

## Appendix 1 Corporate Risk Register Red Risks

Risk Ref	Risk Scenario		Exec Director	Existing Controls	Current			Future Controls	Future Risk Rating		
	Risk	Impact			Impact	L'hood	Total		Impact	L'hood	Total
EHCS0001  Madden, Roisin	<p>The significant and increasing numbers of unaccompanied asylum seeking children (UASC) / 'care leavers looked after' arriving within the borough (above the national average) places substantial additional financial pressures on the Council in order to deliver its statutory obligations.</p> <p>**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**.</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>Continued use of the rota to place young people in other boroughs through the Pan-London Protocol.</p> <p>Delivering support to all relevant 'young people' whose appeal rights have been exhausted in order to effectively plan for their futures whilst also facilitating the withdrawal of the automatic support the Council has historically offered to all young people until age 25.</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. UASC will be presented to GPAC (March 2021).</p> <p>Present options for decision to elected members to meet the needs of children within the grant funding available. UASC will be presented to GPAC (March 2021).</p>	5	4	20

Risk Scenario					Current			Future Risk Rating			
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				<p>Ongoing and regular negotiation with the Home Office and Department for Education to secure agreement to the support currently provided to other port of entry authorities.</p> <p>Ongoing negotiation / lobbying of MHCLG as part of the capitalisation negotiation, in order to resolve the UASC pressure.</p> <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 London local authorities to secure practical support to share the disproportionate burden on Croydon.</p>							

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				<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>							

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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>	<p>Kerswell, Katherine</p> <p>Executive Leadership Team</p>	<p>Annual business plan of BXB reported to Cabinet.</p> <p>Cabinet member responsibility in portfolio.</p> <p>Dedicated shareholder function in place to manage relationship and risks.</p> <p>LBC non-executive directors allocated to serve on all subsidiary Boards.</p> <p>PwC Review of the transparency of reporting of any remedial action taken to address in year overspends.</p> <p>Shareholder Board created September 2019.</p> <p>Strategic review recommendations agreed to reduce risks and deliver secure financial path forward.</p>	5	5	25	<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. Proposal / strategy to be presented to Members (March 2021).</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. Proposal / strategy to be presented to Members (March 2021).</p>	5	3	15

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ELT0007  Kerswell, Katherine	<p>Poor financial control and ineffective application of governance arrangements continues to lead to an unstable financial situation.</p> <p>Grant Thornton - 'Report in the Public Interest' recommendation number(s):1-20.</p>	<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>	<p>Kerswell, Katherine</p> <p>Executive Leadership Team</p>	<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> <p>Monthly reporting to ELT / Cabinet.</p>	5	5	25	<p>Training programmes to be introduced to improve General Purposes &amp; Audit Committee (GPAC) and Scrutiny Committees. Planned training programme ongoing / continuous through financial year 2021/22.</p>	5	3	15

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				<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>Spending Control Panel in place monitoring and approving all expenditure across the Council.</p>							

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FIR0023 Buss, Chris	Further deterioration in Internal Control & Governance as a result of budget and resourcing constraints.	<ul style="list-style-type: none"> <li>Financial / Reputational and Legal implications arising from bad decision making.</li> <li>Inadequate financial governance</li> <li>Failure to comply with probity requirements, legislation, local regulations or council policy.</li> <li>S114 Notice.</li> <li>Report in the Public interest.</li> </ul>	Harris-Baker, Jacqueline  Resources Department / Corporate	<p>Committee Award process for contracts.</p> <p>Commissioning &amp; Procurement Framework in place and enforced.</p> <p>Governance Board established to monitor key governance issues.</p> <p>Higher profile of key policies and procedures and easier access to support and guidance.</p> <p>Implementation of 'Doing the Right Thing' training across the organisation to senior and budget managers.</p> <p>Robust Internal Audit Programme in place.</p> <p>Strategy implemented to raise profile of Governance / Internal Audit function to ensure appropriate adherence at all levels across organisation.</p> <p>Tendering Made Easy - web based guide produced to assist with compliance.</p>	5	5	25	Improved engagement with ELT to facilitate their enforcement and instruction through their departmental hierarchies. To be finalised April 2021.	5	3	15

