

## Corporate Risk Register

Risk Ref	Risk Scenario		Exec Director	Existing Controls	Current			Future Controls	Future Risk Rating		
	Risk	Impact			Impact	L'hood	Total		Impact	L'hood	Total
EHSC0001  Pendry, Nick	<p>The number of unaccompanied asylum seeking children and care leavers looked after by Croydon remains significantly higher than the national average, leading to substantial financial pressure on the Council.</p> <p><b>**The voluntary structure of the scheme means there is always vulnerability. Croydon is responsible for all new presentations to Lunar House as a locally based service**.</b></p>	<ul style="list-style-type: none"> <li>Significant service and staff resources pressures, with pressures on placement supply of in-house and independent foster carers, and pressures on school places and LAC health services.</li> <li>Impact on Council revenue budgets as a result of insufficient funding for overhead costs due to volume.</li> <li>National Transfer Scheme (NTS) continues to fail.</li> <li>Dedicated teams required to deal with large numbers of UASC meaning that the processing of UASC cannot be absorbed into the existing staffing structure like in other Council's.</li> <li>Additional overheads including staff management and legal costs not paid for by Government grants like other Council's e.g. Kent.</li> </ul>	<p>Jones, Debbie</p> <p>Children Families &amp; Education Services</p>	<p>2020/21 Budget assumption of £9m incorporated into current financial year.</p> <p>Additional Home Office funding of £4m for 2020/21 has been agreed.</p> <p>Age Assessment Team, supported by the Controlling Migration Fund to fast track all age disputed cases.</p> <p>Continued use of the rota to place young people in other boroughs through the Pan-London Protocol.</p> <p>Emphasis on wider negotiation of fair funding arrangements for Croydon.</p> <p>Ensuring compliance and ensure opportunities are utilised through a formal system for dispersing unaccompanied child migrants as introduced by central government.</p> <p>Implementation of the National Transfer Scheme.</p>	5	5	25	<p>Complete a forensic review of income against the total expenditure for unaccompanied asylum seeking children and care leavers over the past 3 years.</p> <p>Negotiate with the Home Office and Department for Education to secure agreement to the support currently provided to other port of entry authorities.</p> <p>Negotiation / lobby of MHCLG to continue as part of the capitalisation negotiation, in order to resolve the UASC pressure.</p> <p>Present options for decision to elected members to meet the needs of children within the grant funding available.</p> <p>Support young people with appeal rights exhausted to plan for their futures removing the automatic support to all young people until age 25.</p>	5	4	20

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				<p>The Council continues to hold meetings with the Immigration Minister and others in Home Office. Ongoing correspondence, conversations and clarifications with Home Office taking place.</p> <p>Working with London Council's and the LGA to raise awareness of the specific UASC pressures facing 'Port of Entry' locations (such as Lunar House).</p> <p>Working with the Association of London Directors of Children's Services, the Department for Education and Home Office to implement the voluntary National Transfer Scheme.</p> <p>Working with the Home Office to ensure that only appropriate young people are placed.</p>				Work with London local authorities to secure practical support to share the disproportionate burden on Croydon.			

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ELT0005  Kerswell, Katherine	<p>The Council does not agree and deliver a balanced 2020/21 budget following the issuing of the s.114 notice leading to the Ministry of Housing, Communities &amp; Local Government (MHCLG) imposing additional restrictions.</p> <p>Grant Thornton - 'Report in the Public Interest' recommendation number(s): 12, 16, 19.</p>	<ul style="list-style-type: none"> <li>• Damage to reputation and service delivery risk.</li> <li>• Reduction in financial resources.</li> <li>• Continuing erosion of reserves.</li> <li>• Insufficient resources will lead to inability to meet statutory obligations and political aspirations.</li> <li>• Bankruptcy.</li> <li>• Government commissioners brought in to run Council.</li> <li>• All services immediately ceased (except where statutory duty).</li> <li>• Political scrutiny and interest at local and national level.</li> <li>• Media interest at local and national level.</li> <li>• Increasing financial loss.</li> <li>• Legislative action.</li> <li>• Loss of staff and significant redundancies.</li> <li>• Recommendations from the Report in the Public Interests (RIPI) are not actioned.</li> </ul>	<p>Kerswell, Katherine</p> <p>Executive Leadership Team</p>	<p>Delivery of March 2020 savings (£14m)</p> <p>Finance Review Panel identified immediate measures (in year savings £10.2m).</p> <p>Spending Control Panel in place monitoring and approving all expenditure across the Council.</p> <p>Staffing review being implemented to save 15% of costs.</p> <p>Task Force produced submission / application to MHCLG for additional funding via Captilisation Directive</p>	5	5	25	<p>Assurance on the Quarter 2 (2020/21) Report to be provided.</p> <p>Departmental Leadership Teams (DLT's) to monitor departmental expenditure on monthly basis.</p> <p>Monthly reporting to the Executive Leadership Team (ELT) on 'in year' savings (£14m + £10.2m)</p> <p>The s.151 Officer and the Monitoring Officer to review and consider the ongoing financial rationale for the Council in the equity investment arrangement with BxB.</p> <p>The s.151 Officer to lead a review of the financial rationale and associated risks and then make recommendations to Cabinet and ELT as to the continuation and viability of the Revolving Investment Fund.</p> <p>The s.151 Officer to revisit the Minimum Revenue Provision Policy to demonstrate that a prudent approach is being taken.</p>	5	4	20

