## **Croydon Council**

09 March 2016

## Appendix 1: Corporate Risk Register

| Risk  | Impact   |  |  |  |  |  |   |  |   |   |
|---|--|--|--|--|--|--|---|--|---|---|
|   | iiipact  | Exec Director  | Existing Controls  | Impact   | L'hood   | Total  | Future Controls   | Impact   | L'hood  | Total   |
| Home Office reduction to grant payable to Croydon Council in future years in respect of support to unaccompanied asylum seekers. The Home Office wrote to the Council after the budget for 2015/16 and was set to reduce the daily rate the Council received for UASC by just under 20%. Based on the numbers of children for 15/16 this would have equated to a loss of funding of just under £4m. Croydon have been treated as a Gateway authority due to the position of the home office in Lunar House. | Financial Impact   | Greenhalgh,<br>Paul<br>People<br>Department  | Review of likely demand for future years  The Council has held meetings with the Immigration Minister and others in the Home Office. On going correspondence, conversations and clarifications with the Home Office taking place   | 5  | 4  | 20   | No further controls identified at this time   | 5  | 4   | 20  |
| Se<br>Co<br>Wi<br>Co<br>20<br>fo<br>lo<br>ha<br>du<br>Lu<br>Ri<br>in  | pekers. The Home Office wrote to the council after the budget for 2015/16 and cas set to reduce the daily rate the council received for UASC by just under 10%. Based on the numbers of children or 15/16 this would have equated to a case of funding of just under £4m. Croydon cave been treated as a Gateway authority use to the position of the home office in unar House. | pekers. The Home Office wrote to the council after the budget for 2015/16 and cas set to reduce the daily rate the council received for UASC by just under 10%. Based on the numbers of children or 15/16 this would have equated to a cass of funding of just under £4m. Croydon cave been treated as a Gateway authority case to the position of the home office in canar House. | People Department  People Department | support to unaccompanied asylum sekers. 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|              | Risk Scen  | ario   |                                    |   | Curi   | rent Risk R | ating |   | Fut    | ure Risk Ra | ating |
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| Risk Ref     | Risk   | Impact   | Exec Director                      | Existing Controls   | Impact | L'hood      | Total | Future Controls   | Impact | L'hood      | Total |
| Meehan, Mark | Lack of supply of temporary accommodation and affordable private and public sector accommodation, increasing use and costs of emergency accommodation and resulting in a budget pressure | Additional cost to General Fund due to increased spending on emergency and temporary accommodation.  Households potentially living in unsuitable accommodation with consequent negative impacts on their health and wellbeing.  Risk of increased of homelessness or risk of breach of statutory obligations regarding use of shared emergency accommodation for more than six weeks.  Potential for legal action against Council and reputational damage.  Greater difficulty in placing tenants within the private rented sector.  Risk of people not moving on from temporary accommodation | Greenhalgh, Paul People Department | Development of Pan London initiative (London Councils) to achieve VFM on nightly B&B rates  Establishment of Homelessness Task Group  Establishment of Service In Year Budget Tracking Board to monitor progress of the in-year spend, working to achieve a balanced budget year end. This includes reviewing the progress and impact of the planned activity to reduce spend and oversee progress on developing and implementing the approach to demand management including an action plan identifying activity to reduce the in year spend, a dashboard which details information on spend and demand and a list of clients including length of provision, cost of provision, date of last review and relevant plans for alternative/different provision.  Monthly temporary accommodation strategy meeting. New Allocations Policy and Tenancy Strategy | 5      | 4           | 20    | Effective Use of Housing Revenue Account to increase supply of new build housing Expanding temporary accommodation programme On going review of use of housing stock to balance out need for longer term tenancies whilst meeting temporary accommodation needs Lobbying Central Government on local housing allowance New housing company being explored for three to four years time (2018) Working up business cases for the procurement of private sector accommodation to reduce reliance on shared B&B accommodation including permitted development properties | 5      | 4           | 20    |

