

## Appendix 1: Corporate Risk Register: Red Risks June 2021

Risk Ref	Risk Scenario		Assigned To	Current			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>Risk Raised 19/12/2019</p> <p>Reviewed ELT 18/5/2021</p> <p>**The voluntary structure of the scheme means there is always vulnerability. Croydon is responsible for all new children under 16 presenting to Lunar House as a locally based service**.</p> <p>Grant Thornton - 'Report in the Public Interest' recommendation number(s): 6 &amp; 7</p>	<ul style="list-style-type: none"> <li>As a result of the location of Lunar House in the borough Croydon has over three times the national voluntary ceiling of 0.07% of the child population accommodated as UASC</li> <li>Over 57% of the care leavers cohort were previously UASC</li> <li>Support and care for UASC cannot be absorbed into the existing staffing structure and placement budgets like in other Councils</li> <li>Pressure on placement supply of in-house and independent foster carers, and pressures on school places and LAC health services.</li> <li>Savings of over £4million per annum over the MTFS required to close the forecast budget gap</li> <li>Significant impact on the council's ability to discharge its statutory duties to all children and families in Croydon; to provide help and protection to children in need and safe effective services to all children in care and care leavers</li> <li>Legislative action.</li> </ul>	Jones, Debbie	5	5	25	5	4	20

## Existing Controls

- Working with the Home Office to ensure that Adult Asylum Seekers are not placed in Croydon -
- Agreement that 21 children placed by LBC in other London Boroughs are accepted as children in their care with service provision and financial responsibility transferring to the host borough
- 24 London Boroughs agreed to accept newly-arrived under-16s under an extended Pan London Rota for a 3 month period while negotiations with central government on a long term sustainable solution for LBC continue.
- The Home Office to second the Age Assessment Team and meet the costs of the duty team for 12 months with effect from June 2021, relieving a total of £594,000 of revenue costs in 21/22
- 29 Human Rights Assessments completed since December 2020 to inform the safe removal services to care leavers who have exhausted their immigration appeal rights.
- NTS transferred a small number of children presenting at Lunar House to other LAs
- Virtual immigration interview offered by Home Office to prioritise immigration applications of Croydon UASC to enable access to public funds and employment
- Regular updates to GPAC and cabinet on progress against the RIPI actions on UASC
- Challenge raised with the Home Office on placing young people in Croydon assessed on arrival in Kent as adults where a challenge to the age assessment results in a requirement on Croydon to accommodate as children
- Report to cabinet in June 2021 to set out the issues and risks based on forensic modelling

## Future Controls

- Future Controls • Further liaison with Kent CC and Portsmouth on the preparation of legal advice to suspend statutory duties and cease to accept newly arrived children. (Oct 2021 review)
- Development of advice based upon detailed analysis of the specific issues in Croydon (Oct 2021 review)
- Development of options to inform member decisions on further action to address the risks to the ability to discharge statutory responsibilities to all children and families in need of help and support (Oct 2021 review)

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
FIR0023  Buss, Chris	Further deterioration in Internal Control & Governance as a result of budget and resourcing constraints in the organisation.  Reviewed ELT 18/05/21.  (Risk generated 26/02/2020).	<ul style="list-style-type: none"> <li>Financial / Reputational and Legal implications arising from bad decision making.</li> <li>Poor data control leading to lack of financial control</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>	Buss, Chris	5	5	25	5	3	15

**Existing Controls**

- Committee Award process for contracts. -
- Commissioning & Procurement Framework in place and enforced. -
- Higher profile of key policies and procedures and easier access to support and guidance. -
- Robust Internal Audit Programme in place. -
- Spend Control Panel -Medium Term Financial Strategy
- Work of Steering Board (Exec Directors and Directors).
- Financial Procedures Reviewed
- Monthly Budget Monitoring
- PMO monitoring of adherence and delivery of Renewal Plan
- Strategy implemented to raise profile of Governance / Internal Audit function to ensure appropriate adherence -at all levels across organisation.
- Tendering Made Easy - web based guide produced to assist with compliance. -

**Future Controls**

- Finance systems including 'My Resources' and 'My Finance' to be reviewed October 2021.
- Internal review of the current internal governance structures being conducted by Executive Leadership Team . (Completion October 2021).
- Review by Section 151 officer of the skills and capability and structure of Finance function : July 2021
- Review of training offer by L&OD to ensure provision of 'fit for purpose' support to all employees. December 2021.

