

## Appendix 3: Strategic Risk Register

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<b>SR02</b> Chief Finance Officer	Failure to develop and deliver a Medium-term financial strategy (MTFS) to ensure financial sustainability and resilience	2
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Risk Code	Risk Title	Responsible Officer	Initial Risk Score	Target Risk Score
SR02	Failure to develop and deliver a Medium-term financial strategy (MTFS) to ensure financial sustainability and resilience	Chief Finance Officer	20 L5 x I4	16 L4 x I4
Appetite				Cautious
<p>The council has a 'cautious' appetite for financial risks and puts in place appropriate controls through governance, policies, and procedures to manage risk.</p> <p>This means that the Council will continue to undertake very secure activities in a controlled manner, such as:</p> <ul style="list-style-type: none"> <li>• appropriately limited delegations for making significant financial decisions</li> <li>• robust planning, reporting and monitoring procedures</li> <li>• options to invest and funding sources considered for delivery of transformation and invest-to-save proposals</li> <li>• value for money and tangible benefits (cashable and otherwise) considered to achieve service benefits and deliver a sustainable solutions</li> </ul>				
Causes				
<ul style="list-style-type: none"> <li>• Increasing cost and demands across demand-led services such as social care and homelessness, and rising inflation and cost of living implications</li> <li>• Long-term reduction in central government funding not able to be offset by local taxation or fees &amp; charges</li> <li>• Successive one-year local authority financial settlements making longer term planning difficult</li> <li>• There is a cumulative impact of reductions in government funding to other public agencies in the city potentially increasing demand on council services</li> </ul>				
Potential Consequence(s)				
<ul style="list-style-type: none"> <li>• potential need to request Emergency Financial Support (EFS) from the Ministry of Housing Communities and Local Government (MHCLG)</li> <li>• Unable to deliver Council Plan priorities and other council services to expected standards</li> <li>• worst case if members are unable to balance the budget, may need to issue a Section 114 notice to full Council potentially leading to Government Intervention</li> </ul>				
Existing Controls				
First Line of Defence: Management Controls				

<ol style="list-style-type: none"> <li>1. Ongoing review of the adequacy of risk provisions and reserves to support the medium-term budget strategy and to support financial resilience.</li> <li>2. Medium term resource projections (MTFS) and estimates of demographic and other changes in costs to ensure that budget shortfalls (gaps) are identified ('outed') at the earliest opportunity and planning can begin at an early stage to address predicted gaps including identification of taxation strategies and savings programmes and options.</li> <li>3. Savings proposals and options are developed in the context of Council Plan priorities ('Guideline Criteria') and budget categorisation (e.g. statutory v discretionary budgets).</li> <li>4. Consultation and engagement with the Leadership (member oversight) and partners (particularly the NHS ICS) for development and approval of the annual budget led by the Corporate Leadership Team (CLT) and the Chief Finance Officer (CFO).</li> <li>5. Targeted Budget Management (TBM) projections are undertaken to accompany budget reports to Cabinet (and Budget Council) to ensure in-year trends and pressures, and capital programme implications, are reflected in future resource projections and budget setting</li> <li>6. Taxbase forecasts and projections are updated and reflected in the Medium-Term Financial Strategy (MTFS) and annual budget proposals and reported by the statutory deadline (31 January).</li> <li>7. Investment requirements are reviewed and funding flexibility identified to ensure delivery of modernisation/transformation and invest-to-save proposals.</li> <li>8. Key control: annual revenue and capital budgets are approved by Budget Council in February with a balanced budget, 'funded' capital programme, and a clear plan to contribute to or replenish reserves or the working balance where required</li> <li>9. 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 financial management or vacancy controls</li> </ol>
<b>Second Line of Defence: Corporate Oversight</b>
<ol style="list-style-type: none"> <li>1. Regular monitoring and review by CLT and Cabinet 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</li> <li>2. Oversight of pooled funds and integrated arrangements through separate governance arrangements including Health &amp; Wellbeing (HWB) Board and BHCC - NHS officer meetings.</li> </ol>
<b>Third Line of Defence Independent Assurance:</b>
<ol style="list-style-type: none"> <li>1. Annual review of Value for Money (VfM) arrangements by the External Auditor leading to an opinion in the annual audit report. The last review (2022/23) concluded there were significant weakness in arrangements identified in relation to financial sustainability, with key recommendations made and two improvement recommendations raised.</li> <li>2. Internal Audit reviews on all aspects of financial management, governance and reporting are undertaken on a rolling basis to provide management with assurance and recommendations for improvements. The Audit Plan and Strategy is agreed and monitored by Audit, Standards &amp; General Purposes Committee on an annual basis. The committee also receives reports on high priority actions and limited assurance audits.</li> </ol>

Action title	Owner	Action status
Develop a 4-year balanced medium term financial plan and a fully funded capital programme	Nigel Manvell	Action required
Decrease the number of households in temporary accommodation to reduce council expenditure and provide quicker access to settled accommodation.	Paul Cooper	Monitor

Risk Code	Risk Title	Responsible Officer	Initial Risk Score	Target Risk Score
SR10	Failure to adequately protect information assets from a successful cyber-attack impacting our ability to deliver a responsive council with well-run services	Corporate Director Corporate Services	16 L4 x I4	12 L3 x I4
<b>Description</b>				
<p>BHCC is highly dependent on its digital information asset (more than 300 business systems containing 10's of millions of records and more that 20 million inbound and outbound emails a year).</p> <p>This asset is vulnerable to cyber-attack from several threat actors including employees, cyber criminals, hackers and to some extent foreign states.</p> <p>In addition to an intentional cyber-attack, the sensitive information (personal citizen information or corporate sensitive information) is vulnerable to accidental loss or accidental publication.</p> <p>The growing volume of digital information (compounded by the tendency to over retain information), the pervasiveness of digital technologies and sophistication of cyber threat requires a constantly evolving approach to cyber security, Information Governance (IG) and Information Management to combat this threat.</p> <p>The ways of working adopted by the council following the Covid-19 (C-19) pandemic heightens this risk and would make recovery more challenging.</p>				
<b>Appetite</b>				Minimal
<p>The council has a minimal appetite for information governance and security risks with strong policies and procedures in place.</p> <p>The means the council:</p> <ul style="list-style-type: none"> <li>• ensures our IT infrastructure meets UK and international regulatory standards</li> <li>• is unwilling to have any risk exposure related to customer and staff data</li> <li>• embed comprehensive procedures for the identification and resolution of incidents that present a threat to information security</li> </ul> <p>is willing to share data, within a controlled framework, for the benefit of customer outcomes</p>				
<b>Causes</b>				

A lack of automation in removing data following retention periods increases the risk  
 A recent increase in cyber threat to smaller organisations means Local Authorities are being targeted more  
 Limitations with learning platform alongside capacity and resource restraints mean there is less awareness of cyber threat across the council  
 leading to poor decision making  
 Ability to protect data -  
 Information risk capacity issues?  
 Poor records management / data protection across the council (locally within services)

### Potential Consequence(s)

- A successful large-scale cyber-attack could halt the entire operation of the organisation. A successful medium scale cyber-attack would severely disrupt services by preventing access information, payments and/or communication. This would have a tangible impact on citizens lives and greatly increase the potential for physical harm and even death due to the impact on service delivery
- A successful medium scale cyber-attack would have serious financial impact. The cost of recovery and repair (and potentially imposed penalties) is likely to exceed £10million
- Any loss of data (either through attack or accident) is likely to damage the council's reputation with the public who entrust us with their information
- The Public Services Network (PSN) & Health & Social Care Information Centre (HSCIC) could impose operational sanctions which would be catastrophic for many services.