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ELT0006  Kerswell, Katherine	<p>Robust governance &amp; risk management procedures/frameworks are not activated to safeguard the interests (financial &amp; reputational) of the Council and its taxpayers within all subsidiary organisations where the Council has an interest.</p> <p>(Specifically in reference to Brick X Brick &amp; Croydon Homes LLP).</p> <p>Grant Thornton - 'Report in the Public Interest' recommendation number(s): 8,12,17,19 &amp; 20.</p>	<ul style="list-style-type: none"> <li>• Significant financial loss.</li> <li>• Reputational damage.</li> <li>• Political interest and scrutiny.</li> <li>• Media interest and scrutiny.</li> <li>• Council placed in unstable financial position leading to potential bankruptcy.</li> <li>• Significant fraudulent activity.</li> <li>• Continuing and increasing levels of non-compliance.</li> </ul>	Kerswell, Katherine  Executive Leadership Team	<p>Annual business plan of BXB reported to Cabinet.</p> <p>Cabinet member responsibility in portfolio.</p> <p>LBC non-executive directors allocated to serve on all subsidiary Boards.</p> <p>Shareholder Board created September 2019.</p>	5	5	25	<p>Create a dedicated shareholder function to manage relationship and risks.</p> <p>Enhanced review of papers being presented to Boards.</p> <p>Review of the transparency of reporting of any remedial action taken to address in year overspends.</p> <p>S.151 Officer review of the financial rationale and associated risks. Recommendations to Cabinet &amp; Council on the future of the revolving investment fund.</p> <p>Strategic review recommendations agreed to reduce risks and deliver secure financial path forward.</p> <p>The s.151 Officer and the Monitoring Officer to review and reconsider the ongoing financial rationale for the Council in the equity investment arrangement with BxB.</p>	5	3	15

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ELT0007  Kerswell, Katherine	Poor financial control and ineffective governance arrangements leads to financial bankruptcy.  Grant Thornton - 'Report in the Public Interest' recommendation number(s):1-20.  ).	<ul style="list-style-type: none"> <li>Internal Controls rated at 'limited' or 'no assurance' by Head of Internal Audit.</li> <li>Continuing instances of non-compliance with corporate policies and legislative requirements.</li> <li>Political scrutiny and interest at local and national level.</li> <li>Media interest at local and national level.</li> <li>Increasing and uncontrollable financial loss.</li> <li>Legislative action.</li> <li>Staff redundancies.</li> <li>Report in the Public Interests (RIPI) issued by External Auditors.</li> </ul>	Kerswell, Katherine  Executive Leadership Team	<p>CLT co-ordination to identify and instigate savings strategies.</p> <p>Collaborative working initiated with MHCLG.</p> <p>Finance Consultant issued report into improving finance system.</p> <p>Finance Review Panel initiated. Led by independent Chair(s) to investigate the Council's financial strategy and approach and to make recommendations for changes to operational and strategic practice.</p> <p>Immediate spending controls implemented across the Council. Recruitment; PCards; Expenditure control greater than £10k (Purchase Orders).</p> <p>Introduced non-essential spend and recruitment controls as if s.114 notice issued.</p> <p>Leader, Cabinet Member for Finance &amp; Resources and the Chair of General Purposes &amp; Audit Committee attended LGA Training 07/11/2020.</p>	5	5	25	<p>Move to monthly reporting to ELT / Cabinet.</p> <p>Proper management of purchase orders to ensure compliance with corporate policy to eliminate retrospective activity.</p> <p>Rapid review completed to highlight issues.</p> <p>Training programmes to be introduced to improve General Purposes &amp; Audit Committee (GPAC) and Scrutiny Committees.</p>	5	3	15

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				Spending Control Panel in place monitoring and approving all expenditure across the Council.							

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FIR0021  Taylor, Lisa	Funding levels provided through the Government Grant are significantly lower than forecast or anticipated, resulting in considerable savings being required to balance the Council's Medium Term Financial Strategy.	<ul style="list-style-type: none"> <li>• Service disruptions or services ceased</li> <li>• Key manifesto / corporate objectives not achieved.</li> <li>• Resident dissatisfaction.</li> <li>• Media and political scrutiny.</li> <li>• Legal challenge and associated consequences.</li> <li>• Staff reductions / redundancies.</li> <li>• Unable to deliver a balanced budget.</li> <li>• Issue Section 114 notice.</li> </ul>	Harris-Baker, Jacqueline  Resources Department / Corporate	<p>Continued lobbying with MHCLG for fair funding.</p> <p>Continued maintenance of general fund reserve at current levels, with an ambition to increase the minimum level of reserves to 5% of the net revenue budget to cover any major unforeseen expenditure.</p> <p>Continuing approach to organisational efficiency including smart commissioning &amp; procurement strategies, and recruitment controls. Targeted approach to early intervention and prevention strategies (children's and adult's social care) and exploitation of opportunities for working in collaboration with our partners.</p> <p>Continuous monitoring / scrutiny of all budgets and commitments.</p> <p>Diversification of organisational operating portfolio's (incl. asset investment / revenue generation opportunities.</p> <p>Ongoing Covid-19 financial assistance is being provided by central government to all LA's.</p>	5	5	25	<p>Continued focus / investigation into effective approaches to managing social care demand.</p> <p>Continued strategic approach to identifying efficiencies and savings through changes to the way the Council works e.g. exploiting new technology, consolidation of buildings and processes.</p> <p>Detailed MTFS planning as part of MHCLG submission.</p> <p>Further bids for Covid-19 funding are being formulated.</p> <p>Identification of new ways to strengthen the long term financial position through increasing income sources.</p> <p>Strategies being developed to promote and stimulate new growth opportunities.</p>	5	4	20