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FIR0034  Buss, Chris	The audit of the 2019/20 and 2020/21 accounts requires a significant number of adjustments to be completed in order to provide a balance.	<ul style="list-style-type: none"> <li>• Unqualified accounts provided.</li> <li>• Additional £20m deficit over the two financial years.</li> <li>• Inappropriate financial behaviour and practice evidenced.</li> <li>• Political scrutiny applied at local and national level.</li> <li>• Media interest and scrutiny at local and national level.</li> <li>• Continuing financial loss.</li> <li>• Reputational damage.</li> <li>• Potential investigation of historic financial practices.</li> <li>• Impact on reserves</li> </ul>	Harris-Baker, Jacqueline  Resources Department / Corporate	Control measures to be confirmed	5	5	25	Control measures to be confirmed	5	5	25



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FIR0035  Buss, Chris	2022/23 financial year risk that the additional £60m savings set out by MHCLG in Capitalisation Direction Agreement (2021) are not identified and delivered.	<ul style="list-style-type: none"> <li>• Do not meet terms and conditions set out by MHCLG in Capitalisation Direction Agreement (2021) / Three Year Delivery Programme.</li> <li>• Inappropriate financial behaviour and practice evidenced.</li> <li>• Political scrutiny applied at local and national level.</li> <li>• Media interest and scrutiny at local and national level.</li> <li>• Impact on reserves</li> <li>• Continuing financial loss.</li> <li>• Reputational damage.</li> <li>• Potential investigation of historic financial practices.</li> </ul>	Harris-Baker, Jacqueline  Resources Department / Corporate	Control measures to be confirmed	5	5	25	Control measures to be confirmed	5	5	25

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PH0001 Flowers,Rache l	The Director of Public Health is unable to fulfil ALL statutory obligations as required under the 1938 Public Health Act in order to assure leadership that they can deliver the appropriate activities to ensure the safety and well-being of all residents within the borough during the Covid-19 pandemic.	<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>	Van Dichele, Guy  Health, Wellbeing & Adult Services	<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>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>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	Achievement of coverage for all age categories under the mass vaccination programme. Anticipated completion August 2021.	5	3	15

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VRN0003  Hayward, Sarah	<p>A rise in domestic abuse in the borough resulting in greater numbers of murders and serious harm.</p> <p>Referrals December 2020: 44 high harm high risk (Multi-Agency Risk Assessment Conference aka MARAC).</p> <p>**C19 --- The 4th January 2021 National Lockdown Restrictions is leading to additional increases in domestic abuse incidents resulting in an even larger increase in the demand on the Council's Domestic Abuse Support Service (DASS)**.</p>	<ul style="list-style-type: none"> <li>• Death or serious injury to clients and their children / families.</li> <li>• Financial loss due to increase in the pressure on inter-related services as well as DASS.</li> <li>• Legislative action.</li> </ul>	<p>Mustafa, Shifa</p> <p>Place Department</p>	<p>Feb 2021 - the council sought agreement to a refreshed approach from the partners in the Community Safety Partnership to the recommendations from Domestic Homicide reviews. This should give new focus from partners to learning the lessons from domestic homicides in the borough. Sought agreement to a refreshed approach from the partners in the Community Safety Partnership to the recommendations from Domestic Homicide reviews. This should give new focus from partners to learning the lessons from domestic homicides in the borough.</p> <p>Action plans for Safer Croydon Partnership.</p> <p>Action plans for the Council's Domestic Abuse Support Service (DASS).</p> <p>Active management of workloads and pressures on staff.</p> <p>Commissioning of DRIVE service provider.</p> <p>Contingency location identified if move is delayed.</p> <p>Crime &amp; Disorder Reduction Strategy.</p>	5	5	25	<p>Council will lead on the development of a new Community Safety Strategy for the Safer Croydon Partnership. Given our high and rising rates of domestic abuse it is likely to be a central area of focus. (Ongoing during 2021).</p> <p>Domestic Homicide Review findings pending following statutory review. Spring/Summer 2021</p> <p>The Council's annual strategic assessment will be published this will provide an evidence base to council practitioners and partners to better understand prevalence and types of domestic abuse across the borough. (March 2021).</p>	5	3	15

