

Appendix 1: Corporate Risk Register

	Risk Scenario				Current				Future Risk Rating		
Risk Ref	Risk	Impact	Exec Director	Existing Controls	Impact	L'hood	Total	Future Controls	Impact	L'hood	Total
EHCSC0001 Pendry, Nick	<p>The number of unaccompanied asylum seeking children looked after by Croydon remains significantly higher than the national average. LB Croydon plays a key role in supporting the National Transfer Scheme, a voluntary arrangement between local authorities to disperse and settle children and young people across the UK. This scheme has not had the anticipated success. The Pan London Protocol is in operation. London authorities have co-operated over many years to support each other (although primarily Croydon) by voluntarily taking new presentations of 16 and 17 year old UASCs on a rota basis with an agreed threshold of 0.07%. Those authorities that have been above the 0.07% threshold have come off the rota. They do come back on when young people become 18 and they fall back beneath the threshold. However, the numbers have risen in the past year and the capacity has reduced across London. One authority has recently removed themselves from the rota.</p> <p>On the basis of the average number moved through the rota last year and the new capacity, we calculate it is very possible that the Rota will be full within the next few weeks. Croydon would then be responsible for all new presentations to Lunar House as a locally based service.</p> <ul style="list-style-type: none"> - This would mean an average additional intake of 38 young people per month (based on Jan-Dec 2018 figures). - This is on top of the under 16s already accommodated by Croydon who are made subject to the NTS. - The number of UASC in Croydon's care is likely to rise significantly with a direct impact on Croydon's services generally 	<ul style="list-style-type: none"> - Significant service and staff resources pressures, with pressures on placement supply in-house and in the independent sector, and pressures on school places and LAC health services. - Impact on Council revenue budgets as a result of insufficient funding, especially as the Home Office have failed to increase the funding rates for 19/20. 	Henderson, Robert Children Families & Education Services	<p>Continued work with the Association of London Directors of Children's Services and the Department for Education and Home Office to collectively support the National Transfer Scheme and the work of the Pan London Protocol.</p> <p>Continued work with the Home Office to ensure that only appropriate young people are placed.</p> <p>Emphasis on wider negotiation of fair funding arrangements for Croydon.</p> <p>Establishment of a new Age Assessment Team, supported by the Controlling Migration Fund to fast track all age disputed cases.</p> <p>Financial implication / impact for 2019/20 financial year on going scoping of financial risk / impact for each quarter.</p> <p>Implementation of the National Transfer Scheme.</p> <p>Increased use of the rota to place young people in other boroughs.</p>	5	5	25	<p>Further engagement with Home office and Association of Directors of Children Social Services.</p> <p>Ongoing work to ensure compliance and ensure opportunities are utilised through a formal system for dispersing unaccompanied child migrants as introduced by central government.</p>	5	4	20

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	and Children's services in particular and further budget pressures resulting. - The relevant parts of the Immigration Act have not been enacted by Central Government.			Placement sufficiency. The Council has held meetings with the Immigration Minister and others in Home Office. Ongoing correspondence, conversations and clarifications with Home Office taking place, but response is very slow.							

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ASC0001 McPartland, Annette	<p>Social Care market supply disruption leading to market failure and inability to fulfil statutory requirements.</p> <p>Situation nationally has deteriorated so likelihood is very high. Market failure has become more common, increased by 82% nationally.</p> <p>Risk is jointly owned with Commissioning & Procurement (Jenny Beasley)</p>	<ul style="list-style-type: none"> - Reduction in choice. - Failure to meet service user needs. - Delayed discharge from hospital. - Increase budget pressure. - Reduced quality of provision. - Increase in safeguarding concerns. - Increase number of providers within the provider concerns process. - Increases in delays or overpayments to providers. - Increase pressure on all internal services. 	Van Dichele, Guy Health, Wellbeing & Adult Services	a. 2017/18 internal audit findings completed & implemented. b. Brokerage and Placements Quality Assurance. c. Inflation strategy in place to manage fees paid. d. Integrated Framework Agreement extension. e. Pan London provider concern's process managed by safeguarding team. f. Market management by Contract monitoring team. g. ADASS Pan London minimum standards programme adopted. h. One Croydon Alliance Commissioning strategy ongoing implementation. i. Right Cost of Care exercise by KPMG. j. Croydon Dynamic Purchasing and e-market system commissioned September 2018.	5	4	20	a. A joint micro commissioning and market management process for all Alliance partners. b. Refreshed Market position statement. c. Restructured contract & market management function with increased number of monitors. d. Bring Services 'in-house' where appropriate. (enhance on case by case basis / review and ensure compatibility) e. Creation of more 'Supported Living' capacity. f. PFI Homes Project to be reviewed. g. Reablement in South of borough - Review ability for provision within area. h. Special sheltered housing review / investigation.	5	3	15