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PH0001 Flowers,Rache l	<p>All statutory obligations are not fulfilled by the Director of Public Health as required by the 1938 Public Health Act.</p> <p>**Effective and appropriate activities are in place in respect of the Council wide activation (March 2020) of it's emergency preparedness protocols / response activities in respect of an excess death event (COVID-19)**.</p>	<ul style="list-style-type: none"> <li>• Central government control implemented (civil control removed).</li> <li>• Political scrutiny.</li> <li>• Inability to ensure operational delivery in relation to the Council's ability to respond.</li> <li>• Reputational damage.</li> <li>• Financial loss.</li> <li>• Media interest and scrutiny.</li> <li>• Civil unrest due to inadequate / inappropriate response.</li> </ul>	<p>Van Dichele, Guy</p> <p>Health, Wellbeing &amp; Adult Services</p>	<p>Activation of LBC GOLD and SILVER national standard Emergency Planning meetings.</p> <p>BECC activated 16th March 2020.</p> <p>Council GOLD meeting weekly to monitor and review situation.</p> <p>Excess Death Scenario 'Task &amp; Finish Group' participation.</p> <p>LSP of all Croydon parties regularly briefed.</p> <p>Ongoing collaborative working with Corporate Resilience Team to ensure regular review and update of Council's Pandemic Plan.</p>	5	5	25	<p>Director of Public Health influence in respect of non-assurance with Exec Management. - incorporates liaising with relevant Directors and HoS to ensure clarity around plans in place and receive assurance as to organisational preparedness.</p> <p>Q3 (2020/21) Anticipate more information / learning published re: Council &amp; Multi-Agency approach to responses e.g. COVID-19</p>	5	3	15

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ASC0001  McPartland, Annette	Social Care market supply disruption leading to market failure and inability to fulfil statutory requirements.  Risk jointly owned with Commissioning & Procurement.	<ul style="list-style-type: none"> <li>• Reduction in choice.</li> <li>• Failure to meet service user needs.</li> <li>• Delayed discharge from hospital.</li> <li>• Increase budget pressure.</li> <li>• Reduced quality of provision.</li> <li>• Increase in safeguarding concerns.</li> <li>• Increase number of providers within the provider concerns process.</li> <li>• Increases in delays or overpayments to providers.</li> <li>• Increase pressure on all internal services.</li> </ul>	Van Dichele, Guy  Health, Wellbeing & Adult Services	<p>ADASS Pan London minimum standards programme adopted.</p> <p>Brokerage and Placements Quality Assurance.</p> <p>Corporate programme initiated on reviewing Placements &amp; Payments process in Adult Social Care (ASC).</p> <p>Croydon Dynamic Purchasing and e-market system commissioned September 2018.</p> <p>Inflation strategy in place to manage fees paid.</p> <p>Insourcing commenced on 04/01/2020 to help improve services to residents.</p> <p>Market management by Contract monitoring team.</p> <p>Monitoring of the provider market on a daily basis to ensure Care Homes and Domiciliary settings / providers are operating at appropriate levels following all statutory guidance.</p> <p>New Dynamic Purchasing System (DPS) for Home Care commenced May 2020.</p> <p>One Croydon Alliance Commissioning strategy ongoing implementation.</p>	5	4	20	<p>Bring Services 'in-house' where cost effective to do so.</p> <p>Creation of more 'Supported Living' capacity. Completion December 2020.</p> <p>Micro Commissioning arrangements for new DPS for Care Homes to be in place by January 2021.</p> <p>New Placement and Brokerage service to be introduced.</p> <p>Reablement in South of borough - Review ability for provision within area. Completion December 2020.</p> <p>Refreshed Market position statement.</p> <p>Restructured contract &amp; market management function with increased number of monitors.</p>	5	3	15

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				<p>Pan London provider concern's process managed by safeguarding team.</p> <p>Provider Failure Policy updated with C-19 Chapter.</p>							

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ASC0012  McPartland, Annette	The Council does not provide appropriate financial resource to meet the demand for Adult Social Care in line with all statutory obligations.	<ul style="list-style-type: none"> <li>Residents do not have their statutory needs met, reducing quality of life, and increasing the risk to life.</li> <li>Legal challenge (judicial review), and associated financial and reputational costs.</li> <li>Political and media scrutiny and interest.</li> <li>Unable to attract or retain a proportionately skilled permanent workforce, leading to increased use of agency staff, higher costs and reduced service quality.</li> </ul>	Van Dichele, Guy  Health, Wellbeing & Adult Services	<p>20/21 period 6 forecast used to identify current budget gap (run rate).</p> <p>Budget development meetings with cross Council peers, are enabling transparency, growth of service knowledge, and scrutiny of proposals.</p> <p>Change and efficiencies programme delivers savings / service change meeting annual targets, or escalating to the Croydon Renewal plan where there are significant issues.</p> <p>Cost of care tool and ASC FR national reporting tool, used to identify current activity and unit costs.</p> <p>Daily challenge panel lead by Director and heads of service, will ensure packages/placements do not exceed unnecessarily, the new target unit costs; and are appropriately using the strengths based practice model.</p> <p>Developing key performance indicators to identify the year on year target activity and units costs.</p> <p>Director and head of service / budget holder monthly monitoring.</p>	5	4	20	<p>5-7.5% reduction in spend on packages of care in mental health, younger and older adults.</p> <p>A Business Intelligence dashboard on key metrics on activity and unit costs aligns with monthly budget monitoring.</p> <p>Annual budget developed using performance review, aligned with continued modelling on activity and unit cost, demand and inflation advice from LGA.</p> <p>Directors, heads of service, budget holders and staff, know the budget, activity against targets and unit costs, and deliver services within these metrics and aligned to the Care Act (2021/22).</p> <p>Full Review of contracts and development of a 3 year commissioning plan.</p> <p>Older people activity and unit costs are at or below the national average. (By end of 2023/24).</p> <p>Options appraisal on Provider Services.</p>	5	3	15

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				<p>Ongoing equality impact analysis maintained on all projects, ensuring negative impacts are mitigated where possible.</p> <p>Senior management team have accepted the issues raised in the report in public interest; and the Local Government Association advice that our activity levels and spend are too high.</p> <p>Support from Local Government (LGA) Association to review proposed growth, key performance indicators and projects to deliver service change and savings.</p>				Younger adult activity and unit costs are at or below the London average (By end of 2023/24).			