### Existing Controls

First Line of Defence: Management Controls

#### Prevention - Technical Controls

- Corporate firewall to monitor and control incoming and outgoing network traffic.
- Hard drive protection to prevent access to information on lost or stolen devices.
- Password policy in line with NCSC (National Cyber Security Centre) advice.
- Hosting in a tier three, ISO 27001 Certified datacentre.
- Secure e-mail (using NCSC Mail Check to maintain DMARC, SPF, DKIM and TLS configurations).
- Patching regime in place across entire estate.
- Annual health checks and penetration tests.
- Membership of South East WARP (Warning, Advice and Reporting Point) organised by the National Cyber Security Centre) providing up-to-date advice on information security threats, incidents and solutions.
- IT&D incident management process integrating data breach and cyber security incidents.
- Procurement of all new and changed applications is subject to review against IS and IG standards.

#### Prevention – Behavioural Controls

- 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).
- Online IG training is published on the learning gateway and cyber-security sessions delivered by the local police cyber-crime unit have been made available to all staff.
- A variety of guidance materials (including guidance on strong password creation, phishing and working from home safely during c-19) are published on the Wave.
- Privacy impacts assessments (PIAs) conducted for all new business process and systems involving personal information.

#### Recovery Controls

- Documented major incident process in place.
- Basic recovery procedures documented for major systems.
- Full backups of business data for all internally hosted application.
- Shared Orbis expertise - 5 CISSP (Certified Information Systems Security Professional) qualified staff working in the partnership.
- Managed relationship with ICO (Information Commissioners' Office).

### Second Line of Defence: Corporate Oversight



- 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. - A suite of Information Governance Policies are regularly reviewed and approved by IGB.
- An information risk register is regularly reviewed by Information Governance Board (IGB) and the Senior Information Risk Owner (SIRO).
- The Senior Information Risk Owner (SIRO) is briefed monthly on areas of risk.
- The Caldicott Guardians (Corporate Directors for Families, Children & Learning; and Housing, Care & Wellbeing) have corporate responsibility for protecting the confidentiality of Health and Social Care service-user information and enabling appropriate information sharing.
- The Information Governance Team operates as an independent function to provide advice, guidance and oversight in key areas.
- Information Governance and Cyber Security receives oversight from the Audit and Standards Committee.
- 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:

##### Internal Audit:

2023/24: Procurement of IT Systems (Reasonable Assurance), Surveillance Cameras follow up (Reasonable Assurance), Robotic Process Automation (Reasonable Assurance), Eclipse Application Control (Reasonable Assurance), Accommodation Strategy & Workstyle Programme (Reasonable Assurance), Adult Services Data Handling (Reasonable Assurance), Childrens Services Data Handling (Reasonable Assurance), PCI/DSS (Partial Assurance)

2022/23: IT Asset Procurement (Value for Money) (Substantial Assurance); ; Cyber Security (Reasonable Assurance); MetaCompliance IT Application (Reasonable Assurance)

2021/22: Email Communication - personal and sensitive encryption (Reasonable Assurance), DWP/Searchlight System Security Compliance (Reasonable Assurance), PIER Application Control (Reasonable Assurance), Information Governance - Remote Working (Reasonable Assurance), IT Access Management (Reasonable Assurance), Network Security (Reasonable Assurance), Network Access Management (follow up) (Reasonable Assurance); IT&D Strategic and Operational Risk Management (Reasonable Assurance); Post-Brexit Information Governance (Substantial Assurance)

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).

Risk / Action title	Owner	Action status
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Review the council's information governance vulnerabilities and cyber risks, and develop an action plan to reset and strengthen policy and processes to better manage the risks	Dan Snowdon	On-track
Prevention - Technical Controls: Improve the Council's Information Risk Management process maturity. This will include elevating the visibility of the risk register, implementing technical solutions to improve information asset management and publicizing clear processes and guidance.	Dan Snowdon	On-track
Prevention - Technical Controls: Review and improve user access controls (network and application access rights for starters, leaver and movers) via the Access Management project	Dan Snowdon	On-track

Risk Code	Risk Title	Responsible Officer	Initial Risk Score	Target Risk Score
SR13	Failure to ensure effective safeguarding arrangements to keep adults safe	Corporate Director Housing, Care & Wellbeing	16 L4 x I4	12 L3 x I4
<b>Description</b>				
<p>The council has a duty to keep adults, for whom they have statutory responsibility for, safe from harm and abuse. Brighton &amp; 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.</p> <p>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.</p>				
<b>Appetite</b>				Averse
<p>The Council has an averse appetite for risks materialising that are associated with the preventable deaths, serious injury or serious harm to vulnerable adults, children, and young people that we have responsibility for.</p> <p>This means the Council:</p> <ul style="list-style-type: none"> <li>• have robust recruitment processes which incorporate safeguarding requirements such as disclosure and barring service (DBS) checks, checking references, proof of qualification and professional registration.</li> <li>• has clear and well communicated policies and procedures</li> <li>• monitors meaningful performance metrics to act as early warning signs</li> <li>• Professional oversight, in terms of staff supervision and inspections by the Care Quality Commission and Ofsted.</li> <li>• maintains up to date and accurate risk records in relation to safeguarding adults and safeguarding children</li> <li>• works in partnership with key organisations to monitor safeguarding delivery across all agencies in the city</li> <li>• has strong controls in place to ensure any organisations delivering services on behalf of the council have robust safeguarding arrangements in place</li> </ul>				
<b>Causes</b>				

- Increase in complexity of demand in adult social care
- High-level of drug use, homelessness and mental health issues across the city
- Insufficient appropriate accommodation and services in the city for those with significant and complex needs or specific needs such as ABI, Physical Disability, Learning Disability or Mental Health
- Increased cost of living and changes to government legislation and funding (winter pressures, autumn budget), pressures on the health and care system as a whole and pressures on resourcing and budgets across the sector with rising costs in the provider market

