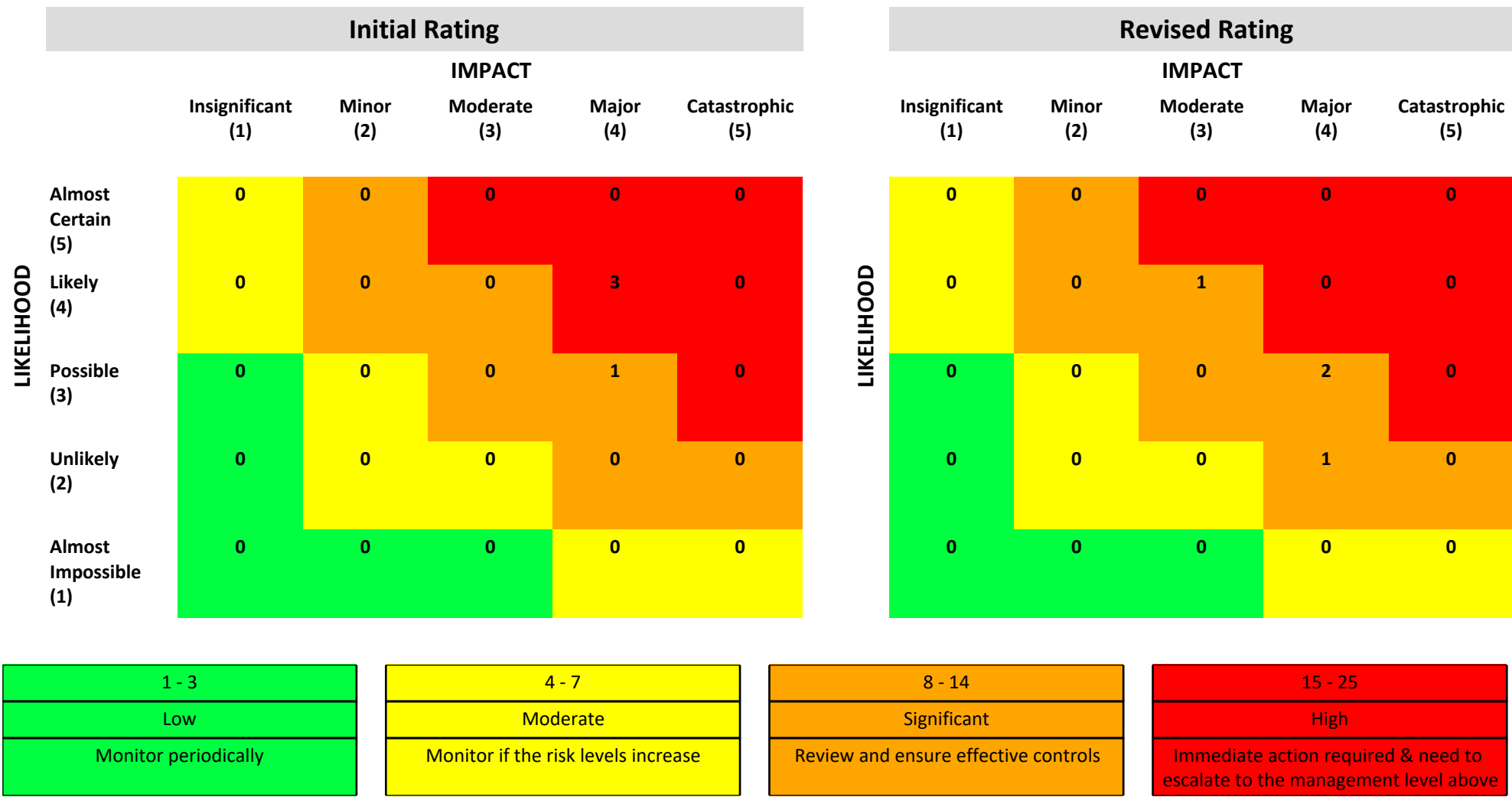
Brighton & Hove City Council

Appendix 1: Strategic Risk Report

SR10, SR18, SR30 and SR32

Print Date: 30-Nov-2020

30-Nov-2020



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	Corporate information assets are inadequately controlled and vulnerable to cyber-attack	Chief Executive Head of Strategy & Engagement	BHCC Strategic Risk, Legislative	18/11/20	Threat	Treat	<div style="background-color: red; color: white; 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 Outcome: ' A well run city: Keeping the city safe, clean, moving and connected'.