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
FIR0034  Buss, Chris	<p>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.</p> <p>**The final balance of the 2019/20 and 2020/21 accounts does not achieve the required level of financial stability**.</p> <p>Risk reviewed ELT 18/05/2021.</p> <p>Reviewed at DLT 2/6/2021.</p> <p>(Risk generated 22/02/2021).</p>	<ul style="list-style-type: none"> <li>• Qualified accounts provided in respect of 2019/20.</li> <li>• Loss of control of financial position</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>	Buss, Chris	5	5	25	5	5	25

**Existing Controls**

- Regular meetings with Grant Thornton and corporate finance team to monitor progress of audit -

**Future Controls**

- Additional resources in corporate finance to support increased support and oversight of the accounts. This work to be driven by the Section 151 officer review of the Finance function and the effective use of 'My Resources' and 'My Finance' July 2021

- Audit review of Brick by Brick and Fairfield Halls contract/accounting treatment with Grant Thornton and corporate finance team June 2021

- Specific use of transformation funding in relation to 19/20 and 20/21 being audited by Grant Thornton in consultation with corporate finance team June 2021.

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
FIR0035 Buss, Chris	<p>In respect of the 2022/23 financial year the additional £63m savings as set out by MHCLG in the Capitalisation Direction Agreement (2021) are not identified and delivered.</p> <p>**The Council would therefore not be able to 'balance budget' also leading to the refusal for the further £25m loan as part of the final Capitalisation Direction Agreement.**</p> <p>Reviewed ELT 18/05/2021.</p> <p>Reviewed at DLT 2/6/2021.</p> <p>(Risk generated 22/02/2021).</p>	<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> <li>• Not balancing 22/23 budget.</li> </ul>	Buss, Chris	5	5	25	5	5	25

**Existing Controls**

- Corporate finance working with services to identify further savings for 2022/23. -
- MHCLG Improvement & Assurance Panel. -
- Review and revision of budget setting process and meetings being conducted by Section 151 officer. -
- Steering board made up of ELT and Directors to oversee the strategy to achieve the additional savings targets established . -

**Future Controls**

- Public consultation activity. October 2021.
- Renewal plan to be reviewed October 2021.

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
FIR0036 Buss, Chris	<p>Robust governance &amp; risk management procedures/frameworks are not activated to safeguard the interests (financial &amp; reputational) of the Council and it's 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> <p>Reviewed at ELT 18/5/2021.</p> <p>Reviewed at DLT 2/6/2021.</p> <p>(Risk generated (26/02/2021)</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>	Buss, Chris	5	5	25	5	3	15

**Existing Controls**

- Annual business plan of BXB reported to Cabinet. -
- Cabinet member responsibility in portfolio. -
- Dedicated shareholder function in place to manage relationship and risks. -
- LBC non-executive directors allocated to serve on all subsidiary Boards. -
- PwC Review of the transparency of reporting of any remedial action taken to address in year overspends. -
- Shareholder Board created September 2019. -
- Shareholder boards established specifically for Brick by Brick -and secondly for all other external companies feeding into the working group for council companies to report as part of the renewal plan delivery October 2021
- Strategic review recommendations agreed to reduce risks and deliver secure financial path forward. -

**Future Controls**

- Formally identify Shareholder Representative responsibilities and take appropriate action following review. (September 2021).
- Proposal / strategy to be presented to Members (Cabinet Sub-Committee June 2021).

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
FIR0041  Buss, Chris	<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> <p>Reviewed ELT 18/05/2021.</p> <p>Reviewed at DLT 2/6/2021.</p> <p>(Risk generated 22/10/2020).</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> <li>• Non delivery of in year savings</li> </ul>	Buss, Chris	5	5	25	5	3	15

**Existing Controls**

- CLT co-ordination to identify and instigate savings strategies. -
- Collaborative working with MHCLG Improvement & Assurance Panel. -
- Finance Consultant issued report into improving finance system. -
- Immediate spending controls implemented across the Council. -Recruitment; PCards; Expenditure control greater than £10k (Purchase Orders).
- Introduced non-essential spend and recruitment controls as if s. 114 notice issued. -
- Leader, Cabinet Member for Finance & Resources and the Chair of General Purposes & Audit Committee - attended LGA Training 07/11/2020.
- Monthly reporting to ELT / Cabinet. -
- Proper management of purchase orders to ensure compliance with corporate policy to eliminate retrospective activity. -
- Rapid review completed to highlight issues. -
- Spending Control Panel in place monitoring and approving all expenditure across the Council. -

**Future Controls**

- Outcome of forensic audit to be considered. (June 2021).
- Review of 'My Finance' and 'My Resources' systems: October 2021
- Review of scheme of delegation and constitution in conjunction with Monitoring Officer October 2021.
- Training programmes to be introduced to improve General Purposes & Audit Committee (GPAC) and Scrutiny Committees. Planned training programme ongoing / continuous through financial year 2021/22.