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EHCSC0007 Pendry, Nick	<p>Dependency in Children's services on interim resources and challenges of recruiting (particularly in Care Planning & Assessment Team) coupled with significant capacity and resourcing pressures and impact of service reorganisations results in lack of stable, high performing workforce.</p> <p>42% vacancy level -- (28/02/2019 – this includes an adjustment to the establishment which is ensuring lower caseloads).</p> <p>**It must be noted that the vacancy rate is increasing as the size of the teams have increased since Ofsted inspection in order to reduce caseloads and other pressures on Social Work staff.** The reduction of caseloads and the injection of branding 'Croydon as a social care employer'.</p> <p>This is linked to risk ref: EHCSC0012</p>	<ul style="list-style-type: none"> - Managers and staff working excessive hours / holding excessive caseloads.. - Loss of key members of staff and inability to recruit and retain good quality candidates for vacant posts and reduce reliance on agency personnel. - Poor decision making, performance and inability to deliver service transformation. 	Henderson, Robert Children Families & Education Services	<p>Exit interview process has been reviewed and is now structured to includes Director involvement and the ability to identify crucial management information / data to mitigate high attrition rates.</p> <p>Further progress has been made in the conversion of locums to permanent staff - as at 12 March 2019, 18 locum staff had converted to permanently employed status.</p> <p>Recruiting to vacancies: a detailed monthly analysis is identified by a workforce report. Recruitment campaigns are targeted to teams which identify unfilled vacancies and agency workers. Roles are advertised via Community Care which has a readership of social care professionals. In addition Croydon is holding a series of 'Excellence in Practice' recruitment seminars. – latest event held 29/03/2019.</p>	5	4	20	<p>Implement recruitment and retention policy: implementation of the recruitment & retention policy is underway which includes learning and development career pathways, retention payment for Social Workers in hard to fill teams with payment in 2 instalments. There is a strategic approach to recruitment & retention which including benchmarking against other Local authorities, analysing exit interview data as well as monitoring sickness absence and 1:1 supervisions.</p> <p>New co-hort of newly qualified Social Workers to start in May 2019.</p> <p>Reviewing benchmarking and 'welcome payment' for Care Planning & Assessment Teams.</p> <p>Work with HR to promote more strategic approach to recruitment Croydon experience significant difficulties recruiting and competing in London</p>	5	3	15

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EHCSC0010 Pendry, Nick	<p>Risk of exploitation of young people in the Borough particularly in relation to peer on peer and gang activities and children missing from home and care.</p> <p>(Risk reviewed, amended and accepted DMT 14/03/2019).</p> <p>**It is recognised that the enforcement notice (and subsequent implications) issued by Information Commissioners Office towards the Metropolitan Police Service in respect of data sharing / gangs matrix is significant in its implications on the Services ability to deliver protection strategies etc.**</p>	<ul style="list-style-type: none"> - Children feeling and being unsafe/becoming victims or perpetrators of crime - Significant risk of harm to young people in the Borough through exploitation (sexual and criminal), being missing and/or trafficked or caught up in crime - Risk of harm to Croydon children placed away from Croydon without prevention, disruption and protection activity. 	Henderson, Robert Children Families & Education Services	<ul style="list-style-type: none"> a. Choose Life campaign. b. Partnership working with the police and other agencies c. Strategy meetings for children who are missing weekly high risk missing meetings, strategic monthly missing panel. Child Exploitation risk assessment and risk management meetings introduced with MACE (multi agency exploitation panel). d. Focused work with our schools around gangs and County Lines. e. Investment in a data analyst to understand the underlying issues and themes emerging so targeted preventative working can be developed. Analyst liaises with police and gangs analysts. f. Investment made in expanding the team to complete return home interviews. g. Much improved single performance and data report available now. 	5	4	20	<ul style="list-style-type: none"> a. Greater awareness and robust actions by all partners. b. Panel realignment in consultation so children are only discussed in one forum. This will report into new Vulnerable Adolescent workstream. c. Creation of Violence Reduction Unit / Joint accountability with Community Safety. c. Robust and reliable data as well as children's feedback to be analysed on a regular basis (to include: increase in Return Home Interviews, less repeat missing children, realistic National Referral Mechanism (NRM) referral rate, realistic number of children tracked at risk of criminal and sexual exploitation and risks reducing). d. Work with other local authorities to reduce placements of vulnerable children in Croydon. e. Working with the Head of Service responsible for Community Safety to review overall strategy 	5	3	15