Causes:

1. Inadequate Cyber Security
2. Inadequate Information Governance (IG)
3. Inadequate Information Management

Variability of the organisation's information asset is constant. The complexity and sophistication of cyber threat is ever-increasing and requires a constantly evolving approach to cyber security, information governance and information management to combat this threat.

Potential Consequence(s)

- A successful large-scale cyber-attack could halt the entire operation of the organisation. A successful smaller scale cyber-attack could interrupt operations for several services
- The organisation could suffer severe reputational damage and/or financial loss
- Service users could suffer financial loss, increased levels of vulnerability and death due to the lack of operational services
- 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 lends itself to poor data protection practices including non-compliant sharing of data and information breaches

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
CYBER SECURITY: Compile a 'Systems League Table' to measure the relative 'risk' of the top 25 systems in use at BHCC to act as a comparison of maturity and a signpost for future work	Head of Strategy & Engagement	25	31/03/21	01/04/20	31/03/21
Comments: Oct '20 update: This work has been de-prioritised and has not progressed. Delivery dates have now been set to March 2021					
CYBER SECURITY: Improve Information Risk Management function. This will include a risk register visible to IGB, SIRO & DPO and clear processes and guidance.	Head of Strategy & Engagement	80	30/09/20	01/04/20	30/09/20
Comments: Oct. '20 update: New draft register has been completed. Requires management/SIRO review and sign off					
CYBER SECURITY: Migrate all on prem 2012 servers (x257) to ODC1 before end of support in 2022	Head of Strategy & Engagement	0	31/03/22	01/10/20	31/03/22
Comments: n/a					
CYBER SECURITY: Remove 'to be' unsupported Win7 o/s and migrate all devices to Win10	Head of Strategy & Engagement	50	31/03/21	01/04/19	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Comments: Oct. '20 update: Win10 migration has now restated following a 4/5month pause due to the covid-19 pandemic. Laptop rollout is expected to run until November/December 2020. Desktop replacement will complete by February 2021.					
CYBER SECURITY: Review and improve the Incident Management process, including better use of Cherwell.	Head of Strategy & Engagement	25	31/08/20	01/04/20	31/08/20
Comments: Oct. '20 update: This work has been subsumed into a large Orbis wide review of Cherwell will consequently take significantly longer. Any 'quick wins' which can be applied outside of this work are being reviewed.					
CYBER SECURITY: Review and improve user access controls via the Access Management project	Head of Strategy & Engagement	40	31/12/20	02/04/18	31/12/20
Comments: Oct. '20 update: The Access Modernisation has restarted following a pause during covid-19 recovery. Timescales for project delivery are in the process of being revised. Work on migrating online 'starters, leavers and movers' form from Achieve to Drupal is underway.					
INFORMATION GOVERNANCE: Complete the submission for the NHS Digital Data Security and Protection Toolkit	Head of Strategy & Engagement	100	30/09/20	01/06/20	30/09/20
Comments: Oct. '20 update: Submission made 30/09/20					
INFORMATION GOVERNANCE: Deploy MetaCompliance MetaPlatform to support an improved approach to information asset management in the business	Head of Strategy & Engagement	30	31/12/20	01/07/20	31/12/20