### Potential Consequence(s)

- Failure to care for and safeguard adults properly could result in death, abuse, neglect or injury to individuals.
- Failure to meet statutory duties could result in legal challenge and reputational damage to the organisation and public trust
- Inequalities could be created in terms of how disadvantaged groups of our community i.e. multiple and complex needs can access care and support services
- Provider market costs continue to rise which could lead to overspend of budget to meet statutory responsibility
- Service users may need to move out of the city to receive services required
- People are placed in inappropriate accommodation which may present a danger or risk to them or others and people may not get the appropriate services and support to address their needs
- 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. Performance management across adult social care enables a more informed view on current activity and planning for future service changes and reviewed monthly by Finance & Performance Board. A BHCC Safeguarding Adults performance dashboard is provided monthly. Overseen by Directorate Management Team.
2. The CQC Inspection Preparation Group have completed a self-assessment and identify areas to improve assurance and monitor progress.
3. Brighton and Hove Safeguarding Adults Board (BHSAB) work plan, multi agency safeguarding adult procedures, multi-agency partnership commitment, Safeguarding Adult Reviews, reflective and systemic learning and engagement, 4. Dedicated resources for: safeguarding adults S.42 decision making; oversight, specialist advice and guidance of complex people in a position of trust; input into Domestic Homicide multi agency review panel; co-ordination of all Deprivation of Liberty Safeguards (DoLS) referrals in line with statutory requirements; continuous professional development requirements in line with Social Work Professional Capabilities Framework . A Practice Development Assurance Board is in place and meeting monthly to consider practice development and assurance areas of focus bringing updates from internal partners and data share.
4. Safeguarding Steering Group to support implement learning into practice.
5. Safeguarding referrals can be made by anyone including other professionals, GPs, Police, neighbours, friends. Safeguarding referrals are assessed by Social Workers.
6. BHCC Quality Monitoring Team oversee process in place to monitor quality of adult social care providers, in partnership with NHS Sussex and Care Quality Commission (CQC), which supports quality and preventative safeguarding objectives. Provider failure business continuity plans are in place.
7. Panels in place to provide support and challenge - accommodation, authorisation, community equipment, multi-agency risk management
8. DBS Monitoring
9. Homelessness Transformation Programme
10. Multiple Compound Need Programme (Changing Futures)
11. Housing Allocations Policy
12. The Health and Wellbeing Strategy is delivering the Joint Strategic Needs Assessment on people with multiple and complex needs as part of its Living Well and Ageing Well Workstreams. The Changing Futures Programme (Sussex wide) is in place with external partners and organisations to consider this area and systemic change, development and training needs to bring the system together to consider development needs in this area.

#### Second Line of Defence: Corporate Oversight

<p>1. Pan Sussex Safeguarding Adults procedures group - robust partnership group producing specialist procedural guidance across the Sussex area and protocols and meets quarterly with working groups between to complete multi agency tasks together. Strong multi agency working together is featured consistently and is Sussex wide so takes a broader view. Protocols and guidance designed and issued is often across the County which provides a stronger collaborative approach.</p> <p>2. Health &amp; Wellbeing Board oversees Joint Health &amp; Wellbeing Strategy and BHSAB annual report.</p> <p>3. Care Governance Board oversees quality monitoring of care services and attended by CQC.</p> <p>4. Service Improvement Panel – with multiagency partners, including NHS Sussex ICB, to share inspection results, complaints, and other issues for care provider quality.</p> <p>5. Mental Health Oversight Board and Community Oversight Board</p> <p>6. Prevent Board</p> <p>7. Community Safety Partnership Board</p>		
Third Line of Defence Independent Assurance:		
<p>1. For the council's in-house registered care services Care Quality Commission (CQC) Inspections on an on-going regular basis. From 2023, all local authority adult social care services will be inspected by CQC.</p> <p>2. CQC's programme of inspections of all registered care providers are published weekly and available on CQC's website <a href="http://www.cqc.org.uk">www.cqc.org.uk</a>.</p> <p>3. Brighton &amp; Hove Safeguarding Adults Board (BHSAB) is independently chaired and meets quarterly with the three statutory agencies for city wide safeguarding assurance. The Safeguarding Lead is a member of the SAR panel (multi agency, chaired by independent sector) where referrals for reviews are discussed in depth.</p> <p>4. Local Government Association Test of Assurance in September 2022 provided recommendations that were reviewed at follow up session in April 2023.</p> <p>5. Internal Audit</p> <p>2023/24: Adult Services Data Handling (Reasonable Assurance)</p> <p>2022/23: Adult Social Care (In-house services) (Reasonable Assurance); Direct Payments (follow up) (Partial Assurance); ASC Financial Assessments (Partial Assurance)</p> <p>2021/22: HASC Modernisation Programme (Reasonable Assurance), Direct Payments (Partial Assurance), Home Care (Reasonable Assurance); Care Payments (Reasonable Assurance)</p>		
Risk / Action title	Owner	Action status
Collaborate with city partners in delivering the Community Safety Strategy to address drug related issues in the city and tackle violence against women and girls	Jim Whitelegg	On-track

Implement the Homelessness Transformation Strategy to improve the customer journey for people facing homelessness and maximising opportunities to prevent homelessness	Paul Cooper	On-track
Review the Homelessness and Rough Sleeping Strategy to prevent homelessness and support homeless people and rough sleepers to access and settle in accommodation.	Paul Cooper	On-track
Improve the health and wellbeing of adults across the city through the delivery of our Living Well programmes: - Physical Activity & healthy weight - Public Mental Health and Suicide Prevention - Drugs & alcohol - Tobacco control & stop smoking - Sexual health	Caroline Vass	Monitor
Commission services to ensure that people and their carers have the support they need including the adoption of technology enabled care.	Andy Witham	On-track
Support the delivery of the Safeguarding Adults Board (SAB) Strategic Plan	Michelle Jenkins	On-track
Improve and maintain performance and quality in social care, preparing for the Care Quality Commission (CQC) assurance	Richard Cattell	On-track
Ensure that mandatory PREVENT training is embedded in all training induction and development plans within the organisation to support effective identifiers and that the referral pathway is known	Nahida Shaikh	On-track
Provide assurance that there is a comprehensive clear Disclosure and Barring Service (DBS) check and recheck process in place which reduces risk to the organisation and to the community	Jenny Holmes	Monitor

Risk Code	Risk Title	Responsible Officer	Initial Risk Score	Target Risk Score
SR15	Failure to ensure effective safeguarding arrangements to keep children and young people safe from harm and neglect	Corporate Director Families, Children & Learning	16 L4 x I4	12 L3 x I4
<b>Description</b>				
<p>Link to Council Plan 2023-27. Outcome 3: 'A Healthy city where people thrive, and actions linked to 'A better future for children and young people' Keeping vulnerable children safe from harm and neglect is a legal responsibility of the Council. Legislation requires all local authorities to act in accordance with national guidance (Working Together 2023) to ensure robust safeguarding practice. This includes the responsibility to ensure an effective multi-agency safeguarding response. In Sept. 19 the Brighton &amp; Hove Safeguarding Children Partnership (BHSCP) was established led by the three key statutory partners – Brighton &amp; Hove City Council; Sussex Police &amp; NHS Sussex.</p> <p>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 harm, 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, harm and neglect may lead to a child's death.</p>				
<b>Appetite</b>				Minimal



The Council has a minimal appetite for risks materialising that are associated with the preventable deaths, serious injury or serious harm to vulnerable adults, children, and young people that we have responsibility for.