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
PH0001  Flowers,Rachel	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.  Reviewed ELT 18/05/2021.  (Risk generated (23/3/20)	<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>	Flowers,Rachel	5	5	25	5	3	15

#### Existing Controls

- Activation of LBC GOLD and SILVER national standard Emergency Planning meetings. -
- BECC activated 16th March 2020. -
- Council GOLD meeting weekly to monitor and review situation. -
- 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.
- Excess Death Scenario 'Task & Finish Group' participation. -
- LSP of all Croydon parties regularly briefed. -
- Ongoing collaborative working with Corporate Resilience Team to ensure -regular review and update of Council's Pandemic Plan.
- Part of the PAN LONDON network (DPH's). -

#### Future Controls

- Achievement of coverage for all age categories under the mass vaccination programme. Anticipated completion August 2021.
- Mass vaccination programme ongoing. (August 2021).
- Surge Testing as and when required.

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
VRN0003  Tate, Stephen	<p>A rise in domestic abuse in the borough resulting in greater numbers of murders and serious harm.</p> <p>Referrals February 2021: 66 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> <p>Reviewed ELT 18/05/2021.</p> <p>(Risk generated 25/06/2018).</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>	Tate, Stephen	5	5	25	5	3	15

#### Existing Controls

- 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.
- Action plans for Safer Croydon Partnership. -
- Action plans for the Council's Domestic Abuse Support Service (DASS). -
- Active management of workloads and pressures on staff. -
- Commissioning of DRIVE service provider. -
- Contingency location identified if move is delayed. -
- Crime & Disorder Reduction Strategy. -
- Family Justice Centre -Advocates for domestic abuse sufferers. White Ribbon Borough and petition.
- FJC team working with victims and putting in place new advocacy measures -
- MARAC and DAPP processes in place. -Occurring weekly to manage increased referral volume.
- Plans in place for prevention and support -
- Presented to GPAC for full review and scrutiny 26/04/2021. -
- The Council's domestic violence conducts annual refresh of their own specific strategy and work programme -
- The work of the Family Justice Centre. -
- Working with the Police and other public agencies to increase referrals. -

#### Future Controls

- 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).
- Domestic Homicide Review findings pending following statutory review. Spring/Summer 2021
- 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 . (Spring / Summer 2021).

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
ASC0016  McPartland, Annette	<p>Social Care Funding and pathway for eligible 'Continuing Health Care' and 'Joint Funding' demand led pressures increases significantly the financial commitment that the Council must provide without additional contributions from our health partners.</p> <p><b>**negotiation and involvement with partner organisations to facilitate appropriate division of funding pathways accountability**.</b></p> <p>Reviewed ELT 18/05/2021.</p> <p>(Risk generated 01/03/2021)</p>	<ul style="list-style-type: none"> <li>• The Council retains the cost of care that should be either fully or joint funded by NHS / CCG.</li> <li>• Service and budget pressures due to national and regional agreed protocols and frameworks not being adhered to by our partners.</li> <li>• Significant financial implications for the Council.</li> <li>• Clients left without appropriately funded care and expert health input.</li> <li>• Clients having to make contributions towards cost of care when they are entitled to NHS funded care.</li> </ul>	Baxter, Caroline	5	4	20	5	3	15

#### Existing Controls

- Director of Adult Social Care / CCG Lead for CHC (Elaine Clancy) set up Task & Finish Group -looking at the management of the CHC going forward.
- Implementation and review of protocols and agreements for Children and young Adults . -
- Overarching protocol and agreement in operation with Council attendance at CHC panels. -All partners must adhere to agreed protocols, timeframes and dispute resolutions.
- Working with South West London Partnership (5 borough's) CCG in order to develop standardised protocols and policies. -

#### Future Controls

- Dedicating staff time to track CHC payments and provide consistent Council presence at CHC . (Commence June 2021).
- Develop escalation method. (September 2021).

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
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> <p>**collaboration and involvement of Children's Social Care to facilitate the transition into adult social care environment, transition work to commence at 14+.**</p> <p>Reviewed 18/05/2021.</p> <p>(Risk generated 04/09/2018)</p>	<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>	McPartland, Annette	4	5	20	4	5	20

#### Existing Controls

- 1 year forecast of service users transitioning at year end. -
- 3 year forecast of service users transitioning. -
- 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 .
- Complex care team intervention through high cost placement review. -
- Current protocols require transition with stable placement or care package -and thereby reducing the requirement for urgent intervention.
- Developing and improving the local service offers for supported accommodation , active lives and employment. -
- Forecasting used to develop growth bids and inform budget build. -
- High value placements and care packages are selected for reassessment - by Complex Care Team as part of the high cost placement reviews .
- MHCLG Improvement & Assurance Panel. -
- Provision of a comprehensive service offer for accommodation , active lives and employment. -

#### Future Controls

- Adult Social Care savings plans being developed. (September 2021).