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				<p>h. Recently established an adolescent service within Children's Social Care incorporating the Working Gangs Team, Youth Offending Team and the Child Exploitation Team, along with two statutory social care teams for adolescents.</p>				<p>f. Implementation of the 'Glasgow Public Health' approach to managing violence.</p> <p>g. The mayor's violence reduction unit expected to deliver further targeted services in this area.</p>			

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EHCSC0012 Pendry, Nick	The pace of change to achieve the improvement plan outcomes and the journey to a rating of 'Good' is too slow or not achieved, following the OFSTED inspection of 'Services for children in need of help and protection and children looked after and care leavers' which judged the Council's Children's Services as 'inadequate'.	<ul style="list-style-type: none"> - Reputational damage, which has a severe impact on the Council's ability to recruit and retain high quality, skilled staff - Children and young people at risk of significant and serious harm, because children in need of help and protection and children looked after by the Local Authority do not have sufficiently robust care plans and services to meet their needs and keep them safe. - Financial cost of implementing wide ranging changes - Increased referrals to children's social care from across partners, leading to unacceptably high workloads, poor service and associated financial pressures. - Media scrutiny. - Political scrutiny and activity. 	Henderson, Robert Children Families & Education Services	<p>Additional investment of £12m in the base budget will resource business support, learning and development and performance management, which create the conditions for good social work to flourish.</p> <p>Improved leadership and management is being supported and challenged through systemic training for managers at all levels to ensure all have the skills, knowledge and ability to support and develop our staff group, commencing April 2019.</p> <p>In February 2019 inspectors reported that services for children in Croydon continue to improve and many now receive a service that meets their needs. However variability remains, and some children and families continue to receive a very poor service. The pace of improvement needs to accelerate now to ensure every child and family gets a good service.</p>	5	4	20	<p>Locality based working will bring services together around families and communities to make sure families get the right services at the right time. Strengthened relationships will be built across children's services and schools, early years and voluntary sector providers to keep the journey of the child at the centre. Early help will continue to provide robust, effective support for families, expanding the offer so more cases step down from statutory services.</p> <p>The service has been assessed as ready for Frontline social workers to be placed in Croydon from September, reducing the numbers of locum staff and bringing high quality new staff to the borough. A First line cohort of team managers will be recruited to join at the same time.</p>	5	3	15

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				<p>Substantial service improvement to better meet needs is underway including an edge of care service, the realignment of care planning to create a specialist court work teams, a brief intervention approach to working with children in need and putting in place an early help offer for older children.</p> <p>The permanent Executive Director Children, Families and Education and Director of Early Help and Children's Social Care have quickly analysed and evaluated strengths and weaknesses, and translated these into a coherent set of sequenced priorities for action.</p>							

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EYE0003 Davies, Shelley	As at the end of Qtr 3 (2018/19), there are 13 of our 52 maintained schools in deficit. Two of the schools are also in a loan arrangement with the LA. . The risk is that of default or increase in arrears. The total deficit amounts to £4.5m.	- Financial loss to LBC.	Henderson, Robert Children Families & Education Services	Deficit schools are required to report monthly. Schools are met with by senior finance and education officers to discuss their deficit and their action plan for setting a balanced budget in the future. Schools are requested to set a licence deficit plan – this includes a 3 year budget plan as to how the school will return to a balanced position. Termly meetings with 3 schools with highest levels of debt. We have input into the school's 3 year business plan to shape repayment terms and included a formal letter of agreement. • Termly finance meetings for all maintained schools sharing best practice etc.	4	5	20	More enhanced benchmarking using tools currently under development with the DfE.	4	5	20