This means the Council:

- have robust recruitment processes which incorporate safeguarding requirements such as disclosure and barring service (DBS) checks, checking references, proof of qualification and professional registration.
- has clear and well communicated policies and procedures
- monitors meaningful performance metrics to act as early warning signs
- Professional oversight, in terms of staff supervision and inspections by the Care Quality Commission and Ofsted.
- maintains up to date and accurate risk records in relation to safeguarding adults and safeguarding children
- works in partnership with key organisations to monitor safeguarding delivery across all agencies in the city
- has strong controls in place to ensure any organisations delivering services on behalf of the council have robust safeguarding arrangements in place

#### Causes

- demand outweighing resources
- workforce capacity and capabilities
- lack of robust governance and management oversight
- lack of internal information sharing at the right time - weakness in internal controls/processes leading to delay in information sharing
- increased threats within the city, for example county lines
- weakness in partnership arrangements and processes
- demands outweighing resources for key external partners, for example schools, health or police, may delay the council's ability to take preventative, early or pro-active action

#### Potential Consequence(s)

- a child suffers harm or neglect, potentially fatally
- may be brought into social care system
- unlikely to achieve satisfactory levels of health or development
- family members suffer harm or neglect or emotional upset
- poorer outcomes in a wide range of areas
- need to conduct child safeguarding practice review, which is reported to the DfE
- impact on Ofsted rating
- reputational damage to the council
- unable to recruit high quality staff
- criminal charges against staff
- increased scrutiny by independent regulators, including the ombudsman

#### Existing Controls

First Line of Defence: Management Controls

1. Robust quality assurance and performance management framework embedded and reported quarterly to Directorate Performance Board and onto the Corporate Leadership Team bi-annually.
2. Single point of access ('Front Door for Families') for support and safeguarding issues relating to children. The Front Door is 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 Safeguarding Children's Partnership (BHSCP) Work Plan established with strong leadership by the Independent Scrutineer with aligned BHSCP sub-group work plans
4. Safeguarding Practice, Local Management and Child Death Reviews identify learning and action for improvement
5. A strong focus on working with CYP at risk of being missing from care, home and education
6. The local Supporting Families programme targets support to the most vulnerable families
7. Continuous professional development (CPD) and training opportunities offered by the council and BHSCP.
8. In line with the Government's Prevent Strategy, on-going work with the Police, Statutory Partners, Third Sector Organisations and Communities to reduce exploitation of young people into extremism.
9. BHSCP continuum of need document, agreed by all agencies, reviewed in 2024.
10. Relationship based model of practice embedded across social work and family help teams to provide stability to service users
11. Adolescent Vulnerability Risk Meetings consider individual cases where it is considered there is a higher risk of exploitation (sexual; criminal and radicalisation).
12. Regular individual and group supervision of cases to ensure effective management of risk within families.

#### Second Line of Defence: Corporate Oversight

1. Family Help Partnership Board provides multi-agency oversight on early help arrangements across the city to support families receiving the right help at the right time
2. Multi agency safeguarding quality assurance processes in place, monitored by the BHSCP Monitoring & Evaluation Subcommittee, meets quarterly
3. Corporate Parenting Board meets quarterly with opportunity for cross-party Members to receive information on children in care and children leaving care. Attended by Heads of Service, Assistant Directors and the Corporate Director FCL
4. 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
5. Council appointed Vulnerability, Violence and Exploitation co-ordinator who reports regularly to the Community Safety Partnership

#### Third Line of Defence Independent Assurance:

Ofsted inspection of children's services arrangements in March 2024 - Outstanding. This provides external assurance on our safeguarding and care arrangements.

Ofsted and the CQC inspection of the council's SEND and Alternative Provision arrangements in March 2023. The council received outcome 1 which provides positive assurance around our social care arrangements for children with special educational needs and disabilities and confirmation that existing improvement plans are correctly focussed.

National Probation Inspectorate statutory inspection of the city's Youth Offending Service April 2021 - Outstanding grading across every domain. Annual Engagement Meeting (AEM) with Ofsted HMI for social care and education. Most recently held in April 2024 and covered social care and education. A separate discussion focussing on Further Education and Skills and one on Special Educational Needs is due to take place later in 2024.

The Brighton & Hove Safeguarding Children's Partnership (BHSCP) commissions Independent Scrutiny (IS) for the partnership to provide external challenge to the businesses of the partnership, its meetings, subgroups and priorities.

Internal audit:

2023/24: Childrens Services Data Handling (Reasonable Assurance), Risk Management Actions: Implementation and Progress Reporting (Substantial Assurance)

2022/23: Home to School Transport (Reasonable Assurance)

2021/22: Child Disability Agency Placements (Reasonable Assurance); School Attendance (Reasonable Assurance).

Risk / Action title	Owner	Action status
Deliver a robust and improving social work and social care service that keeps children safe.	Anna Gianfrancesco	On-track
Support early years and childcare providers, including our nurseries and nursery classes to ensure the best start in life through provide high quality early years services	Jo Templeman	On-track
Ensure that mandatory PREVENT training is embedded in all training induction and development plans within the organisation to support effective identifiers and that the referral pathway is known	Nahida Shaikh	On-track
Provide assurance that there is a comprehensive clear Disclosure and Barring Service (DBS) check and recheck process in place which reduces risk to the organisation and to the community	Jenny Holmes	Monitor
Improve the health and wellbeing of children and young people in Brighton & Hove through the delivery of our Starting Well programmes	Caroline Vass	On-track

Risk Code	Risk Title	Responsible Officer	Initial Risk Score	Target Risk Score
SR18	Failure to invest in and maximise use of digital technology to enable a responsive council with well-run services	Corporate Director Corporate Services	16 L4 x I4	12 L3 x I4
<b>Description</b>				
<p>The organisation is highly dependent on technology for the delivery of services. However, technology requires ongoing financial investment to keep pace with the expectations of staff and customers and avoid technology failures which lead to disruption to services.</p> <p>Investment can be sub-divided into 5 key areas:</p> <ol style="list-style-type: none"> <li>1. Investment in foundational technology: ensuring a reliable and secure infrastructure</li> <li>2. Investment in 'end user' technology: provide appropriate device, corporate systems, and office productivity tools</li> <li>3. Investment in business applications: ensuring service owned systems are fit for purpose</li> <li>4. Investment in digital transformation: enabling modernisation programmes to develop and utilise new digital approaches and technologies</li> <li>5. Investment in leaderships and staff: improving our leaders and staff's tech competencies and ensuring the opportunities provided by technology are recognised and exploited</li> </ol>				
<b>Appetite</b>				Open
<p>The council has an open appetite to risk when investing in and maximizing use of technology.</p> <p>The means the council:</p> <ul style="list-style-type: none"> <li>• sufficiently invests in foundational technology to ensure that the IT infrastructure is robust</li> <li>• ensures staff have the systems and devices to deliver services</li> <li>• is open to investment and use of modern technology to improve customer outcomes</li> <li>• invests in the development of council officers, managers and leaders to maximise the use of technology in the provision of services</li> </ul>				
<b>Causes</b>				

Organisational capacity limits the council's ability to invest resources into exploring opportunities within digital and technology

Services procuring systems do not consider the wider customer or data journey

The adoption of corporate applications is not consistent across the authority (e.g. PowerBI) limiting the efficiency and potential benefits and increasing risks around ongoing maintenance

Outcome of the Orbis review may further impact the council's ability to apply resources to modernisation of digital and technology due to potential costs involved

A lack of corporate ownership to drive the work forward would greatly impact the council's ability to utilise new technologies

### Potential Consequence(s)

#### 1. Investment in foundational technology

BHCC will be more vulnerable to cyber-attack (SR10) as well as regular service outages caused by systems failure. This will result in failure to deliver services, a loss of revenue, an increased risk to residents and a negative impact on staff morale

#### 2. Investment in 'end user' technology

Lack of (or inadequate) end user technology will limit service ability to achieve relevant corporate plan objectives/make the required service improvements. It will also have a negative impact on staff morale and make it more challenging to attract and retain talent due to not meeting expectations of a modern working environment.