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CDS0018  Williams, Neil	Confidentiality, integrity or availability of LBC ICT systems is compromised by either a:  <ul style="list-style-type: none"> <li>• cyber-attack;</li> <li>• misconfiguration;</li> <li>• malware;</li> <li>• ransomware outbreak;</li> <li>• other malicious system breach; or</li> <li>• human error / non-compliance with GDPR.</li> </ul> Reviewed 25/05/2021 .  (Risk generated 09/03/2021).	<ul style="list-style-type: none"> <li>• LBC ICT systems become unavailable or unresponsive, resulting in critical business functions being adversely impacted for significant period of time.</li> <li>• LBC would incur costs in containment and recovery.</li> <li>• Breach of confidentiality, integrity and availability of sensitive data (including personal data, sensitive personal data and business critical data).</li> </ul>	Williams, Neil	5	4	20	4	3	12

**Existing Controls**

- Improve security collaboration & knowledge sharing (including 3rd party suppliers and partners). -Currently working with Capita to obtain critical infrastructure information to review and share security vulnerabilities. (Commenced January 2021).
- Business continuity plans in place for loss of essential services helps minimise disruption. -
- Identity and access management improvements implemented. -
- Improve identity and access management (AD clean up) — ongoing since Mar 2020, expected to complete Dec 2021.
- Migration of key infrastructure from legacy datacentre to cloud. -(completed May 2021).
- New cybersecurity initiative & team operating. -
- On-going review & assessment of toolsets & configuration of current software. -
- User awareness training and communication. -

**Future Controls**

- Implement regular vulnerability scanning, technical compliance checks and remediation. (June 2021).
- Better define security roles & responsibilities, in particular between 3rd party suppliers and internal teams. Currently negotiating cyber support & tooling contracts and defining support roles with vendors regarding O365/Azure management. (Oct 2021)
- Continue to improve & test back-up & recovery processes. Review Oct 2021
- Council-wide mandatory awareness training and communication. (go live expected end June 2021).
- Enhance system and environment lifecycle & decommissioning processes – project starts July 2021 (project starts July 2021).
- Enhance system and environment lifecycle & decommissioning processes. Data centre exit is nearing completion, process and decommissioning are being defined/finalised.
- Expansion of vendor risk assessment and management process.
- Implement security-by-design approach.
- Project to revise IT business continuity plans and improve & rigorously test back-up & recovery processes – Q3 2021/2.
- Review & reconfigure current "core" software & toolsets (MS Suite) – pending O365 upgrade, target Q4 2021/2.

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
CEHR0071  Moorman, Sue	<p>Organisational behaviours, culture and practices lead to the Council being unable to operate effectively and therefore not serve the residents of the borough in accordance with their expectations.</p> <p>Grant Thornton - 'Report in the Public Interest' recommendation number(s): 1-20.</p> <p>Reviewed at ELT 18/5//2021.</p> <p>(Risk generated 28/10/2020).</p>	<ul style="list-style-type: none"> <li>Increasing and uncontrollable financial loss.</li> <li>Legislative action due to non-compliance with statutory obligations.</li> <li>Workforce behaviours critically damage the organisation.</li> <li>Political scrutiny and interest at local and national level.</li> <li>Media interest at local and national level.</li> <li>Staff morale decreased.</li> <li>Continuing and increasing reputational damage.</li> <li>Government intervention.</li> </ul>	Moorman, Sue	5	4	20	5	4	20

#### Existing Controls

- Corporate behaviours and ways of working are core elements -to job descriptions and new performance management system.
- Dedicated Learning & Organisational Development Team supporting culture change -as a key element to Croydon Renewal Plan with core expectations on compliance and accountability.
- Detailed policies and procedures in place and reviewed by relevant accountable officer / team regularly. -
- Executive Director Assurance Statements provided annually. -
- Governance Framework in place which is modelled on the CIPFA / SOLACE methodology. -
- Internal Audit Programme developed and delivered each financial year. -
- Ongoing engagement with staff. -
- Refreshed manager and staff behaviours and mandatory core training -including good governance and accountability framework schemes to ensure the Council maintains up to date and relevant adherence to legal requirements and initiatives as they relate to organisational best practice and workforce development and enhancement.
- Risk Management Framework in place. -

#### Future Controls

- Health & Wellbeing Programme being refreshed and launched (summer 2021).
- Introduction of 360 degree review and performance management system. (2023).
- Re-Induction of all managers focus on accountability . (financial year 2021/22).