|                    | Risk Scenario  Risk Impact   |  |                   |  | Curi   | ent Risk R | ating |  | Fut    | ure Risk Ra | iting |
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| Risk Ref           | Risk   | Impact   | Exec Director     | Existing Controls  | Impact | L'hood     | Total | Future Controls  | Impact | L'hood      | Total |
| DASHYA0041         | There is a risk that the delivery of Outcomes Based Commissioning could be   | Failure to deliver 10 Year Outcomes Based Commissioning  | Greenhalgh,       | Private landlord Licensing Procurement of temporary accommodation outside of the Borough when appropriate  Develop links with the CCG primary care   | 5      | 4          | 20    | Adult Social Care will   | 5      | 3           | 15    |
| Scanlan,<br>Brenda | disrupted on the grounds of: *Providers are disengaged and reluctant to accept the proposed approach of Outcomes Based Commissioning, *Providers are unable to deliver or respond to Outcomes Based Commissioning, *Providers are unable to manage the transition / minimise the disruption caused by Outcomes Based Commissioning, *A model of system delivery cannot be devised which incorporates a full range of social care providers. *Implementation of Transforming Adult Social Care (TRASC) programme taking longer than anticipated in (3rd quarter 2016) to successfully transfer the contractual obligations to the Accountable Provider Alliance (APA) (Risk updated 1.2.16) | could result in damaged reputation to the council, its partners and service disruption. Services themselves constitute in excess of £170M of which £40M spend focussing on integrated health and social care for the over 65s and involving five Alliance Partners (Accountable Provider Alliance): Age UK Croydon, Croydon Council Adult Social Care, Croydon GPs Group, Croydon Health Services NHS Trust and South London & Maudsley NHS Foundation Trust all of whom will be impacted by phase 3 (implementation) of the programme (April 2016). Risk that commissioners insufficiently work through service delivery and infrastructure changes for services to the under 65 category. (Risk jointly owned with Martin Ellis CCG) | People Department | development strategy  Development of the provider Capability Assessment (Passed capability Phase 1)  Early engagement of providers through 1 to 1 meetings  Early engagement with GP's as providers  OBC project governance, Board and risk management process  Proactive early engagement by Alliance partners with each other. |        |            |       | be Associate Members of the APA from April 2016 to avoid the risk of the APA developing a sense of direction without the engagement of adult social care  CCG working with Croydon CPO  Develop a media handling strategy and communications plan  Development of the implementation approach  Engagement of commissioners from Croydon Council and clinical commissioning group in developing outline business case for contracts together  ICU working through a set of criteria to help the council determine whether adult social care passes readiness test to join the APA contractually in 3rd quarter of 16/17 |        |             |       |

|          | Risk Scenar  | io  |                              |  | Curi   | rent Risk Ra | ating |   | Fut    | ure Risk Ra | ating |
|----------|--|---|------------------------------|--|--------|--------------|-------|---|--------|-------------|-------|
| Risk Ref | Risk   | Impact  | Exec Director                | Existing Controls  | Impact | L'hood       | Total | Future Controls   | Impact | L'hood      | Total |
|          |  |   |                              |  |        |              |       | Investigation of Autumn Budget announcement of 2% Council tax precept available to fund social care from 17/18 plus potential access to increased Better Care Fund Ongoing organisational development of the APA organisation to establish governance standards Phase 1 of collaborative dialogue following issue of memorandum of information Service/strategic commissioning April 2016, two major contracts Test the market if APA fails |        |             |       |
| DEV0003  | There is a risk that the scale of redevelopment anticipated in the borough over the next five years, (including Transport for London capital investment, schools development, public realm improvements plus specific projects such as the Whitgift redevelopment etc.), could have an adverse impact on the borough's highways and transport infrastructure, and existing business base, particularly within the metropolitan centre. | Risk of unacceptable increase in car and public transport journey times. Risk of disruption to visitors, commuters and businesses from roadworks and diversions. Risk of visitors and shoppers being deterred from coming to the town centre. Potential reputational damage for Croydon. Risk of adverse impact on local economy in the short term. (Strategic objective alignment: Growth) | Negrini, Jo Place Department | a) The Croydon Strategic Metropolitan Board (CSMB) has been created and meets bi-monthly. This high level board chaired by the Chief Executive and attended by the relevant parties including the Greater London Authority has oversight of delivery of the Delivery Plan. | 5      | 4            | 20    | Development Company's commercial developments will be co-ordinated with the main regeneration programme Infrastructure study and Section 278 of the Highways Act funding contribution from Westfield development Provide challenge and review at Connected Croydon Board and tributary boards by a senior client.   | 4      | 3           | 12    |