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ASC0017  McPartland, Annette	<p>Young people transitioning from 18-25 to 25-65 Social Care Services are disadvantaged due to operational restrictions:</p> <p>Specifically:</p> <ul style="list-style-type: none"> <li>• Unaffordability and budget overspend;</li> <li>• Delays in assessment, reassessment and review;</li> <li>• Increase in staff caseload.</li> <li>• Managing parental expectations;</li> <li>• Insufficient management oversight and scrutiny of proposed placements</li> </ul>	<ul style="list-style-type: none"> <li>• High value care packages and placements transferring to 25-65 budget and creating additional budget pressures;</li> <li>• Additional case management activity transferring to the 25-65 service including reviews, reassessments, support planning, placement changes and potentially crisis intervention;</li> <li>• Existing short-term provision (defined as up to 2 years) could no longer be financially viable under the new funding model.</li> <li>• Closure of short-term supported housing schemes.</li> <li>• Commissioning new short-term supported housing more challenging due to the capital and revenue cost implications for providers and lack of certainty about future funding.</li> <li>• LBC may find its grant funding capped at a level that will not sustain short-term supported housing and may have to provide additional revenue support from its own resources to sustain schemes.</li> <li>• Implementation of the new funding model requires additional resources and shifts in existing resources.</li> </ul>	<p>Van Dichele, Guy</p> <p>Health, Wellbeing &amp; Adult Services</p>	<p>1 year forecast of service users transitioning at year end.</p> <p>3 year forecast of service users transitioning.</p> <p>Children with Disabilities (CwD) -- Recruitment of assessment and support planning staff in transitions to ensure stable and cost effective placements and packages of care prior to transition.</p> <p>Current protocols require transition with stable placement or care package and thereby reducing the requirement for urgent intervention.</p> <p>Developing and improving the local service offers for supported accommodation, active lives and employment.</p> <p>Forecasting used to develop growth bids and inform budget build.</p> <p>High value placements and care packages are selected for reassessment by Complex Care Team as part of the high cost placement reviews.</p>	4	5	20	<p>Complex care team intervention through high cost placement review may have a positive impact in terms of reducing financial impact.</p> <p>Manage parental expectations through the broader work stream on strength based assessment model.</p> <p>Provision of a comprehensive service offer for accommodation, active lives and employment.</p>	4	4	16

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ASC0024  McPartland, Annette	The level of resource required to manage demand and reduce costs safely within time-frame is insufficient.	<ul style="list-style-type: none"> <li>• Even if the 21/22 growth is approved based on the 20/21 run rate, demand and inflation growth; savings and service change will not be delivered to ensure activity and unit costs are reduced to the advised level.</li> <li>• Overspent budget, if resources are not at the required level.</li> </ul>	Van Dichele, Guy  Health, Wellbeing & Adult Services	<p>Daily challenge panel lead by Director and heads of service.</p> <p>Delivery of £5.3m in year target for 20/21 and delivery of £350k immediate measure targets for 20/21.</p> <p>Direct payments as a first offer.</p> <p>Voluntary sector commissioning model review.</p> <p>Weekly senior management team meeting to oversee operational business as usual performance, safeguarding and workforce issues are managed.</p>	5	4	20	<p>A Health Wellbeing and Adults Department change and innovation team, identifying and delivering the savings and change programme.</p> <p>Director and head of service / budget holder monthly monitoring.</p> <p>Integration continues to focus on integrated governance, pooled budgets and system planning.</p> <p>Ongoing equality impact analysis maintained on all projects, ensuring negative impacts are mitigated where possible.</p>	5	3	15

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C190017  Kerswell, Katherine	Continuing increase in the infection rate leads to the Government placing further restrictions on residents & businesses resulting in a prolonged demand for emergency provision of services.	<ul style="list-style-type: none"> <li>• Services are severely disrupted or stopped (including P1).</li> <li>• Reputational damage.</li> <li>• Death or serious injury.</li> <li>• Political and media interest and scrutiny.</li> <li>• Support businesses are unable to meet demand (i.e. pharmacies etc).</li> </ul>	Kerswell, Katherine  Covid-19	<p>Public Health and all statutory service teams collaborating with all relevant partner organisations and central government to operate at 'best practice' standard and to comply with all legislative instructions and guidelines.</p> <p>SILVER meeting regularly to review and escalate where appropriate to GOLD.</p>	5	4	20	<p>Continue to monitor the R rate and emerging data in relation to infection rates and virus strains.</p> <p>Continuous review of ability to activate mutual aid and status to engage redeployment strategies.</p>	5	3	15

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C190019  Kerswell, Katherine	<p>The spread of the C-19 infection and the nature of the interventions implemented to reduce it widen health inequalities and increase demand on all Council services.</p> <p>** e.g. overcrowded/poor housing - less effective self-isolation; those in deprived areas more likely to have underlying conditions; unsecure employment leading to great financial insecurity**.</p>	<ul style="list-style-type: none"> <li>Increasing demand on Council services as this occurs.</li> <li>Increased mortality and morbidity in more vulnerable groups.</li> <li>Adult Social Care pressure.</li> <li>Housing demand.</li> <li>Political and media interest.</li> </ul>	<p>Kerswell, Katherine</p> <p>Covid-19</p>	<p>Council wide Inequalities programmes including Local Strategic Partnerships (LSP).</p> <p>Deep dive with data to identify if there are patterns around testing e.g. people not accessing testing or testing positive e.g. community clustering.</p> <p>Epidemiology data provided by DHSC and LCRC reviewed by PH Team on a daily basis to enhance understanding.</p> <p>Good engagement across borough with C19 Health Protection Board that provides oversight to the Outbreak Control Plan.</p> <p>Lower level risks discussed on regular basis at SILVER and escalated where necessary.</p> <p>The Outbreak Control Plan operating to ensure that there is coordinated approach to provide effective delivery across the borough in a coordinated and targeted process.</p>	5	4	20	<p>Targetting comms and engagement to the 'at risk' populations.</p> <p>COVID-19 and flu messaging detailed in the NHS Health Check invitation letter sent to people aged 40-74.</p> <p>Developed ward level Power BI dashboard to analyse data at a local level.</p> <p>Director of PH is Regional Lead for London (ASC) and briefing LSP / ELT / GOLD on epidemiology and control measures.</p> <p>Ensuring vulnerable people are supported through the support grant and, where necessary, food and medication support.</p> <p>Provided free school meal vouchers.</p>	5	2	10