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
CFES0001  Jones, Debbie	<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> <p>Reviewed ELT 18/05/2021.</p> <p>(Risk generated 05/10/2020).</p>	<ul style="list-style-type: none"> <li>Continuing financial loss.</li> <li>If spend is not within budget MHCLG have reserved the right to appoint commissioners.</li> <li>Political scrutiny.</li> <li>Reputational damage.</li> <li>Further savings required impacting on the council's ability to discharge statutory duties to all children and families</li> <li>Legislative action.</li> </ul>	Jones, Debbie	5	4	20	5	4	20

#### Existing Controls

- Finance Review Programme completed and recommendations being acted on. -
- Children's Delivery Plan to set out the actions required to reduce spend towards the London average scrutinised at the Improvement and Assurance Panel .
- Monthly meetings scheduled to check progress against the plan from 23/04/21.
- Implications of the MTFS savings on practice reviewed monthly at the Children's Continuous Improvement Board
- Individual savings projects reviewed and challenged at DLT against a forward plan

#### Future Controls

- The Corporate Finance, Performance and Risk report will provide an update on improvement actions of the Council including:
- The Corporate Finance, Performance and Risk report will provide an update on improvement actions across the Council including Children's (Review Oct 2021)
- DFE commissioned Financial Adviser to provide additional challenge and capacity to improve the accuracy and reliability of financial analyses (Review Oct 2021)

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
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> <ul style="list-style-type: none"> <li>•The overall DSG deficit position as at the end of 2019/20 financial was £14.558m. This deficit is against all four funding blocks of the DSG allocation and includes the cumulative overspend on the High Needs element of the DSG of £18.5m as at year end 2019/20.</li> <li>•The current in-year High Needs overspend forecast as at 31 January 2021 (Period 10) is £4.472m. The forecast position for this year has remained stable and improved slightly by approximately £88k from £4.560m as at 30 September 2020 (Quarter 2) to £4.472m at Period 10.</li> <li>•This represents progress as this level and records a positive downward trend. This is in part due to the impact of planned approaches as well as due diligence and focus on budget management.</li> </ul> <p>Reviewed ELT 18/05/2021.</p> <p>Risk created 17/9/2019.</p> <p>TO NOTE.....The School and Early Years Finance (England) Regulations 2020 establish 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> <p>(Risk generated 27/06/2017).</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> <li>• Specialist placement pressures may result in young people with profound disabilities requiring provision out of borough at additional cost to the Council.</li> </ul>	Davies, Shelley	5	4	20	5	3	15

#### Existing Controls

- 0-25 SEND Strategy Implementation Plan to deliver change across the system. -
- Addington Valley Academy Free School opened in temporary site for Year 7 (September 2020). -
- 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.
- 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.
- DSG Recovery Plan (balanced budget 2024/25) approved by Schools forum. -
- 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.
- Free School opened which will relieve pressure in spend in non-mainstream sector. -
- Further senior management review of existing plans. -
- Graduated response – right support, right time. -Meeting needs locally in local schools at SEN Support level; reduced reliance on alternative education.
- High Needs Funding Review planned. -
- Implement strategies for managing demand for more effective mainstream school placements. -
- Implementation of joint working with other local authorities to reduce placement costs. -South London dynamic purchasing system ( SL DPS).

- Improved forecasting and reporting of demand led spend to manage overall budget position. -
- Improved projections for school places. -
- 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.
- July 2019 -5 yr deficit recovery plan submitted to DfE.
- Modelling of Locality Based Working - & Staged Approach supporting mainstream schools meeting SEN needs .
- 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).
- Post 16 specialist placements provision created at Coulsdon College for pupils in Sept 2019. -
- 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.
- South London Partnership SEN Commissioning Programme in place -for commissioning residential and day placements for children and young people with Special Education Needs.
- Utilised the additional funding allocated in the 2019 'Spending Review'. -

#### **Future Controls**

- Addington Valley Free School will open on substantive site for all year groups (September 2021).