|          | Risk Scenario  Risk Impact |        |               |   | Curr   | ent Risk Ra | ating |                 | Fut    | ure Risk Ra | iting |
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| Risk Ref | Risk                       | Impact | Exec Director | Existing Controls   | Impact | L'hood      | Total | Future Controls | Impact | L'hood      | Total |
|          |                            |        |               | b) CSMB in combination with the other groups listed will manage scheduling of works as well as delivery a joined up messaging / communications campaign to business and residents. c) Several operational Boards meet monthly / bi-monthly including; Managing Infrastructure Delivery and Scheduling Board (MIDAS) North End Improvement Group, Mayor's Regeneration Fund Board and Growth Board. These are officer Boards attended by Croydon Council officers plus Tramlink, Greater London Authority, Transport for London, operational officers from developers etc these groups attempt to co-ordinate delivery of schemes to manage impact on public space inc. highways |        |             |       |                 |        |             |       |

|              | Risk Scenari  | 0  |                              |  | Curr   | ent Risk R | ating |   | Futi   | ure Risk Ra | ting  |
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| Risk Ref     | Risk  | Impact   | Exec Director                | Existing Controls  | Impact | L'hood     | Total | Future Controls   | Impact | L'hood      | Total |
| PEGWS0018    | Increasing cost of residents in emergency accommodation as a result of not being  | High cost to the Council Customer living in not ideal living   | Greenhalgh,                  | f) The Growth Zone proposal approved by BIS proposes a mechanism to resource essential infrastructure in the Growth Zone which will mitigate impact of growth and development in the Metropolitan centre. g) 5 Gate Delivery Plan h) Connected Croydon Programme Board has recently reviewed its governance and programme management arrangements i) Scrutiny committee oversight March 2016 Changes being made in the process with more | 4      | 5          | 20    | Implementing the  | 4      | 5           | 20    |
| Fowler, Mark | accommodation as a result of not being unable to reduce the high numbers in Council bed and breakfast accommodation and families remaining in b&b accommodation for more than 6 weeks | Customer living in not ideal living conditions Unlawful - reputational damage open to ombudsman maladministration claims and compensation payments | Paul<br>People<br>Department | the process with more work being done on preventative measures  Establishment of Homelessness Task Group for additional challenge and oversight of the decision making process from where people enter temporary accommodation to decisions about eligibility for housing support.  Increasing the supply of alternative and moving-on accommodation  Process changes enabling quicker decision making                                   |        |            |       | recommendation made by Consultants imPower and embedding these into the service delivery model Looking at the provision of permanent accommodation in the borough |        |             |       |