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Comments: Oct. '20 update: Joint Orbis project underway. Design work in complete and testing is scheduled to start October/November followed by full rollout and IAO training in the New Year					
INFORMATION GOVERNANCE: Lead a cross-dept. collaboration to develop a surveillance camera toolkit to support compliant acquisition, monitoring and evolution of surveillance cameras across the local authority	Head of Strategy & Engagement	0	31/03/21	01/10/20	31/03/21
Comments: n/a					
INFORMATION GOVERNANCE: Re-write key Policies and complete 'Standards' document to enable staff and third-parties to understand and comply with our requirements.	Head of Strategy & Engagement	80	30/09/20	01/06/20	30/09/20
Comments: Oct. '20 update: The majority of policy documents have been reviews/updated (3 remaining). Standard documentation work is underway					
INFORMATION MANAGEMENT: Deployment of unstructured content analytics capability to analyse metadata of S: drive and email content, identify duplicates and versions and then analyse document contents to inform management decisions around retention, destruction and data quality improvement.	Head of Strategy & Engagement	10	31/12/20	01/04/20	31/12/20
Comments: Oct. '20 update: This work has not progressed. Currently reviewing possible O365 options to decide if new capability requires procurement					

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
INFORMATION MANAGEMENT: Develop an information architecture for the O365 Teams/SharePoint.	Head of Strategy & Engagement	90	31/10/20	01/04/20	31/10/20
Comments: Oct. '20 update: High level information architecture is complete. Sign off at joint Orbis Architectural Review Groups is scheduled for October.					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR18	The organisation is unable to deliver its functions in a modern, efficient way due to the lack of appropriate technology	Head of Human Resources & Organisational Development Head of Strategy & Engagement	BHCC Strategic Risk, Technological	18/11/20	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
Sub-optimal technology capabilities: Deploy O365 information management applications to all Win10 users, including OneDrive, SharePoint and full Team.	Head of Strategy & Engagement	25	31/12/21	01/04/20	31/12/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Comments: Oct. '20 update: IA design is complete (awaiting sign off) and planning for deployment is underway. Migration of existing SharePoint content is planned to start in October 2020.					
Sub-optimal technology capabilities: Deploy O365 productivity applications to all Win10 users, including Teams for communications, Planner, Whiteboard and Sway.	Head of Strategy & Engagement	25	31/12/20	01/04/20	31/12/20
Comments: Oct. '20 update: Deployment of MS Teams for communications has been brought forward due to c-19 (deployed June 2020). Other O365 is Win10 dependent and will rollout in full on completion of the Windows10 project.					
Sub-optimal technology capabilities: Further increase workforce productivity through provision of wi-fi for all office spaces	Head of Strategy & Engagement	0	31/12/20	01/10/20	31/12/20
Comments: Oct. '20 update: Final phase of the project may be delayed due to c-19					
Sub-optimal technology capabilities: Secure investment and initiate a project to replace the organisations telephony infrastructure to better meet the needs of a modern workforce and the customer contact strategy.	Head of Strategy & Engagement	10	31/03/21	01/04/20	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Comments: Oct. '20 update: Lack of resource capacity has slowed progress. A project will be up created once Win10 laptop deployment has completed					
Sub-optimal technology capabilities: Social Care and Housing service projects to replace core systems of record and establish improved data management practices	Head of Strategy & Engagement	50	31/03/21	20/04/17	31/03/21
Comments: Oct. '20 update: Both CareFirst replacement and OHMS replacement projects are in delivery phase and are broadly on track.					
Sub-optimal technology capabilities: Upgrade all existing BHCC versions of Dragon to the Group SaaS model	Head of Strategy & Engagement	0	31/01/21	01/10/20	31/01/21
Comments: Oct '20 update: Project will commence on completion of the exceptions workstream (AT users) of Win10 project					
Sub-optimal technology capabilities: Upgrade all laptop and desktop devices, (plus the Citrix environment) to Windows 10 before the end of extended support for Windows 7 in early 2021. Additionally, increase the laptop estate from approx. 2000 devices to 4000 devices.	Head of Strategy & Engagement	70	31/03/21	01/03/18	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: Oct. '20 update: Extended support (until Feb 2021) has been procured for remaining Windows7 devices. Win10 migration has now restated following a 4/5month pause due to the covid-19 pandemic. Laptop rollout is expected to run until November/December 2020. Desktop replacement will complete by February 2021. 95% of Citrix users have been migrated to the new Win10 environment</p>					
<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>Head of Strategy & Engagement</p>	<p>80</p>	<p>31/08/21</p>	<p>01/04/19</p>	<p>31/08/21</p>
<p>Comments: Oct '20 Update: Activity on the Digital programme is focused on 4 workstreams: 1.Website content transition– complete. 2.My Account Initial phases are now live. Development of improved capabilities and addition of new data sets/services is ongoing 3.Customer and Property Indices The Customer Index is continuing to progress with further improvements and enhancements being made to dataset matching. Ongoing development focusing on increasing the number and scope of additional datasets added to the Index and additional business intelligence derived from the combined data e.g. fraud. 4.Contact management Contact management capability is now live with new services continuing to be brought on stream. Work will be reviewed and reprioritised once a new Digital Strategy is published in the New Year.</p>					