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ED0001  Davies, Shelley	<p>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 Dedicated Schools Grant (DSG) budget, which can't be funded from General Fund reserves.</p> <p>**The in-year overspend for 2019/20 was £5.434 million, with a DSG cumulative overspend of £14.558 million. The Department for Education (DfE) has confirmed the provisions in The School and Early Years Finance (England) Regulations 2020 establishing a statutory requirement for any DSG deficit balance to be held within the local authority's overall DSG, meaning authorities cannot fund deficit from general fund without Secretary of State approval**.</p>	<ul style="list-style-type: none"> <li>• Children and families do not receive the advice and support they would expect.</li> <li>• Increased costs due to tribunals and complaints leading to reduced reputation.</li> <li>• Inability to achieve outcomes for children and families in Croydon.</li> <li>• LBC over reliance on 'independent sector'.</li> <li>• Increase in Education, Health &amp; Care (EHC) Plans issued with no additional funding provided.</li> </ul>	Jones, Debbie  Children Families & Education Services	<p>Addington Valley Academy Free School opened in temporary site for Year 7 (September 2020).</p> <p>Continue to use Council Members / MP's to lobby Central Government for a review of the model that funds higher needs to reflect the actual demand for Croydon.</p> <p>DSG Recovery Plan (balanced budget 2024/25) approved by Schools forum.</p> <p>Free School opened which will relieve pressure in spend in non-mainstream sector.</p> <p>Further senior management review of existing plans.</p> <p>High Needs Funding Review planned.</p> <p>Implement strategies for managing demand for more effective mainstream school placements.</p> <p>Implementation of joint working with other local authorities to reduce placement costs. South London dynamic purchasing system (SL DPS).</p> <p>Improved forecasting and reporting of demand led spend to manage overall budget position.</p>	5	4	20	<p>0-25 SEND Strategy Implementation Plan to deliver change across the system.</p> <p>Addington Valley Free School will open on substantive site for all year groups (September 2021).</p> <p>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.</p> <p>Graduated response – right support, right time. Meeting needs locally in local schools at SEN Support level; reduced reliance on alternative education.</p> <p>Joint Working – children's needs are met locally in Croydon (cost avoidance in independent sector), through co-ordinated and coherent pathways which are achieved through collaborative work with parents and YP; across education, health and care.</p>	5	3	15

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				<p>Improved projections for school places.</p> <p>July 2019 5 yr deficit recovery plan submitted to DfE.</p> <p>Modelling of Locality Based Working &amp; Staged Approach supporting mainstream schools meeting SEN needs.</p> <p>Post 16 specialist placements provision created at Coulsdon College for pupils in Sept 2019.</p> <p>SEN strategy 2019 - 2022 presented and approved by Cabinet March 2019 following consultation. Plans to improve impact of service and measure to mitigate against cost.</p> <p>Utilised the additional funding allocated in the 2019 'Spending Review'.</p>				<p>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).</p> <p>South London Partnership SEN Commissioning Programme for commissioning residential and day placements for children and young people with Special Education Needs.</p> <p>Training for travel providers in supporting PMLD and any other pupils requiring APG treatments – and how to maintain safe Covid 19 Health practices should this be required.</p>			

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	Risk	Impact			Impact	L'hood	Total		Impact	L'hood	Total
ED0002  Davies, Shelley	<p>That a 'Local Area (OFSTED) Inspection' could issue a letter detailing improvement requirements / concerns in respect of the SEND Service.</p> <p>**The Education Directorate is coordinating the Council's approach but the responsibility is jointly shared by Education, Health &amp; Children's Social Care**</p>	<ul style="list-style-type: none"> <li>• Reputational damage.</li> <li>• Government intervention.</li> <li>• Financial cost of implementing wide ranging changes.</li> <li>• Difficulty in recruiting and retaining experienced and effective workforce.</li> <li>• Media scrutiny.</li> <li>• Political scrutiny and activity.</li> <li>• Increased referrals into SEND service and associated financial pressures.</li> <li>• Judicial Review.</li> </ul>	<p>Jones, Debbie</p> <p>Children Families &amp; Education Services</p>	<p>Governance structure introduced to oversee delivery and implementation of the Improvement Strategy.</p> <p>SEN Improvement Board established &amp; meeting monthly to monitor SEN improvement plan and strategy.</p> <p>SEND Inspection Readiness Working Group set up September 2020.</p>	4	5	20	<p>Consideration as part of the Children's Improvement Board objectives.</p> <p>Implement plan to ensure 'Local Area' is Inspection ready. The SEND strategy is a three year strategy, we have a five year DSG recovery plan and in terms of inspection readiness we are awaiting the inspection call in either the Autumn term 2020 or Spring Term 2021.</p> <p>Implementation of 0-25 SEND strategy.</p>	4	4	16