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Risk Ref	Risk	Impact	Exec Director	Existing Controls	Impact	L'hood	Total	Future Controls	Impact	L'hood	Total
				<p>Family Justice Centre Advocates for domestic abuse sufferers</p> <p>Chief Executive Group set up</p> <p>White Ribbon Borough and petition</p> <p>FJC team working with victims and putting in place new advocacy measures</p> <p>MARAC and DAPP processes in place. Occurring weekly to manage increased referral volume.</p> <p>Plans in place for prevention and support</p> <p>The Council's domestic violence conducts annual refresh of their own specific strategy and work programme</p> <p>The work of the Family Justice Centre.</p> <p>Working with the Police and other public agencies to increase referrals.</p>							

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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>Increased 'Supported Living' capacity created.</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>Micro Commissioning arrangements for new DPS for Care Homes in place.</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>	5	4	20	Future Controls measures to be confirmed.	5	4	20

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				<p>New Dynamic Purchasing System (DPS) for Home Care commenced May 2020.</p> <p>One Croydon Alliance Commissioning strategy ongoing implementation.</p> <p>Pan London provider concern's process managed by safeguarding team.</p> <p>Provider Failure Policy updated with C-19 Chapter.</p> <p>Reablement in South of borough - Review of ability for provision within area completed.</p> <p>Refreshed Market position statement.</p> <p>Restructured contract &amp; market management function with increased number of monitors.</p>							

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ASC0012  McPartland, Annette	The financial and staff resources provided cannot 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>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>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>	5	4	20	<p>Older people activity and unit costs to be 'at or below' the national average due to negotiation with providers. (Anticipated completion by end of financial year 2023/24).</p> <p>Younger adult activity and unit costs are at or below the London average due to negotiation with providers. (Anticipated completion by end of financial year 2023/24).</p>	5	3	15

Risk Scenario			Current			Future Risk Rating					
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				<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> <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>Implementation of a 5-7.5% reduction in the spending on packages of care in mental health, younger and older adults.</p>							



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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>							

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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>Complex care team intervention through high cost placement review.</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>	4	5	20	Future Controls measures to be confirmed.	4	5	20

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				<p>High value placements and care packages are selected for reassessment by Complex Care Team as part of the high cost placement reviews.</p> <p>Provision of a comprehensive service offer for accommodation, active lives and employment.</p>							

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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>Targeted comm's and engagement to the 'at risk' populations.</p> <p>Council wide Inequalities programmes including Local Strategic Partnerships (LSP).</p> <p>COVID-19 and flu messaging detailed in the NHS Health Check invitation letter sent to people aged 40-74.</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>Director of PH is Regional Lead for London (ASC) and briefing LSP / ELT / GOLD on epidemiology and control measures.</p> <p>Epidemiology data provided by DHSC and LCRC reviewed by PH Team on a daily basis to enhance understanding.</p> <p>Free school meal vouchers.</p> <p>Good engagement across borough with C19 Health Protection Board that provides oversight to the Outbreak Control Plan.</p>	5	4	20	<p>Achievement of coverage for all age categories under the mass vaccination programme. Anticipated completion August 2021.</p>	5	2	10

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				<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> <p>Ward level Power BI dashboard analyses data at a local level.</p>							

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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 is £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>0-25 SEND Strategy Implementation Plan to deliver change across the system.</p> <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>Delivery of 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> <p>DSG Recovery Plan (balanced budget 2024/25) approved by Schools forum.</p> <p>Early Identification and Intervention –improved HV assessment, identify needs, work with families early. Support provided for EY education providers, personalised inclusion funding until the end of EY Foundation Stage.</p>	5	4	20	Addington Valley Free School will open on substantive site for all year groups (September 2021).	5	3	15

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				<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>Graduated response – right support, right time. Meeting needs locally in local schools at SEN Support level; reduced reliance on alternative education.</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> <p>Improved projections for school places.</p>							

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	Risk	Impact			Impact	L'hood	Total		Impact	L'hood	Total
				<p>Joint Working – children's needs are being 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> <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 pathway development providing 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>Post 16 specialist placements provision created at Coulsdon College for pupils in Sept 2019.</p>							



Risk Scenario					Current			Future Risk Rating			
Risk Ref	Risk	Impact	Exec Director	Existing Controls	Impact	L'hood	Total	Future Controls	Impact	L'hood	Total
				<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>South London Partnership SEN Commissioning Programme in place for commissioning residential and day placements for children and young people with Special Education Needs.</p> <p>Utilised the additional funding allocated in the 2019 'Spending Review'.</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
ED0002  Davies, Shelley	<p>That a 'Local Area (OFSTED) Inspection' 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> <p>NB - Lockdown 3 means that OFSTED have stood down all review activity.</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>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.</p> <p>Implementation of revised 0-25 SEND 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>Future Controls measures to be confirmed.</p>	4	5	20