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	18/11/20	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; and Ofsted focused visit in February 2020 looking at services to children in need and child protection plans resulted in positive comment.
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
Comments: 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
Comments: This is a significant time for this risk. Work is taking place as follows: <ol style="list-style-type: none"> 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 has all but paused due to ongoing focus on Covid response work 4. The new administration has confirmed that the Corporate Plan will not be re-written but there may need be clearer prioritisation and clearer delivery schedules for outcomes and progress. 5. Very positive and collaborative work is ongoing on the council's climate assembly and Carbon2030 programme. <p>Work still needs to be undertaken with the administration and the DMTs to understand immediate and longer term priorities so that the Communications Team can run a series of year-long holistic communications and PR campaigns and activities with specific objectives and audiences, clear and consistent messaging and means of evaluation.</p> <p>The Communications Service redesign will also include the ask from the new administration to have a stronger focus on consultation and engagement.</p>					
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>Comments: Sept 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 & 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>Comments: 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	54	31/03/21	12/02/20	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: 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 & 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 August 2020 data, complaints have reduced and compliments increased compared to average of previous 3 years, escalation of complaints broadly has remained the same. the current focus has been to ensure a pragmatic accessibility offer across the organisation which doesn't adversely impact on those who are digitally excluded.</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>Comments: 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&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	60	31/03/21	14/02/17	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: Strategic Delivery Board is overseeing the City's Investment Programme of regeneration and infrastructure projects. 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>Greater Brighton Economic Board has established an Infrastructure Panel that is overseeing the development of Energy and Water Plans for Greater Brighton. Energy and Water Plans were approved July 2020.</p> <p>Greater Brighton Economic Board considering an investment pipeline of infrastructure projects to support economy recovery following Covid19 public health crisis.</p> <p>- Cross party working group for major regeneration projects have recommenced from July 2020 following pause during Covid-19 public health crisis</p> <p>Next Steps:</p> <p>- Continue to progress investment programme and project pipeline to deliver major regeneration projects and investment in infrastructure</p> <p>- Draft Covid-19 Economic Recovery Plan to be presented to the Greater Brighton Economic Board October 2020</p>					
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
<p>Comments: The Performance Management Framework (PMF) is operating well across the organisation. Performance information regarding all 8 elements of the framework gets regularly updated on wave. Dashboard gets produced every 6 months 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.</p>					
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>Comments: 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 & 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