Risk Ref	Risk Scenario		Exec Director	Existing Controls	Current			Future Controls	Future Risk Rating		
	Risk	Impact			Impact	L'hood	Total		Impact	L'hood	Total
ED0003  Davies, Shelley	<p>Increasing number of Council maintained schools moving into a financial deficit leading to default and arrears.</p> <p>**Currently there are 10 of our 50 maintained schools in deficit. Two schools account for a significant proportion (St Andrews at £2.716m and Virgo Fidelis at £2.5m) for which the Council holds liability**.</p>	<p>• Financial loss to LBC as the Council holds liability to settle deficit should schools transfer to academy status.</p>	<p>Jones, Debbie</p> <p>Children Families &amp; Education Services</p>	<p>'Schools of concern' are under monthly review.</p> <p>Deficit schools report financial outturn monthly to LBC.</p> <p>Implementation of new strategies following Independent Financial Review of 'Schools in Deficit' funded from DSG schools block. Visits to 'Schools in Deficit' commenced September 2020.</p> <p>Oversight of any significant deficit reporting as a result of C19 in place.</p> <p>Regular update meetings with the Governing Body's / SLT's of schools with the highest levels of debt.</p> <p>Risk rating system is in place for each of the schools that are either in deficit or 'causing concern'.</p> <p>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.</p>	4	5	20	<p>The decision was made to delay the independent financial review of the schools to later in the autumn term to allow schools to restate their budgets following the impact both positive &amp; negative from the pandemic.</p>	4	3	12

Risk Ref	Risk Scenario		Exec Director	Existing Controls	Current			Future Controls	Future Risk Rating		
	Risk	Impact			Impact	L'hood	Total		Impact	L'hood	Total
				<p>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.</p> <p>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.</p> <p>Where appropriate the Council is using its statutory powers to investigate installing an Interim Executive Board (IEB). Powers are limited in terms of financial benefit to the LA but could steer the school towards a form of collaboration with another education body. Output from the independent Financial Review to inform the LA of next steps. Target date of September 2020.</p>							

Risk Ref	Risk Scenario		Exec Director	Existing Controls	Current			Future Controls	Future Risk Rating		
	Risk	Impact			Impact	L'hood	Total		Impact	L'hood	Total
ELT0001  Kerswell, Katherine	<p>Effective action is not taken to address the underlying causes of social care overspends within Children's Services, specifically in terms of both the demand and the resulting cost pressures.</p> <p>Grant Thornton - 'Report in the Public Interest' recommendation number: 1  ).</p>	<ul style="list-style-type: none"> <li>• Continuing financial loss.</li> <li>• Political scrutiny.</li> <li>• Media interest.</li> <li>• Senior officer resignations.</li> <li>• Legislative action.</li> <li>• Reputational damage.</li> <li>• Potential harm to clients.</li> </ul>	<p>Kerswell, Katherine</p> <p>Executive Leadership Team</p>	<p>Finance Review Programme completed and recommendations being acted on.</p> <p>Renewing Croydon Task &amp; Finish Group activated.</p>	5	4	20	<p>Ongoing implementation of audit recommendations.</p> <p>Submission to MHCLG identified clear focus on improvement of Children's Social Services to achieve specific actions.</p> <p>Work streams tasked with reviewing existing processes to identify cost and demand savings.</p>	5	3	15

Risk Ref	Risk Scenario		Exec Director	Existing Controls	Current			Future Controls	Future Risk Rating		
	Risk	Impact			Impact	L'hood	Total		Impact	L'hood	Total
ELT0002  Kerswell, Katherine	Effective action is not taken to address the underlying causes of social care overspends within Adult's Services, specifically in terms of both the demand and the resulting cost pressures.  Grant Thornton - 'Report in the Public Interest' recommendation number: 1	<ul style="list-style-type: none"> <li>• Continuing financial loss.</li> <li>• Political scrutiny.</li> <li>• Media interest.</li> <li>• Senior officer resignations.</li> <li>• Legislative action.</li> <li>• Reputational damage.</li> <li>• Potential harm to clients.</li> </ul>	Kerswell, Katherine  Executive Leadership Team	Finance Review Programme initiated.  Renewing Croydon Task & Finish Group initiated.	5	4	20	Ongoing implementation of audit recommendations.  Workstreams in place to identify cost savings and demand management processes.	5	3	15

Risk Ref	Risk Scenario		Exec Director	Existing Controls	Current			Future Controls	Future Risk Rating		
	Risk	Impact			Impact	L'hood	Total		Impact	L'hood	Total
ELT0004  Kerswell, Katherine	Ineffective management of identified risk leads to organisational failure.  Grant Thornton - 'Report in the Public Interest' recommendation number(s):1-20.	<ul style="list-style-type: none"> <li>• Inaccurate risk reporting leads to risk materialisation and consequences associated with them.</li> <li>• Service disruption, death or serious injury.</li> <li>• Political and media interest and scrutiny.</li> <li>• Leadership Team (senior officer / Cabinet Member) resignations / potential legislative action taken against individuals.</li> <li>• Continuing and increasing financial loss.</li> <li>• Public unrest / disorder.</li> <li>• Legal action against Council instigated.</li> <li>• S.114 Notice submitted.</li> <li>• Political scrutiny (national level).</li> <li>• Media interest and scrutiny.</li> </ul>	Kerswell, Katherine  Executive Leadership Team	<p>Corporate Risk Management Framework adapted to ensure organisation is able to function effectively and efficiently.</p> <p>Effective risk recording mechanism in place allowing for 'high level Risk Register reporting to leadership. ELT are accountable for successful delivery of the Council's Risk Management Framework.</p> <p>Frequency of management oversight of risk register has increased at a senior level in line with demand.</p> <p>Risk is standing item on regular ELT risk reviews.</p> <p>Risk Register utilised as a framework for review and therefore included as a standing item on GOLD Agenda.</p> <p>Risk Team form part of core organisational groups.</p>	5	4	20	<p>Continuous horizon scan review of national and global events / trends.</p> <p>Rapidity of escalation to ELT being reviewed to achieve desired outcome.</p> <p>Thorough review of RM Framework once emergency response decommissioned to identify lessons learned and best practice to incorporate in future corporate Risk Management Framework.</p>	5	3	15