#### 3. Investment in business applications

Continuing to run business specific applications which are not fit for purpose will limit service ability to achieve relevant corporate plan objectives. They will also put the organisation at greater risk of cyber-attack (SR10) and raise risks associated with poor information management, accessibility, and interoperability with digital products.

#### 4. Investment in digital transformation

Digital transformation underpins the organisation's ability to deliver value for money services, provide excellent customer service and create organisational agility. Inadequate investment (and investment which is not balanced across the multiple facets of digital - cultural change, process improvement and digital technologies) will lead to a failure to meet these corporate objectives. It will also have a negative impact on staff morale and negatively impact the council's and city's reputation as a digital city.

#### 5. Investment in leadership and staff

Managers and leaders require support to understand the implications of new technologies and how they can be utilised. Staff will need to be supported to become more digitally curious and engaged and have the confidence to adopt new ways of working. Without the investment to support these changes, the value of any investment in technology will be lost.

## Existing Controls

### First Line of Defence: Management Controls

1. Investment in foundational technology
  - a. Planned annual capital investment in foundational IT (a share of £1M split between foundational and end user technology) is managed through a structured capital investment programme Foundational IT (FIT), formally 'Digital Organisation Programme (DOP) with the appropriate programme structures and artifacts and oversight via the Corporate Modernisation Board (CMDB)
  - b. Exceptional capital investment is approved at CMDB and managed alongside planned capital investment.
  - c. Investment programmes to date have delivered multiple new capabilities including - off site, secure Data Centre storage (ODC); Platform migrations (Citrix and Windows10), a GDS (Government Digital Services) security accreditation mail service, ubiquitous wi-fi capabilities across all BHCC offices, and remote working service (AOVPN) for the entire workforce
2. Investment in 'end user' technology
  - a. Planned annual capital investment in 'end user' technology (a share of £1M split between foundational and end user technology) is managed through a structured capital investment programme Foundational IT (FIT), formally 'Digital Organisation Programme (DOP) with the appropriate programme structures and artifacts and oversight via the Corporate Modernisation Board (CMDB)
  - b. Exceptional capital investment is approved at CMDB and managed alongside planned capital investment.
  - c. Investment programmes to date have delivered multiple new capabilities including – the creation of a new mobile service and the introduction of 1800+ iPhones/tablets and the introduction of 3,000 new laptop devices.
3. Investment in business applications
  - a. With oversight from CMDB, investment in the Eclipse programme (£2.8M) to replace the core social work case management system.
  - b. Investment in the replacement of the housing management system.
4. Investment in organisational transformation
  - a. With oversight from CMDB, investment via the Digital Customer programme (£1.7M) has sponsored multiple digital transformation projects including corporate web migration, MyAccount, Customer Index/Viewer project and the Contact Management project
  - b. Ad hoc digital improvements were made as part of the Covid response including the Clinically Extremely vulnerable (CEV) App, Community Hub app, Free school meals app, PPE form, Homeless food delivery, Discretionary grant application, Business grant application, etc
5. Investment in leadership and staff
  - a. Leadership Network is a forum for developing leaders

### Second Line of Defence: Corporate Oversight

1. Corporate Leadership Team (CLT) oversee the alignment of programmes and projects to the Council Plan objectives and review any gaps. This includes the oversight of the Foundational IT programme (FIT), Digital Customer programme and the Future Ways of Working programme
2. CLT have oversight of the biannual staff survey and specifically the relevant indicator 'I have access to the equipment, systems & resources I need to do my job effectively'
3. 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
4. Silversands have provided assurance around Microsoft 365.

#### Third Line of Defence Independent Assurance:

##### Internal Audit:

2023/24: Surveillance Cameras follow up (Reasonable Assurance), Robotic Process Automation (Reasonable Assurance), Advice work for ERP programme board and the housing works management system programme board, PCI/DSS (Partial Assurance)

2022/23: Housing Management System (follow up) (Reasonable Assurance); Public Sector Bodies Accessibility Regulations (follow up) (Reasonable Assurance)

2021/22: MCM Housing Repairs Application (Reasonable Assurance), Public Sector Bodies - Website & Mobile Applications - Accessibility Regulations (Partial Assurance)

Mitigating actions	Owner	Action status
Align the priorities and actions of the Digital, Data and Technology portfolio to support the delivery of the council plan priorities and support in the modernisation of service delivery	Dan Snowdon	Action required
Investment in 'end user' technology - Foundational IT Programme: Strategic Telephony Review	Dan Snowdon	On-track



Risk Code	Risk Title	Responsible Officer	Initial Risk Score	Target Risk Score
SR21	Failure to optimise council housing stock, make best use of available housing in the city and deliver new affordable homes	Corporate Director Housing, Care & Wellbeing	16 L4 x I4	12 L3 x I4
<b>Description</b>				
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.				
<b>Appetite</b>				Minimal
<p>The Council has a minimal appetite for risks that may impact our ability to manage housing pressures and deliver new housing supply.</p> <p>This means the Council:</p> <ul style="list-style-type: none"> <li>• will prioritize resources towards the prevention of homelessness and meeting its housing duty</li> <li>• will accept a moderate level of risk exposure in delivering new housing supply</li> <li>• focuses on compliance with all regulatory and legislative requirements</li> <li>• will consider low risk actions which support delivery of housing priorities and objectives with robust controls, oversight and monitoring arrangements in place</li> </ul>				
<b>Causes</b>				
<ul style="list-style-type: none"> <li>• Scope for development within the city is affected by significant geographical constraints and competing land pressures.</li> <li>• The increasing demand for housing continues to outstrip new supply and as a consequence accommodation is becoming less affordable.</li> <li>• Housing shortages are particularly acute for low income households affecting our ability to retain essential workers in the city.</li> <li>• Demand for affordable rented homes is growing with a significant number of households in temporary accommodation.</li> <li>• The private rented sector continues to expand at the expense of rates of owner occupation which are in long term decline.</li> </ul>				
<b>Potential Consequence(s)</b>				

- Changes in Government legislation require council intervention to prevent homelessness at an earlier stage.
- The city is constrained in its capacity to accommodate economic growth, housing supply obligations and sustainable development objectives.
- 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.
- 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.
- 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.
- 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.
- Housing pressures and inability to access to affordable good quality homes may have varying and disproportionate adverse impacts on different groups and communities.