|                         | Risk Scel  | nario  |                              |  | Curi   | rent Risk R | ating |   | Fut    | ure Risk Ra | ating |
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| Risk Ref                | Risk   | Impact   | Exec Director                | Existing Controls  | Impact | L'hood      | Total | Future Controls   | Impact | L'hood      | Total |
| PRCES0021 Tate, Stephen | Affordable housing: Challenge to future supply due to: i) changes in housing market resulting in new developments not including housing/affordable housing element ii) reduced levels of affordable housing achieved through planning obligations (such as \$106s and CIL) because of difficulty with viability issues iii) reduced ability to deliver affordable housing through the new Homes & Community Agency Funding and delivery model due to reduced grant funding iv) local market dynamics whereby private sector landowners/developers may follow alternative development uses, e.g., commercial uses or temporary uses | Shortage of affordable housing to meet urgent housing needs and increasing use of temporary accommodation and B&B for homeless households, with negative financial and PR implications; Less mixed tenure schemes due to growing reliance on 100% affordable housing schemes; Difficulties developing new low cost home ownership schemes.  Risk rating updated as impact of housing and planning bill currently unknown | Negrini, Jo Place Department | Actively manage programme - identify works and deal with issues impacting on scheme delivery.  Change in planning conditions increasing the requirement for affordable housing from 15% to 30%  Focus on Croydon LBs own programme  Maintain and strengthen partnership arrangements with registered providers.  E.g. through one to one meetings and new strategic working group.  Prioritisation of sites to focus work on those providing greatest mixed tenure with affordable housing output.  Proactive approach to site development, engaging registered providers, owners, developers etc  Registered providers of social housing able to bid for sites  Submit or support bids for new funding to support additional affordable housing e.g. Mayor's Housing Covenant | 5      | 4           | 20    | Council new build programme: liaison with Steve Wingrave over new sites  Develop a Council-wide Compulsory Purchase Order (CPO) Strategy to consider the use of CPO powers through planning/ regeneration, to support priority areas and schemes. Identify sites with timescales then securing planning and finding to obtain them.  Develop proposals for a site acquisition and capital funding programme - enable a number of stalled sites to come forward for affordable housing through Housing investment fund.  Embed restructured HD&R team  Engage more closely with land owners/developers and map the ownerships of sites in key areas  Explore links between affordable rent and PRS models to enable developments to come forward  Housing delivery paper to address and endorse delivery plan with developers. | 4      | 4           | 16    |

|          | Risk Scenari | 0      |               |                   | Curr   | ent Risk Ra | ating |  | Futi   | ıre Risk Ra | iting |
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| Risk Ref | Risk         | Impact | Exec Director | Existing Controls | Impact | L'hood      | Total | Future Controls  | Impact | L'hood      | Total |
|          |              |        |               |                   |        |             |       | Proposed setup of Croydon LB housing company to operate outside borrowing restrictions of HRA Robustly enforce minimum affordable housing requirement on s106 sites in line with Core Strategy Submit or support bids for new funding to support additional affordable housing e.g. Mayor's Housing Covenant Work closely with Development Management to achieve planning milestones to enable schemes to go ahead before 2015 |        |             |       |

|                          | Risk Scen   | ario  |                              |   | Curi   | rent Risk R | ating |   | Fut    | ure Risk R | ating |
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| Risk Ref                 | Risk  | Impact  | Exec Director                | Existing Controls   | Impact | L'hood      | Total | Future Controls   | Impact | L'hood     | Total |
| PRCES0058  Tate, Stephen | The 30 year business plan of the Housing Revenue Account had previously factored in an assumed increase in rents (equal to increases in the consumer price index +1%). Investment plans for repairs, maintenance and new home building were based on this assumed increase in income. Government policy now requires social landlords to commit to decreasing rent by 1% from 16/17 over four years. Secondly 'Pay to Stay' policy means social housing tenants with household incomes over £40,000 will have to pay a market or near market level of rent from April 2017 to fund central government deficit reduction and this will have to be administered by HRA with potential impact on tenancies. Thirdly higher value council owned properties including new build homes may have to be sold off to fund the extension to Right to Buy for other social landlords creating further uncertainty. Lastly the cap on housing benefit for social tenants to align with local housing allowance may also have a knock on effect for the HRA.  Risk that council does not successfully balance the competing demands for repairs, maintenance, general housing management and new home building and that the current HRA arrangements become unsustainable. | Investment plans for repairs, maintenance, general housing management and new home building will need to be reviewed and reprioritised in the light of this decreased income together with the investigation of other potential efficiency savings. | Negrini, Jo Place Department | ongoing discussions regarding the prioritisation of repairs, maintenance, general housing management and new build schemes. | 5      | 4           | 20    | a review of current expenditure commitments and investigation of efficiency savings that can be identified within the HRA, together with an assessment of the impact of different options to ensure tenants' interests are protected. | 5      | 4          | 20    |