Risk Scenario						Current			Future Risk Rating		
Risk Ref	Risk	Impact	Exec Director	Existing Controls	Impact	L'hood	Total	Future Controls	Impact	L'hood	Total
ELT0008  Kerswell, Katherine	<p>There is no effective challenge, review, investigation or ownership taken on all activities that the Council undertakes by the Executive Leadership Team, Cabinet and all Scrutiny Committees (including GPAC).</p> <p><b>**This risk specifically relates to financial strategy, treasury management strategy (including borrowing), capital investment strategies and appropriateness of continuing investment and association with BXB**</b></p> <p>Grant Thornton - 'Report in the Public Interest' recommendation number(s): 2,5,8,9,10,11,14,15 &amp;17.</p>	<ul style="list-style-type: none"> <li>• Government commissioners brought in to run Council.</li> <li>• All services immediately ceased (except where statutory duty).</li> <li>• Political scrutiny and interest at local and national level.</li> <li>• Media interest at local and national level.</li> <li>• Increasing financial loss.</li> <li>• Legislative action.</li> <li>• Staff morale decreased.</li> </ul>	<p>Kerswell, Katherine</p> <p>Executive Leadership Team</p>	<p>Appropriate risk assessments being conducted prior to budget approval.</p> <p>ELT, Cabinet and Scrutiny Committees regular report review process initiated.</p>	5	4	20	<p>Detailed Treasury Management training to be delivered in order to assist Members to better understand and challenge the long-term financial implications of matters reported within the Treasury Management Strategy.</p> <p>Reports on actions presented to GPAC and Scrutiny Committees in a timely manner. These reports will include:</p> <ul style="list-style-type: none"> <li>• A comprehensive update on the High Needs Funding Block being taken to address the Dedicated Schools Grant (DSG) and highlight whether appropriate progress is being achieved. This is added to the GPAC Agenda.</li> <li>• An appraisal of the Growth Zone activities (and assumptions) and recommendations as to whether there should be continued investment in the scheme.</li> </ul>	5	3	15

Risk Scenario					Current			Future Risk Rating			
Risk Ref	Risk	Impact	Exec Director	Existing Controls	Impact	L'hood	Total	Future Controls	Impact	L'hood	Total
ELT0015  Kerswell, Katherine	The data provided from within the organisation via corporate systems and processes is inaccurate and incomplete.	<ul style="list-style-type: none"> <li>Inaccurate / misleading reporting.</li> <li>Financial loss.</li> <li>Reputational damage.</li> <li>Political and media scrutiny.</li> </ul>	Kerswell, Katherine  Executive Leadership Team	<p>Data validation activities to ensure accuracy.</p> <p>Review of existing data recording practices / processes to ensure accuracy.</p> <p>Workstream initiated to ensure activities are appropriate.</p>	5	4	20	<p>Enhanced review of data recording to identify appropriate strategies to mitigate.</p> <p>Project underway to correct establishment data within My Resources (review progress / reporting January 2021).</p> <p>Subject experts to be engaged to workflow current practices and identify control weaknesses.</p>	5	2	10

Risk Ref	Risk Scenario		Exec Director	Existing Controls	Current			Future Controls	Future Risk Rating		
	Risk	Impact			Impact	L'hood	Total		Impact	L'hood	Total
ELT0019  Kerswell, Katherine	<p>The scale and ambition of the capital programme creates a requirement for borrowing that exceeds affordability.</p> <p>Grant Thornton - 'Report in the Public Interest' recommendation number(s):12,16 &amp; 19.</p>	<ul style="list-style-type: none"> <li>• Insufficient capital available to meet financial commitments / obligations.</li> <li>• Leadership collapse.</li> <li>• Political and media scrutiny.</li> <li>• Government intervention.</li> <li>• s.114 Notice submitted.</li> <li>• Leadership and senior officer resignations.</li> </ul>	<p>Kerswell, Katherine</p> <p>Executive Leadership Team</p>	<p>Finance Review Programme initiated.</p> <p>Quarterly review and scrutiny.</p> <p>Review of existing expenditure / workstreams to identify cost reductions.</p> <p>Specific workstream initiated to identify capital programmes that can be decommissioned.</p>	5	4	20	<p>Best practice identification.</p> <p>Ongoing Cabinet and ELT review.</p> <p>Ongoing monitoring and strategy identification.</p>	5	2	10

Risk Ref	Risk Scenario		Exec Director	Existing Controls	Current			Future Controls	Future Risk Rating		
	Risk	Impact			Impact	L'hood	Total		Impact	L'hood	Total
ELT0020  Kerswell, Katherine	<p>The council's financial strategy does not enable it to maintain the required level of reserves.</p> <p>Grant Thornton - 'Report in the Public Interest' recommendation number: 2.</p>	<ul style="list-style-type: none"> <li>• Insufficient reserves available leading to financial insolvency.</li> <li>• Leadership collapse.</li> <li>• Political and media scrutiny.</li> <li>• Government intervention.</li> <li>• s.114 Notice submitted.</li> <li>• Leadership and senior officer resignations.</li> </ul>	<p>Kerswell, Katherine</p> <p>Executive Leadership Team</p>	<p>Medium Term Financial Strategy (MTFS) Programme initiated.</p> <p>Activities to mitigate further losses initiated.</p> <p>Comprehensive budget setting activities initiated.</p> <p>Finance Review Programme completed and recommendations arising currently being implemented.</p>	5	4	20	<p>Best practice identification.</p> <p>Ongoing Cabinet and Executive Leadership Team (ELT) review.</p> <p>Ongoing monitoring and strategy identification.</p>	5	3	15