### Existing Controls

#### First Line of Defence: Management Controls

- The City Plan also sets out housing targets across all tenures; policies on securing affordable housing through the planning system, residential development standards
- Homes for everyone strategy and year one action plan approved at Full Council in October 2024
- Housing Allocation Policy approved at Cabinet in October 2024. The Housing Allocations Policy is the legal framework through which all social housing must be let. It sets out the conditions required to qualify for the housing register, and how applicants are prioritised.
- Homelessness & Rough Sleeping Strategy
- A citywide Additional Licensing Scheme for smaller HMO's introduced in July 2024
- Empty Homes working group
- Homelessness Transformation Programme

#### Second Line of Defence: Corporate Oversight

- Housing Supply Programme Board
- Limited Liability Partnership Board
- Corporate KPI on 'No. of additional affordable homes delivered by the council (new build, acquisitions & conversions)' monitors our effectiveness at increasing affordable homes in the city
- Actions are monitored through the Corporate Leadership Plan to implement the new housing strategy and increase housing supply

#### Third Line of Defence Independent Assurance:

##### 1. Internal Audit:

2023/24: Housing Rents follow up (Partial Assurance), Housing Temporary Accommodation (Reasonable Assurance), Housing Repairs Service follow up (Reasonable Assurance), Housing Allocations (Reasonable Assurance)

2022/23: Housing Management System (follow up) (Reasonable Assurance)

2021/22: Housing Rents (Partial Assurance)

2018/19: Digital First (Minimal Assurance)

2. Department for Levelling Up, Housing and Communities information quarterly returns on homelessness and rough sleeping

3. Homes England (HE) information returns where we have HE grant allocations. HE grant for homeless move on accommodation – regular updates to HE on scheme progress and draw down on grant.

Risk / Action title	Owner	Action status
Build new council homes to meet the number of homes required in the city.	Sam Smith	On-track
Create new social housing lets by reducing under occupancy to make best use of available housing in the city.	Emma Gilbert	On-track
Implement the new Housing Strategy to deliver accessible, affordable and high-quality homes for everyone in Brighton & Hove.	Paul Cooper	On-track
Increase housing supply of new and affordable homes to meet the needs of current and future residents.	Di Hughes	On-track

Risk Code	Risk Title	Responsible Officer	Initial Risk Score	Target Risk Score
SR24	Failure to provide an equitable approach to ensure equality of access, outcomes and experiences for all	Chief Finance Officer	12 L4 x I3	9 L3 x I3
<b>Description</b>				
<p>During the cost of living crisis, there have been continuing implications for demand and staffing levels within services, including advice, welfare support, rent collection; council tax collection, and pressures on social services and homeless services. The voluntary sector is also reporting a high level of strain on their resources. Crucially the Council response was significantly bolstered by the government's HSF/Household support Fund (£4.3m for 2023-24) but we have a high risk of a cliff edge drop in funding, as no further HSF is confirmed for 2024-25. We have received three previous 6 month tranches of HSF, but the amount has been static even while inflation reached double figures and eroded the value to the city. Alongside this, two key mechanisms of direct resident support are now funded by HSF, when they used to be core-funded by the council – the Local Discretionary Social Fund (the help fund itself, alongside some of the staffing costs), and the Discretionary Council Tax Reduction pot, which is used to “top up” residents’ council tax reduction, when they’re struggling. If the HSF is not repeated for 24-25, these functions will either cease or have to be funded another way. A large chunk of HSF also goes towards Free School Meals in the school holidays. And further funds are given to the voluntary sector for fuel support schemes and crisis support directly in the community.</p> <p>The new Cost of Living strategy will help to establish how services will operate to support vulnerable households throughout the winter of 2023/24 and beyond.</p> <p>Against this backdrop, the DWP will finally be implementing managed migration of legacy benefit cases (for example Housing Benefit cases) onto Universal Credit, by the end of 2024/25. There is an uncertainty around this that will add resource pressure to services within the council and out in the voluntary and advice sector.</p>				
<b>Appetite</b>				Cautious

The Council has a cautious appetite for risks that may impact our ability to provide effective welfare support to households in financial hardship

The means the council:

- has clear policies and procedures to ensure residents can access the support required
- will prioritise resources to support the most vulnerable residents across the city
- will work in partnership with key organisations to provide a city-wide response
- will consider all options and accept a level of controlled risk to improve customer outcomes

### Causes

- Inadequate welfare system that does not provide the safety net for all who need it
- Government funding does not reflect the pressures faced by the council and limits ability to support residents to access the benefits they are entitled to
- Breakdown in relationship with key strategic partners across the city leading to misaligned or conflicting objectives and a lack of joined up approach (multiagency response)
- Lack of consultation and engagement with residents limits the council's understanding of the challenges faced and needs of the city's vulnerable residents
- Lack of joined up data between council services
- Housing pressures and inability to access to affordable good quality homes
- Reduction or cessation of funding from Government to provide emergency support

### Potential Consequence(s)

- Increased knock-on service pressures on housing, social services and voluntary sector providers such as food banks and money advice services.
- Increased volume of Council Tax Reduction and Universal Credit claims in response to the Cost of Living crisis.
- Increase of food poverty, fuel poverty, money flow, property rent arrears, and growing Council Tax arrears
- Increased pressure on mortgage payments due to rising interest rates, vs a lack of specialist housing advice in the voluntary sector, and no adequate financial support to cover the rises.
- Significant extra pressure on local discretionary budgets and funds.
- Decreased rent and Council Tax collection.
- Sudden expiry of £4.3m Household Support Fund means -
  - no free school meals in the holidays
  - no LDSF without identifying additional funding (fund is £1.4m, and prior to covid it was £0.180m)
  - no crisis support for those below poverty line
  - a defunding of crisis support and fuel initiatives in the voluntary sector.
- Increased cost and resource burden on statutory services, including Housing/homelessness prevention, FCL and care costs/HASC

### Existing Controls

First Line of Defence: Management Controls

- a) BHCC Local Discretionary Social Fund (LDSF) provides assistance with emergency food vouchers, fuel etc. (currently topped up by Household Support Funding).
- b) Community Hub deals with requests for help from the public. Referral routes now established to welfare rights, money advice, energy works, food banks, etc.
- c) Mature links with Community & Voluntary Sector (CVS) at a strategic and operational level ensure an appropriate city-wide response with additional funding from Household Support Funding.
- d) £4.2m Household Support Fund for specific support providing multi-organisational support for residents from 1 April 2023 to 31 March 2024. The future of the scheme is uncertain as the government has not announced a continuation beyond March 2024. The Autumn Statement may or may not provide clarity on the issue.
- e) The council's welfare support service including Welfare Rights, LDSF, community hub, debt advice, and benefit cap support, will deal with new cases coming in, as per current procedures.
- g) Updated Cost of Living Plan, currently out for consultation until 31 October 2023.
- h) Regular reporting to committee on Cost of Living strategy and response.

#### First Line of Defence: Management Controls

1. Cross service and multi-agency strategic meetings to co-ordinate full range of welfare responses (for example Welfare Support and Financial Assistance meeting, Food Insecurity Group, Mental Health and Debt Steering Group).
2. BHCC Welfare Rights, Welfare Reform and Discretionary Help and Advice teams (Community Hub) monitor welfare changes and coordinate a corporate response to them.
3. Ongoing meetings are held with Department for Works Pensions (DWP) about change to Universal Credit (UC) and how we respond to vulnerability.
3. Council Tax Reduction (CTR) rules can be set and changed by the BHCC. Revised scheme from April 2022 moved to an earnings banding scheme.
4. Provide case-working support directly to customers most significantly affected by the changes, e.g. benefit capped, or contesting a DWP benefit decision, or being given benefit advice and support.
6. Regular links maintained with advice and voluntary sector so impacts on citizens can be judged and assessed.
7. Corporate Debt Policy has now been embedded and is being mainstreamed. As part of this, the welfare support function is linked in to ensure sensitive and ethical debt collection.
8. Various discretionary welfare funding streams are being carefully monitored and adjusted using temporary funding to respond to changes in demand.