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>The number of Council maintained schools moving into a financial deficit leading to default and arrears continues to increase.</p> <p>**Currently there are 10 of our 50 maintained schools in deficit. Two schools account for a significant proportion (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>Future Controls measures to be confirmed.</p>	4	5	20

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>Ongoing implementation of audit recommendations.</p> <p>Renewing Croydon Task &amp; Finish Group activated.</p> <p>Submission to MHCLG that 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	4	20	<p>Future Controls measures to be confirmed.</p>	5	4	20

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	<p>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.</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 initiated.</p> <p>Ongoing implementation of audit recommendations.</p> <p>Renewing Croydon Task &amp; Finish Group initiated.</p> <p>Work streams in place to identify cost savings and demand management processes.</p>	5	4	20	Future Controls measures to be confirmed.	5	4	20

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>Continuous horizon scan review of national and global events / trends.</p> <p>Effective risk recording / reporting 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>Rapidity of escalation to ELT amended to achieve desired outcome.</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> <p>Robust corporate Risk Management Framework in place.</p>	5	4	20	Provision of risk management training to officers and members to be implemented April 2021.	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
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 substantially 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> <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. his 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	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. (May 2021)</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
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>Enhanced review of data recording in place to identify appropriate strategies to mitigate.</p> <p>Establishment data corrected within My Resources.</p> <p>Review of existing data recording practices / processes to ensure accuracy.</p> <p>Work stream initiated to ensure activities are appropriate.</p>	5	4	20	Subject experts to be engaged to workflow current practices and identify control weaknesses (March 2021).	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>Best practice identification activities in place.</p> <p>Finance Review Programme initiated.</p> <p>Ongoing Cabinet and ELT reviews.</p> <p>Ongoing monitoring and strategy identification.</p> <p>Quarterly review and scrutiny.</p> <p>Review of existing expenditure / work streams to identify cost reductions.</p> <p>Specific work stream initiated to identify capital programmes that can be decommissioned.</p>	5	4	20	<p>Future Controls measures to be confirmed.</p>	5	4	20

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 / targets.</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> <p>New ways to utilise properties to secure longer term security being investigated.</p> <p>Revised Corporate Asset Strategy in place to help focus resources in the most appropriate way. The effectiveness of this strategy is dependent on result of Capitalisation Directive award from MHCLG.</p> <p>Spending strategy stopped with immediate effect for any more investment purchases.</p>	4	5	20	<p>Future Controls measures to be confirmed.</p>	4	5	20

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 statutory obligations 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>Commissioning of fire safety works is prioritised over other HRA work streams.</p> <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>	5	4	20	Future Controls measures to be confirmed.	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
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. 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>	<p>Mustafa, Shifa</p> <p>Place Department</p>	<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>Consultation with all interested parties, including major land holders.</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>Preparation underway of a new Indemnity Land Transfer Agreement (ILTA) that reflects the current circumstances.</p> <p>Projects will need to be reprofiled within the Growth Zone to later years.</p> <p>Refusal to issue Notice of Entries (NoEs).</p>	4	5	20	<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. (Completion financial year 2021/22).</p> <p>The Council introduces a new development partner currently at a sensitive and end stage negotiations. (Completion financial year 2021/22).</p> <p>The Council seeks to introduce a new development partner, once the ILTA expires (July 2021).</p> <p>The creation of a Town Centre Board or Town Team with a ToR to maintain vitality and vibrancy in the town centre consisting of key stakeholders who can collaborate and bring resources and influence (April 2021).</p> <p>The preparation of a new Indemnity Land Transfer Agreement (ILTA) that reflects the current circumstances. (Completion financial year 2021/22).</p>	4	4	16

Risk Scenario		Current			Future Risk Rating						
Risk Ref	Risk	Impact	Exec Director	Existing Controls	Impact	L'hood	Total	Future Controls	Impact	L'hood	Total
				<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 is actively seeking to facilitate CLP to deliver a robust management strategy to maintain footfall. The Council seeks to facilitate CLP to deliver a robust management strategy to maintain footfall.</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> <p>Withdrawing Notice to Treat (NTT).</p>							