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: Collaboration Framework Action Plan signed off by city's Equality and Inclusion Partnership July 2018 and is a standing item at each meeting monitor progress and manages risks. At the April 2019 Partnership meeting it was agreed that during the second year of the Framework there would be six workshops every two months on each of the 6 principles to ensure the practice was embedded, creating buy-in and for organisations to pledge actions rather than carrying out 12 month review leading to a set of recommended actions. However, due to a change in priorities for the lead officer for the Collaboration Framework these workshops 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). develop of the taskforce and action plan were paused due to Covid-19 emergency. The Programme coordinators - COMPAS– the Centre on Migration Policy And Society within University of Oxford called a meeting with BHCC in September to update on the restart of the programme. It was agreed that Brighton and Hove will have its first city task force meeting by the end of October 2020. The council's Lead Member for Equality and lead officer working on Inclusive city will attend the next Inclusive Cities programme meeting being held, virtually, in in early November. COMPAS have not given a deadline for the completion of action plan. This will be discussed at the B&H taskforce meeting.</p>					
Programme to enhance the council's role to support the city economy and promote business	Executive Director Economy, Environment & Culture	60	31/03/21	14/02/17	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Comments: The EEC directorate reports Major Projects updates to Strategic Delivery Board.					
<ul style="list-style-type: none"> - Government Business Grants and Discretionary Grants delivered to business that are impacted by Covid-19 - Greater Brighton Economic Board have commissioned an economic impact assessment of Covid-19 - City Recovery Programme Governance Structure established with an events and Economy Working Group focused upon supporting local business and economic recovery 					
Next Steps					
<ul style="list-style-type: none"> - Economic Recovery Plan to be developed and presented to Greater Brighton Economic Board– November 2020 -City Recovery Plan to be developed and presented to P&R Recovery Sub Committee - Arts & Culture sector recovery plan to be developed with sector partners and presented to TECC Committee January 2021 					

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	18/11/20	Threat	Treat	 L4 x I4	 L3 x I4		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. COVID-19 response; 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 Recovery Working Groups covering specific aspects or Directorates (e.g. PPE, Vulnerable People, CYP and Ways of Working 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. Assurance work underway in relation to quality checking school Covid-19 re-opening risk assessments and council services COVID-19 Secure Developing an approach to assurance activity 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 Teams 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 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 Feb2019 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 16/09/20.

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'.	Compliance and Transformation Manager	55	31/03/22	01/04/19	31/03/22
<p>Comments: Well Workforce Survey launched by Public Health in liaison with the Wellbeing Steering Group Feb20. Data analysed by Public Health shared with Wellbeing Steering Group., however response to COVID-19 has taken precedence. Staff wellbeing work is currently being focused on within the 'Ways of Working' (WOW) working groups and as a result a 'Pulse survey' was commissioned and undertaken in June-July2020 focusing on staff wellbeing as a result of the impact of COVID-19 work and lockdown. The results of the survey have been analysed and presented to ELT16/09/20 to help inform decisions about wellbeing focus going forward. The output/ work of the WOW working group is shared with staff forums and the Unions for consultation.</p> <p>A dedicated wellbeing page was developed on the councils website at the start of the pandemic and this has been maintained and developed as the main source of resources for staff/ their families.</p>					
Engagement of independent health & safety consultancy RoSPA to undertake a review of our corporate H&S arrangements	Compliance and Transformation Manager	60	01/01/21	01/06/19	01/01/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Comments: 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 with RoSPA to re-establish the focus of the audit given the current COVID-19 priority work with consideration of whether the audit could now include COVID-19 Secure assurance. Audit planned to take place at the end of October - dates TBC					
Ensure H&S implications are in the corporate response framework for COVID-19	Compliance and Transformation Manager	75	31/03/22	07/02/20	31/03/22
Comments: Active representation in all corporate COVID-19 working groups that have a H&S implications; ongoing reporting through the COVID-19 meetings and consultative groups; 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
Comments: 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 Housing Cttee.					
Re-assess Team requirements to deliver an effective H&S service to manage this risk (both core and COVID-19 risks)	Compliance and Transformation Manager	50	31/03/22	01/09/20	31/03/22

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: During the onset of the pandemic, the activity of the Corporate H&S Team was reviewed to ensure service delivery would continue during lockdown. Changes were made to the Duty Officer system and H&S officers remained contactable and available throughout the lockdown period. The service continue to predominantly work from home with essential site visits including fire risk assessment work now being undertaken. The Strategic Action Plan will be reviewed to ensure covid-19 work streams can be delivered alongside 'business as usual' H&S work. This will include re-prioritising the work activities identified and identifying any resourcing pressures which will be escalated to ELT as necessary.</p>					