#### Second Line of Defence: Corporate Oversight

1. Corporate Leadership Team (CLT) 2. Cabinet 3. Audit, Standards & General Purposes Committee.		
Third Line of Defence Independent Assurance:		
1. Internal Audit: 2023/24: Risk Management Actions: Implementation and Progress Reporting (Substantial Assurance) 2021/22: Welfare Discretionary Funding (Reasonable Assurance), Housing and Council Tax Benefits (Substantial Assurance); Council Tax (Reasonable Assurance). 2. Department for Work & Pensions (DWP) oversee distribution of the Household Support Fund. 3. Department of Levelling Up, Housing & Communities and BEIS oversee the Energy Payment and associated discretionary fund, and Energy Bills Support Scheme respectively.		
Risk / Action title	Owner	Action status
Continually review food insecurity and health implications via the Food Insecurity Group.	Angela Blair	Monitor
Enable cross council and city collaboration to address poverty	Nigel Manvell	On-track
Improve the customer experience and operational efficiency within Council Tax, Housing Benefits and Pension and Payroll Service.	Graham Bourne	Monitor



Risk Code	Risk Title	Responsible Officer	Initial Risk Score	Target Risk Score
SR25	Failure to use the council's resources and capabilities to deliver the Council Plan and adapt to the evolving needs of the city	Chief Executive	25 L5 x I5	20 L4 x I5
<b>Appetite</b>				Open
<p>The council has a 'cautious' to 'open' appetite for risks that may impact our ability to deliver services to our customers, or adversely impact our capability to deliver services. The council is cautious in respect of any risk that may impact its ability to deliver essential services but is more open to risk when exploring innovation and modernisation opportunities.</p> <p>This means the Council:</p> <ul style="list-style-type: none"> <li>• devolves responsibility for non-critical decisions on service delivery within a framework of overall accountability</li> <li>• prioritises resources to the delivery of essential services to protect delivery to our most vulnerable customers with some resources allocated to discretionary services which add value</li> <li>• invests some time and resource to explore opportunities for innovation and modernisation</li> <li>• is open to the use of systems and technology developments to improve service delivery</li> <li>• clearly defines the skills and resources needed to deliver services when planning</li> <li>• supports and promotes personal and professional development of council officers</li> </ul>				
<b>Causes</b>				
<p>The capacity required to deliver services is impacted by a number of internal and external factors which include:</p> <ul style="list-style-type: none"> <li>• Budget pressures caused by reductions in Local Government funding (SR02)</li> <li>• Increasing demand for services across the council and partner organisations; e.g. cost of living, increased stakeholder expectations</li> <li>• The need to adapt to new technologies increases the skills gap for the organisation</li> <li>• Failure to fully realise benefits from digital (SR18)</li> <li>• A challenging industrial relations environment</li> <li>• STAR Chamber Vacancy approval process may result in vacancies taking longer to recruit impacting service capacity</li> <li>• Difficulty of retaining and recruiting the right staff with the right skills to key posts</li> </ul>				
<b>Potential Consequence(s)</b>				

<ul style="list-style-type: none"> <li>• Failure to deliver required changes in the organisation</li> <li>• Negative impact on fulfilment of actions to improve equalities and other statutory duties</li> <li>• Personal resilience tested by increased workloads, different ways of working and less certainty leading to potential stress and sickness</li> <li>• More stressful workloads can lead to people leaving or retiring earlier</li> <li>• Less ability to be agile and flex to the organisation's needs, drive high quality services and increased performance</li> <li>• Less resilience as an organisation</li> </ul>
<b>Existing Controls</b>
<b>First Line of Defence: Management Controls</b>
<ol style="list-style-type: none"> <li>1. Decision making through the budget process includes effective consideration of resources to deliver the Council Plan</li> <li>2. Modernisation funding to increase change capacity</li> <li>3. Management capacity and capability being enhanced by Leadership Performance Management processes and Development Programme, and support delivered via the Leadership Network.</li> <li>4. Staff Survey data is analysed and priority actions agreed with key stakeholders, with plans in place to manage these.</li> <li>5. Business Planning process including Corporate Leadership Plan, and KPIs to identify key priorities with named responsible officers, and plans kept under review to manage capacity.</li> <li>6. HR Business Partners support Directorate Management Teams (DMTS) to monitor people related data including staff absence compliance with people related processes such as 121s, return to work interviews, and wider data insight to indicate where there are issues of capacity.</li> <li>7. A robust wellbeing offer is in place, designed to address all wellbeing needs.</li> <li>8. There is a dedicated role for Trade Unions Relations.</li> </ol>
<b>Second Line of Defence: Corporate Oversight</b>
<ol style="list-style-type: none"> <li>1. Corporate Leadership Team (CLT) oversight of governance arrangements</li> <li>2. CLT and DMT have oversight of a portfolio of modernisation projects and programmes enabling increased organisational capacity such as Digital, Data &amp; Technology, Workstyles, People and Culture Change, including the Our People Promise and Fair and Inclusive Workplace programmes.</li> <li>3. CLT and City Management Board work collaboratively to strengthen partnership working</li> <li>4. Cabinet has oversight of key policy priorities.</li> </ol>
<b>Third Line of Defence Independent Assurance:</b>

1. Local Government Peer Review 2017 focused on Leadership and Industrial Relations. 2. Internal Audit 2023/24: Organisational Capacity – Workforce Strategy and Management (Reasonable Assurance), Performance Development Plans and 1 to 1s (Reasonable Assurance) 2021/22: Agency Staff Contract (Reasonable Assurance) 2020/21: Recruitment (Reasonable Assurance), Working Time Directive (Partial Assurance) 2018/19: Personal Service Companies and Use of Consultants (Reasonable Assurance), Wellbeing Project (Substantial Assurance)		
Risk / Action title	Owner	Action status
Create a council that is equitable, diverse, inclusive and accessible as an employer and service provider, implementing the Fair and Inclusive action plan including embedding the Anti-racism strategy and Accessible City Strategy.	Emma McDermott	On-track
Deliver year 2 priorities for Our People Strategy 2023 – 2027 (included H&S) to ensure the council has the workforce needed to deliver council plan priorities and statutory and essential functions.	Ken Simpson	Monitor
Deliver a culture change programme to align culture with the council's missions and priorities	Lindsey Pearce	On-track
Deliver the phase 2 organisational redesign (action lead Jess Gibbons)	Ken Simpson	On-track