|                                   | Risk Scena  | ario  |                                     |  | Curi   | rent Risk R | ating |  | Fut    | ture Risk R | ating |
|-----------------------------------|---|---|-------------------------------------|--|--------|-------------|-------|--|--------|-------------|-------|
| Risk Ref                          | Risk  | Impact  | Exec Director                       | Existing Controls  | Impact | L'hood      | Total | Future Controls  | Impact | L'hood      | Total |
| RCSCFS0001<br>Simpson,<br>Richard | The Council faces continued significant reductions in its grant funding, over the period 2016 to 2020 further confirmed by the Spending Review in November 2015. This is at the same time as significantly rising demand for services and growth in population.  Risk that demand/budget gap is not bridged without the need for cuts to services.                                    | Insufficient resources may lead to inability to meet community needs and political aspirations. Potential inability to meet statutory responsibilities in times of increasing demand through changing demographics, for example mental health services, older people's services and deprivation of liberty demands. Damage to reputation and service. Reduction in resources Increasing demands for services and support, for example the Council Tax support scheme arrangements Risk of failure to balance Budget and Failure to maintain capital investment strategy in infrastructure (Strategic objective alignment: Enabling) | Elvery, Nathan Resources Department | a) The Council has a track record of delivering significant savings since 2010 (£100m) b) Croydon Challenge Programme in place and being delivered c) Quarterly monitoring of in year financial performance to Corporate Leadership Team and Cabinet e) Savings for 17/18 signed off by Cabinet as part of 2016/17 budget setting report. Gap of only £15m for 17/19. f) New Corporate Plan aligned to Ambitious for Croydon to ensure priorities align with resources | 5      | 4           | 20    | Further work on 17/19 savings options as part of Croydon Challenge work with CLT and Cabinet Input to government review as part of 100% business rates retention and fair funding review to ensure needs analysis part of the formula reflects the pressures faced by Croydon. | 5      | 3           | 15    |
| RCSCFS0080<br>Simpson,<br>Richard | The Council being able to contain its 16/17 spending within the funding envelope. This particularly applies to the People Department being able to contain its in year spending within the funding envelope, and maintain capacity on the face of growing demand with pressures particularly in Looked After Children, SEN Transport, Adult Care Packages and Temporary Accommodation | Reduction in reserves, reputational damage, impact to residents and services leading to safeguarding issues.  | Elvery, Nathan Resources Department | a) Further on going measures include: i. Acceleration of review of top 50 families in People department as part of the gateway services project to report opportunities for cost reduction . ii. Increased care placement controls and challenge in adult social care iii. Monthly Governance Boards iv. Adult Social Care Transformation programme  | 5      | 4           | 20    | a) Continuous review of services being monitored on a risk based approach.   | 5      | 3           | 15    |

|          | Risk Scenar | io     |               |  | Curr   | ent Risk Ra | ating |  | Fut    | ure Risk Ra | iting |
|----------|-------------|--------|---------------|--|--------|-------------|-------|--|--------|-------------|-------|
| Risk Ref | Risk        | Impact | Exec Director | Existing Controls  | Impact | L'hood      | Total | Future Controls  | Impact | L'hood      | Total |
|          |             |        |               | b) Quarterly monitoring of in year financial performance to CLT and Cabinet with monthly monitoring of high risks/high prone areas. c) Croydon challenge programme - engagement has begun with all staff on outcomes and benefits. d) New Corporate Plan aligned to Ambitious for Croydon to ensure priorities align with resources. e) External view by council auditors, of the Council's financial position and approach f) The Council has a track record of delivering significant saving since 2010 £100m. |        |             |       | b) Increased focus by the Peoples Department on governance for the four demand led areas (Looked After Children, SEN Transport, Housing & Adults Social Care) being strengthened. Including:  - Strengthening challenge on individual case decision-making - Ensuring that monthly meetings between accountants and budget holders take place consistently - Introducing monthly Service Boards for LAC, SEN Transport, Housing & Adults Social Care which will be Chaired by the Executive Director, People - Weekly review of progress / actions at Corporate ELT - Monthly reporting to DLT as part of the monthly budget review - Development of a monthly Members Board which will oversee progress |        |             |       |