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EYE0009 Davies, Shelley	Increasing population with complex learning needs and parental expectations leads to rising demand and financial pressure on SEN fixed budgets including pressure on High Needs DSG budget. There is currently a £4.5m budget pressure and a cumulative £13m deficit.	- Children and families do not receive the advice and support they would expect. - Increased costs due to tribunals and complaints leading to reduced reputation. - Inability to achieve outcomes for children and families in Croydon.	Henderson, Robert Children Families & Education Services	Further senior management review of existing plans. High Needs Funding Review planned. Implement strategies for managing demand for more effective mainstream school placements. Implementation of SL DPS to reduce placement costs. Improved forecasting and reporting of demand led spend to manage overall budget position. Improved projections for school places. Modelling of Locality Based Working & Staged Approach supporting mainstream schools meeting SEN needs. More support in mainstream schools planned. New SEN strategy 2019 / 22 present to cabinet March 2019 following consultation. Plans to improve impact of service and measure to mitigate against cost.	5	4	20	0-25 SEND Strategy Implementation Plan to deliver change across the system – in five areas below. The SEND Strategy implementation plan Governance is through SEND Working Group; which reports into Children & Families Partnership Board. Early Identification and Intervention –improved HV assessment, identify needs, work with families early. Support for EY education providers, personalised inclusion funding until the end of EY Foundation Stage. Graduated response – right support, right time. Meeting needs locally in local schools at SEN Support level; reduced reliance on alternative education. Joint Working – children's needs are met locally in Croydon (cost avoidance in imm sector), through co-ordinated and coherent pathways which are achieved through collaborative work with parents and YP; across education, health and care.	5	2	10

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				Provision of more Post 16 specialist placements in borough by Sept 2019 with a further 244 school placements to come on stream by Sept 2020.				Post 16 pathway development so that there are effective local education, care and health pathways to adulthood, and EHC Plans are ceased in timely way (currently 40% HNB spend is post 16). South London Partnership SEN Commissioning Programme for commissioning residential and day placements for children and young people with Special Education Needs. Workforce development – practitioners have the skills and knowledge to meet needs locally. Parents are confident.			

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FIR0018 Taylor, Lisa	<p>The 2019/20 budget is not managed within allocated resources resulting in an overspend and therefore the need to implement additional cuts to services. Funding reductions are imposed whilst the Council experiences a continuous rising demand for service provision and growth in population. The continuing improvement of Children's Services following the OFSTED inspection (June / July 2017) has required greater investment in this service with over £10m having been invested in Children's Services during 2018/19. A further £12m investment has been agreed in the 2019/20 budget.</p> <p>Quarter 3 (2018/19) year-end forecast overspend is £5.466m. This includes £2.66m of costs relating to UASC, which the Home Office are still not engaging with Croydon to resolve. Costs could increase further if demand rises above expected volumes. Overspends will need to be funded from reserves at year end.</p>	<ul style="list-style-type: none"> - Insufficient resources may lead to inability to meet 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, children's services and housing. - Damage to reputation and service risk. - Reduction in resources. - Erosion of reserves. - Risk of failure to balance Budget and failure to maintain capital investment strategy in infrastructure (Strategic objective alignment: Enabling). 	Harris-Baker, Jacqueline Resources Department / Corporate	<ul style="list-style-type: none"> a. Corporate Plan aligned to MTFS to ensure priorities align with resources b. MTFS 2018/22 presented to cabinet (September 2018), setting out future budget requirements. c. Quarterly financial monitoring with additional controls in respect of Adult and Children Social care, where the high risk areas are monitored monthly. d. Regular monitoring of all reserves including Transformation Projects for both service delivery and financial savings. e. Immediate response to national consultations / questionnaires in conjunction with continued lobbying of central government. f. Implementation of the Gateway North Project g. Continued implementation of the Children's Improvement Plan. 	5	4	20	<ul style="list-style-type: none"> a. Continue to implement all Savings & Transformation projects to ensure delivery. b. Close collaborative working with CLT / ELT and Cabinet on savings options for both the current year and future years. c. Focus on preventative measures and early intervention particularly with identified top high cost families, including the Gateway North project model benefits (continuous review). d. Children's Social Care - continued implementation of The Improvement Plan. e. Adult Social Care - review of service delivery and review of all contracts. This includes charging for services. f. Regular review and refresh of MTFS including review of all fees and charges. g. Continued active engagement in fair funding review. h. Continued Home Office lobbying for fair UASC funding. 	5	3	15