Risk Code	Risk Title	Responsible Officer	Initial Risk Score	Target Risk Score
SR38	Failure to take effective action to increase our city's resilience to climate change, improve biodiversity and transition to net zero	Corporate Director City Services	20 L5 x I4	15 L5 x I3
<b>Causes</b>				
The climate is changing due to man-made greenhouse gas emissions. Climate change will bring costly and potentially catastrophic impacts to Brighton & Hove's infrastructure, communities, economy, natural environment and quality of life over the next decades. The timing and intensity of these risks is unpredictable but inevitable.				
<b>Appetite</b>				Cautious
<p>The council has a cautious appetite for risk when seeking to improve the city's resilience to the impacts of climate change.</p> <p>The means the council:</p> <ul style="list-style-type: none"> <li>• prioritises resources on the effective delivery of high impact action that increases the city's resilience to climate change</li> <li>• focuses on actions that have a greater certainty of positive outcome, particularly those with a significant financial impact</li> <li>• will only accept limited uncertainty in decisions that may have significant impact on the community</li> <li>• is open to exploring all opportunities to increase the city's resilience to climate change that are funded through external sources or partnerships</li> <li>• will accept a moderate level of reputational risk in making decisions if it is better for the community in the long term</li> </ul>				
<b>Causes</b>				
<p>BHCC has declared a climate and biodiversity emergency and has a target for the whole city to reach carbon neutrality by 2030. Not taking effective action towards this target would mean that the council does not play its part in reducing the risk of global warming above 1.5oC and consequent climate change.</p> <p>The climate is changing due to man-made greenhouse gas emissions. Climate change will bring costly and potentially catastrophic impacts to Brighton &amp; Hove's infrastructure, communities, economy, natural environment and quality of life over the next decades. The timing and intensity of these risks is unpredictable but inevitable.</p>				
<b>Potential Consequence(s)</b>				

- Coastal protection assets challenged by sea level rises, affecting seafront
- Risks to infrastructure networks – water, energy, transport, ICT – from flooding, erosion, heatwaves, high winds, and cascading failure
- Water shortage
- Risk to soils including seasonal aridity and waterlogging
- Risks to food safety and food security
- Risks to cultural heritage
- Risks to building fabric especially housing, including higher energy demand
- Risks to businesses and economy from extreme weather events, disruption to supply chains and distribution networks
- Depletion or threat to local species and their natural habitats
- Ocean acidification and sea temperature rises affecting marine ecosystems
- Disproportionate impact upon groups suffering inequality and vulnerable individuals
- Impact on health and wellbeing (mental and physical), and to health and social care delivery
- Inability to manage demand-led service pressures
- Additional costs to council in responding to emergency events; increasing demand for services; disrupted services; damaged infrastructure.
- Errors, inefficiencies and missed opportunities in implementation and delivery of Carbon Neutral Programme.
- Reputational damage to council of not progressing towards its committed target.
- Failure to implement regulatory and legislative changes related to climate action, and exposure to legal challenge
- Difficulty recruiting and retaining suitably experienced and qualified staff
- Brighton & Hove seen as not a good place to invest or work in.
- Reduced ability to be successful in applications for external funding.
- Lack of engagement and resources from major external partners to deliver critical aspects, milestones and projects.
- Higher costs to the council arising from not delivering climate adaptation measures in a timely way.
- Errors, inefficiencies and missed opportunities in implementation and delivery of Carbon Neutral Programme.
- Reputational damage to council of not progressing towards its committed target.
- Failure to implement regulatory and legislative changes related to climate action, and exposure to legal challenge
- Difficulty recruiting and retaining suitably experienced and qualified staff
- Brighton & Hove seen as not a good place to invest or work in.
- Reduced ability to be successful in applications for external funding.
- Lack of engagement and resources from major external partners to deliver critical aspects, milestones and projects.
- Higher costs to the council arising from not delivering climate adaptation measures in a timely way.

### Existing Controls

First Line of Defence: Management Controls

1. Brighton and Hove City Council commissioned a Climate Risk and Vulnerability Assessment, due to report in Autumn 2023, which will set out the impacts of climate change and propose a strategy for greater coordination of actions to increase resilience of the city.
2. Brighton and Hove City Council owns 13,500 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's water supply. A new 100-year City Downland Estate Plan was approved in December 2022, recognising the Estate's ability to:
  - a. Reduce the amount of carbon in the atmosphere and store it,
  - b. Enhance wildlife and their natural habitats,
  - c. Improve health and wellbeing, by providing public access to nature,
  - d. Provide an affordable and sustainable local food supply.
3. Flood and Coastal Erosion risk management – Brighton Marina to River Adur coastal protection scheme undertaken in partnership with the Environment Agency (EA), Brighton and Hove City Council, Adur District Council, Shoreham Port Authority.
4. Brighton and Hove City Council is a member of the Brighton & Hove Food Partnership which set up the Emergency food Network in 2013; a collaboration of food banks and other organisations coming together to share problems, learn lessons, and develop joint solutions to provide access to emergency food for those in need.
5. Brighton and Hove City Council has an Adverse Weather and Health Plan linked to the UK Health Security Agency's Adverse Weather and Health Plan intended to protect the local population from heat or cold-related harm to health.
6. Brighton and Hove City Council's annual winter Highway Maintenance Plan running from November to March to keep the city moving safely during periods of cold weather.
7. Brighton and Hove City Council's Architecture & Design, and Major Projects teams are delivering new development that meets agreed sustainability standards.
8. Brighton and Hove City Council's Tree Planting Strategy 2022-27 sets out the council's ambition to replace and extend the tree cover in Brighton & Hove, whilst diversifying woodlands to ensure the long-term sustainability of the city's tree stock and maximise opportunities to increase biodiversity.
9. Brighton and Hove City Council's programme of s106 works and Community Infrastructure Levy to deliver infrastructure to meet the current and future needs of the city.

#### Second Line of Defence: Corporate Oversight

1. The Cabinet Lead for Transport, Parking & the Public Realm is responsible for the Council's functions relating to highways management, traffic management and transport, parking
2. The Cabinet Lead for Net Zero and Environmental Services is responsible for the Council's functions to waste, parks and open spaces, environmental health, coast protection and trading standards
3. Brighton & Hove is part of The Living Coast UNESCO biosphere designated area with a biosphere management strategy overseen by the Living Coast Biosphere Delivery Board who meet three times per annum. As at Oct 2023 the Board is chaired by Martin Harris, former CEO of Brighton & Hove Buses, the deputy chair is Sean Ashworth of Inshore Fisheries Conservation Authority (IFCA).

#### Third Line of Defence Independent Assurance:

1. Environment Agency (EA) in respect of flooding. 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.

Risk / Action title	Owner	Action status
Enhance and preserve the city's parks, trees and green spaces to keep them safe and attractive for residents and visitors, and increase biodiversity.	Robert Walker	Monitor
Protect properties from surface water flooding.	Nick Bean	On-track
Implement the objectives of the City Downland Estate Plan (CDEP) to protect and enhance the land for future generations.	James Woodward	Monitor
Agree and implement works to protect and restore the city's coastal and seafront infrastructure.	Nick Bean	On-track
Reduce harmful emissions from transport in the city through the Air Quality Action Plan.	Andy Renaut	On-track
Deliver the City Environmental Improvement Programme to develop a sustainable, efficient waste management service with a focus on minimising waste and keeping the city clean and attractive.	Lynsay Cook	On-track

Deliver the Fleet Strategy and fleet replacement plan to end the use of all petrol and diesel vehicles across the council by 2030.	Ian Greene	On-track
Develop a new programme to address the climate and biodiversity emergencies and help the city transition to carbon net zero.	Alice Berry	Monitor
Deliver a Local Transport Plan (LTP) to ensure residents, visitors and businesses are better connected.	Andrew Westwood	Monitor
Deliver the Bus Service Improvement Plan to grow bus usage in the city.	Andrew Westwood	On-track