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
ED0002  Davies, Shelley	That a 'Local Area (OFSTED) Inspection' issue a letter detailing improvement requirements / concerns in respect of the SEND Service.  **The Education Directorate is coordinating the Council's approach but the responsibility is jointly shared by Education, Health & Children's Social Care and the local CCG / NHS Trust**  Reviewed ELT 18/05/2021.  (Risk generated 05/01/2018).	<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>	Davies, Shelley	4	5	20	4	5	20

#### Existing Controls

- Governance structure introduced to oversee delivery and implementation of the Improvement Strategy. -
- 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.
- Implementation of revised 0-25 SEND strategy. -
- SEN Improvement Board established & meeting monthly to monitor SEN improvement plan and strategy. -
- SEND Inspection Readiness Working Group set up September 2020. -

#### Future Controls

- A refreshed SEND strategy for the academic year 2022/ 23 being developed in partnership with education, health and social care as well as families and CYP with special educational needs and disabilities . (Summer 2022)

Risk Ref	Risk Scenario		Assigned To	Current			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><b>**Currently there are 10 of our 50 maintained schools in deficit**.</b></p> <p>Reviewed ELT 18/05/2021.</p> <p>(Risk generated 08/08/2017).</p>	<p>• Financial loss to LBC as the Council holds liability to settle deficit should schools transfer to academy status.</p>	Davies, Shelley	4	5	20	4	5	20

**Existing Controls**

- 'Schools of concern' are under monthly review. -
- Deficit schools report financial outturn monthly to LBC. -
- 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.
- Oversight of any significant deficit reporting as a result of C19 in place. -
- Regular update meetings with the Governing Body's / SLT's of schools with the highest levels of debt. -
- Risk rating system is in place for each of the schools that are either in deficit or 'causing concern'. -
- Schools are met with by senior finance and education officers -to discuss their deficit and their action plan for setting a balanced budget in the future.
- Schools are requested to set a licence deficit plan – -this includes a 3 year budget plan as to how the school will return to a balanced position.
- 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 .
- 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.

**Future Controls**

- School Resource Management Advisor to target meetings with additional school leadership teams and Chair of Governors to review deficit action plans during the start of Autumn term and provide advice to bring budgets in line

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
EHSCSC0017  Madden, Roisin	Gaps in Statutory Social Work Capacity - Croydon Supporting Families ( Assessment ) and Social Work with Families ( CP/CIN/ Court work )  Risk generated 1/6/2021	Caseloads above acceptable levels reducing the quality and timeliness of social work assessments and interventions; increased demand on statutory services through either repeat assessments or the need to intervene through a child in need or child protection plan. Rising costs as more complex interventions are required for children and increased demand on services. Ofsted evaluation of practice impacting on the reputation of the council, impacting on retention and recruitment.	Madden, Roisin	5	4	20	5	4	20

**Existing Controls**

- Recruitment of temporary staff through Adecco -Increasing the rate of pay for temporary staff – encouraging current staff to move to services with greatest need – increasing permanent recruitment activity

**Future Controls**

- Widening our agency recruitment options through additional specific contracts with providers Instructing staff to work in alternative areas in response to increased capacity pressures . Review Oct 2021

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
FIR0040  Buss, Chris	Ineffective management of identified risk leads to organisational failure .  Grant Thornton - 'Report in the Public Interest' recommendation number(s):1-20.  Reviewed ELT 18/05/2021.  Reviewed at DLT 2/6/2021.  (Risk generated 23/03/2020).	<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> <li>• Regulator criticism.</li> </ul>	Buss, Chris	5	4	20	5	4	20

**Existing Controls**

- Continuous horizon scan review of national and global events / trends . -
- 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.
- Frequency of management oversight of risk register has increased at a senior level in line with demand. -
- Rapidity of escalation to ELT amended to achieve desired outcome . -
- Risk is standing item on regular ELT risk reviews . -
- Risk Register utilised as a framework for review and therefore included as a standing item on GOLD Agenda . -
- Risk Team form part of core organisational groups . -
- Robust corporate Risk Management Framework in place. -

**Future Controls**

- Further provision of risk management training to Officers and Members to be implemented as the senior leadership team takes shape . Review Oct 2021

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
FIR0051 Buss, Chris	Risk of financial loss and reputational damage due to the poor performance of Brick By Brick including the Fairfield Halls refurbishment project  (Risk generated 19/05/2021).  Reviewed at DLT 2/6/2021.	<ul style="list-style-type: none"> <li>• Council is liable for the outstanding debt.</li> <li>• Political and media scrutiny and interest.</li> <li>• Financial loss on sale of BxB assets.</li> <li>• Loss of interest on loan payments</li> </ul>	Buss, Chris	5	4	20	5	4	20

**Existing Controls**

- Revised loan agreement to Brick by Brick (excluding Fairfield Halls) -  
Loan agreement setting down rights and obligations of parties.