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				<p>h. SEN Transport - Continued development of the service operating model to drive efficiencies. This includes the continued use of independent travel.</p> <p>i. Development of a 5 year financial model to continue to manage SEN Transport costs.</p> <p>j. Continued delivery of Gateway & Family Link Service.</p>				<p>i. Investigation / development of the Gateway North Project & Family Link Service.</p>			

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RCS0018 Negrini, Jo	<p>The Council's ability to deliver services (including all statutory requirements) are adversely / critically affected following the departure from the European Union by the United Kingdom.</p> <p>**The United Kingdom's EU referendum (23/06/2016) resulted in the decision for the UK to exit membership from the EU. Article 50 (Treaty of Lisbon) was triggered by the UK Government on 29/03/2017 formalising the process for exit negotiations for the UK with the remaining EU member countries, Parliament has passed legislation confirming EU Exit day as 29 March 2019. On 20/03/2019 the Prime Minister has requested an extension to Article 50 with a new departure date of 30/06/2019 - no approval received as yet from the 27 member states**.</p> <p>This risk is closely monitored in terms of impact however the outcome of the parliamentary process / details of the UK exit conditions cannot be determined at an organisational level. The Council will continue to react to the issues arising as a result of the status of the ongoing negotiations.</p>	<ul style="list-style-type: none"> - Uncertainties about the residency rights of current EU citizens in Croydon could cause community tensions and heightened tensions. - Wider uncertainties about the UK's economy and trade arrangements could potentially impact development plans and inward investment that are vital for the borough's regeneration. - The Council has received funding for a number of initiatives from the EU with some of these part way through delivery. There is uncertainty about future funding and the availability of funds projects. - The UK Economic performance will impact local authority budgets and grants. Currently there are unknowns about whether further grant cuts will be imposed and how Croydon's budget may be affected. - Croydon's business rates income could be impacted by any loss of confidence in investment in the UK economy. - A 'No-deal' Brexit has a high likelihood of causing disruption to supply chain with delays and additional processes at ports in the UK and EU. This may cause shortages in supplies, including critical areas such as medicines, food and fuel. 	Negrini, Jo Corporate Risk	<p>A report has been provided to Cabinet outlining the various implications and actions arising from a No Deal Brexit.</p> <p>An SRO has been appointed and has established a multi-service Brexit Working Group to coordinate the Council's response. This includes the sharing of information / intel, identification of risks and impact, scenario planning, communications and a corporate action plan. This work is being coordinated with partners.</p> <p>Cabinet have endorsed a statement to say that Croydon values and welcomes EU citizens and is open for business and plans are in place to safeguard our growth.</p> <p>Croydon Council Brexit group established and active and engaging with London Councils</p> <p>Croydon is working together with its partners to be vigilant to identify any hate crime and take vigorous action against perpetrators.</p>	5	4	20	<p>In respect of EU regulations, the Council will monitor legislative and regulatory changes and respond in the appropriate time and keep abreast of responses by providers in EU markets.</p> <p>London Councils has called for the Mayor and London boroughs to work closely together to sustain growth and the success of London post referendum and explore the opportunities presented by devolution of powers and finance.</p> <p>The Council will continue to monitor pension fund investments, consider options and viability as volatility levels and markets change</p> <p>The Council will continue working with developers and investors to encourage and enable suitable projects within the borough</p>	5	3	15

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				<p>In respect of the Council's Pension Fund, Croydon is assessing the risk of the investment environment having changed, checking whether the investment vehicles will work after the UK leaves the EU, assessing how the Council can access more attractive regions and investment opportunities, monitoring changes for the investment regulations for the LGPS and reviewing the Treasury Management policy and the level of risk the Council is prepared to accept in view of the UK's credit rating.</p> <p>The Council is working together with its partners to be vigilant to identify any hate crime and take vigorous action against perpetrators.</p> <p>We are coordinating our lobbying and issues monitoring through London Council's.</p>							