Risk Ref	Risk Scenario		Exec Director	Existing Controls	Current			Future Controls	Future Risk Rating		
	Risk	Impact			Impact	L'hood	Total		Impact	L'hood	Total
HSI0001 Ali, Ozay	<p>The investment strategy and income generating properties do not deliver the required financial benefits.</p> <p><b>**Main Risks CPH (£1.75m), Colonnades (potential £700k), Davis House (£200k), BWH (Arcadis £750k) remainder portfolio (£100k). Issue compounded by the inability of landlords to take swift action through the courts to pursue non-payment remedies**.</b></p>	<ul style="list-style-type: none"> <li>Financial loss due to under-performance of assets through non-payment of rents due to failure of tenants, reduced rents or deferrals.</li> <li>Service area funding / continuity of delivery could be impacted as a result of lower revenue income to support.</li> <li>Reputational damage due to failure of high profile assets.</li> <li>Political and media scrutiny.</li> <li>Covid-19 pandemic and Brexit significantly impact on investment properties and the general rental income across the wider portfolio leading to reduced revenue generation.</li> <li>Inability of landlords to take swift action through the courts to pursue non-payment remedies</li> </ul>	<p>Mustafa, Shifa</p> <p>Place Department</p>	<p>Clear and agreed (Scrutiny &amp; Cabinet) strategy in place. Strategy incorporates CIPFA recommendations.</p>	4	5	20	<p>Development of a new corporate Asset Strategy will help focus resources in the most appropriate way.</p> <p>Employing experienced Asset Managers to advise on major investment asset to ensure longer term security through extended leases and securing strong covenants / tenants.</p> <p>Looking at new ways to utilise properties to secure longer term security.</p> <p>Spending strategy stopped with immediate effect for any more investment purchases.</p> <p>The outputs identified in the MTFS sprint sessions will assist in the achievement of the financial benefits through the implementation of the investment strategy.</p> <p>The senior management reorganisation and restructure will provide the supporting framework to ensure the necessary stakeholders are able to contribute effectively and efficiently to the delivery of the financial benefits through the investment strategy.</p>	4	3	12

Risk Ref	Risk Scenario		Exec Director	Existing Controls	Current			Future Controls	Future Risk Rating		
	Risk	Impact			Impact	L'hood	Total		Impact	L'hood	Total
HSI0011 Ali, Ozay	The Council does not meet its obligations in respect of new and emerging legislation for the delivery of the General Building Works and Mechanical upgrade works across the HRA estate.	<ul style="list-style-type: none"> <li>• Unsafe buildings.</li> <li>• Enforcement action against the Council by regulatory bodies.</li> <li>• Political scrutiny and interest at local and national level.</li> <li>• Media interest at local and national level.</li> <li>• Substantial financial loss.</li> <li>• Serious incident / injury.</li> <li>• Criminal investigation with charges brought against officers possibly leading to custodial sentences.</li> </ul>	Mustafa, Shifa  Place Department	<p>Forward Programming of works to substitute other HRA non-essential works. In addition where required to install a 'Waking Watch' provision.</p> <p>On-going review of draft legislation. Liaison with key stakeholders.</p>	4	5	20	Commissioning of fire safety works to be prioritised over other HRA workstreams.	4	3	12

Risk Ref	Risk Scenario		Exec Director	Existing Controls	Current			Future Controls	Future Risk Rating		
	Risk	Impact			Impact	L'hood	Total		Impact	L'hood	Total
PST0001  Cheesbrough, Heather	<p>The Whitgift Centre is not redeveloped as anticipated.</p> <p>Previous uncertainty in respect of retail behaviours has been exacerbated by Covid 19, which has further affected the likelihood of the risk materialising. The redevelopment was removed from the Unibail development pipeline in Feb 20 and there is no date for the redevelopment.</p> <p>The Croydon Limited Partnership (CLP) partners are both suffering from loss of income and are seeking to raise funding to strengthen their balance sheets.</p>	<ul style="list-style-type: none"> <li>Major economic and social impact if development does not go ahead.</li> <li>Political and media scrutiny.</li> </ul>	Mustafa, Shifa  Place Department	<p>A robust Meanwhile and Management Strategy to maintain footfall.</p> <p>Communication channels between politicians and officers kept cordial and relationship maintained with CLP to optimise influence.</p> <p>Officers and their consultant team continue to seek to hold CLP to account on their plans and to manage the CPO process to minimise impact to the Council's reputation and the vitality of the town centre.</p> <p>Projects will need to be reprofiled within the Growth Zone to later years.</p> <p>The Council through its statutory powers - Local Planning Authority (LPA), CPO and land assembly, and as a Highway Authority.</p> <p>The Indemnity Land Transfer Agreement (ILTA) sets out the responsibilities of the parties, penalties with timeframes, which will need to be complied with and will need to be actively managed.</p>	4	5	20	<p>Consultation with all interested parties, including major land holders.</p> <p>End the arrangements entirely with agreement, but would have to address all outstanding issues, land transfer, compensation and make provision for various outstanding claims.</p> <p>Refusal to issue Notice of Entries (NoEs).</p> <p>Regular meetings with CLP to maintain dialogue between partners. Robust discussion through planning pre-application process.</p> <p>Robust discussion through planning pre application process for any new application.</p> <p>The Council introduces a new development partner.</p> <p>The preparation of a new Indemnity Land Transfer Agreement (ILTA) that reflects the current circumstances.</p> <p>Withdrawing Notice to Treat (NTT).</p>	4	4	16