Separate bank account established for accrued interest on loans provided by Council

Regular Operational meetings between company & Council and Shareholder board

**Future Controls**

- Additional Management support to be considered for Brick by Brick or sale of company (July 2021)

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HSI0011 Knight, Alison	The Council does not meet its statutory obligations for the delivery of the General Building Works and Mechanical upgrade works across the HRA estate.  Risk reviewed 4/6/21  (Risk generated 30/10/2020).	<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> </ul>	Knight, Alison	5	4	20	5	4	20

**Existing Controls**

- ARK external independent investigation completed May 2021 and actively implementing recommendations. - Tenants group considering implementation of White Paper 'Charter for social housing residents'
- Tenants/scrutiny panels established in conjunction with housing function
- Residents panel established for the Regina Road meeting twice weekly
- Priority to ensure all key safety areas are being covered focusing on the gas, electricity, fire, lifts, legionella and asbestos checks
- Clear KPIs in situ
- Rigorous review of maintenance contract and contract management
- Actively working with Regulator for Social Housing to ensure correct approaches being taken
- Door-to-door checks with residents implemented

**Future Controls**

- Develop better systems for recording maintenance requests / tenant complaints. September 21
- Condition survey on seven high priority blocks due to be delivered July 2021
- Detailed improvement plan being developed July 2021
- Review of resident engagement and improvement board to be established August 2021
- Overarching HRA business plan to be developed and published target date January 2022

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HSI0017  Knight, Alison	<p>Major increase in disrepair cases raised under the disrepair protocol and as a result of The Homes (Fitness for Human Habitation) Act 2018.</p> <p>**Act requires landlords to ensure that homes are fit for human habitation and is the most significant change in the law relating to housing conditions since the Housing Act 2004. The first phase of these provisions came into force in March 2019 and new tenancies granted since then have been subject to the new legislation.**</p> <p>(Risk generated 13/05/2021).</p>	<p>Currently disrepair claims are brought in accordance with the well-established 'pre-action protocol for disrepair claims'. An increase in repair claims which could be driven by:</p> <ul style="list-style-type: none"> <li>• Increased awareness of the ability to claim and to get compensation driven in part by targeted and aggressive advertising and social media campaigns by law firms and claims companies.</li> <li>• The cut to legal aid, as a result a number of law firms have change tactics to increase their revenue by concentrating resources into disrepair cases and we have seen an increase in solicitors door knocking and reported two firms to the Bar Council.</li> <li>• The Homes (Fitness for Human Habitation) Act 2018 which came into effect April 2019.</li> <li>• Cases where we have not due to other maintenance priorities addressed problems with the external fabric of our buildings. This requires an ongoing programme to address rendering failures, DPC, Cavity insulation and roofing renewal.</li> </ul> <p>There has been a significant increase in disrepair cases in the last year and in costs. Claims are predominantly (around 95%) related to damp and mould.</p>	Knight, Alison	5	4	20	4	4	16

**Existing Controls**

- Analysis of the disrepair cases in the last year that has -changed the process that has been in place with maintenance contractor to ensure all reports of damp are inspected and that we separate the issues of dampness vs those caused by ongoing leaks.
- Disrepair cases are managed by the Disrepair surveyor and supported by the Senior surveyor (this post is vacant) - and Technical Manager in the Technical Team . Approval to appoint an agency disrepair surveyor for a period of 12 months granted

**Future Controls**

- Resources for disrepair work are being urgently reviewed as part of reorganisation of the service,(Completion summer 2021).
- Review use of fans and monitors with Asset management to increase use of emerging damp monitoring technology and industry improvements . (Summer 2021).

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
PH0007  Flowers,Rachel	<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> <p>Reviewed ELT 18/05/2021.</p> <p>(Risk generated 24/03/2020).</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>	Flowers,Rachel	5	4	20	5	2	10

**Existing Controls**

- Targeted comm's and engagement to the 'at risk' populations / vaccination uptake work included. -
- Council wide Inequalities programmes including Local Strategic Partnerships (LSP). -
- COVID-19 and flu messaging detailed in the NHS Health Check invitation letter sent to people aged 40-74. -
- 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.
- Director of PH is Regional Lead for London (ASC) and briefing LSP / ELT / GOLD on epidemiology -and control measures.
- Epidemiology data provided by DHSC and LCRC reviewed by PH Team on a daily basis to enhance understanding . -
- Free school meal vouchers. -
- Good engagement across borough with C19 Health Protection Board that provides oversight -to the Outbreak Control Plan.
- Lower level risks discussed on regular basis at SILVER and escalated where necessary . -
- 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 .
- Ward level Power BI dashboard analyses data at a local level . -

**Future Controls**

- Achievement of coverage for all age categories under the mass vaccination programme. Anticipated completion August 2021.

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PP0009  Handford, Gavin	<p>Corporate financial savings objective is not achieved due to poor programme &amp; project management behaviours.</p> <p>Reviewed ELT 18/05/2021.</p> <p>(Risk generated 01/06/2020).</p>	<ul style="list-style-type: none"> <li>• Non delivery of savings plan.</li> <li>• Council budget deficit remains.</li> <li>• Political scrutiny as to why project failed.</li> <li>• Senior officer resignations.</li> <li>• Loss of staff through inability to maintain payroll commitments, low morale, poor service delivery.</li> <li>• Injury to staff and clients through lack of financial support.</li> <li>• Non-achievement of statutory requirements / duties.</li> <li>• Media interest.</li> </ul>	Handford, Gavin	5	4	20	5	3	15

#### Existing Controls

- Effective Governance Framework implemented to ensure compliance with PM Framework -and all related corporate policies and procedures.
- Programme initiated to coordinate and deliver related project streams - to ensure effective budget savings identified and strategies implemented to deliver .
- Programme Plan in place to ensure achievement of identified objectives. -

#### Future Controls

- Review of programme outcomes conducted at each stage boundary to ensure compliance with required objectives. CPMO monitor activities for foreseeable future (October 2021).

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
PR0028  Iles, Steve	<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> <p>Reviewed ELT 18/05/2021.</p> <p>(Risk generated 30/10/20)</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>	Wingrave, Stephen	4	5	20	4	4	16

**Existing Controls**

- Clear and agreed (Scrutiny & Cabinet) strategy in place. -Strategy incorporates CIPFA recommendations.
- Monthly Finance Reports to Cabinet. -
- New ways to utilise properties to secure longer term security being investigated. -
- 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 .
- Spending strategy stopped with immediate effect for any more investment purchases . -
- The Asset investment strategy is included within the Asset Management Plan -ensuring proper governance which will include regular quarterly reporting to effectively monitor any impacts .

**Future Controls**

- Croydon Park Hotel is due to be marketed and sold (pending suitable offers) during summer / autumn 2021.

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PST0001  Cheesbrough, Heather	The Whitgift Centre is not redeveloped as anticipated.  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.  Reviewed ELT 18/05/2021  (Risk generated 18/05/2015).	<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>	Cheesbrough, Heather	4	5	20	4	4	16

#### Existing Controls

- A robust Meanwhile and Management Strategy to maintain footfall . -
- Communication channels between politicians and officers kept cordial and relationship maintained with CLP to optimise influence . -
- Consultation with all interested parties, including major land holders. -
- 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 .
- Preparation underway of a new Indemnity Land Transfer Agreement (ILTA) that reflects the current circumstances. -
- Projects will need to be reprofiled within the Growth Zone to later years. -
- Refusal to issue Notice of Entries (NoEs). -
- Regular meetings with CLP to maintain dialogue between partners . -Robust discussion through planning pre-application process.
- Relevant Officers / Politicians meet every six weeks under Clause 11 meetings schedule and criteria. -
- Robust discussion through planning pre application process for any new application. -
- 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 .
- The Council through its statutory powers - Local Planning Authority (LPA), CPO and land assembly, and as a Highway Authority. -
- 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.
- Withdrawing Notice to Treat (NTT). -

#### Future Controls

- 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).
- The Council seeks to introduce a new development partner, once the ILTA expires (February 2026).
- The preparation of a new Indemnity Land Transfer Agreement (ILTA) that reflects the current circumstances. (Completion financial year 2025/26).

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
RCS0025  Hussain, Asmat	Performance data provided via some corporate systems and processes is inaccurate and incomplete.  Reviewed ELT 18/05/2021.  Risk generated 01/06/2020.	<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>	Hussain, Asmat	5	4	20	5	4	20

**Existing Controls**

- Data validation activities to ensure accuracy. -
- Enhanced review of data recording in place to identify appropriate strategies to mitigate. -
- Establishment data corrected within My Resources. -
- Ian O'Donnell engaged to deliver review and report. -
- Managers dashboards are available for key workforce information on MyResources. -
- Monthly finance reporting in place. -
- Performance framework aligned to Croydon renewal activated. -
- PMO activity to coordinated reporting. -
- Review of existing data recording practices / processes to ensure accuracy. -
- Workstream initiated to ensure activities are appropriate. -

**Future Controls**

- Subject experts to be engaged to workflow current practices and identify control weaknesses (Summer 2021).