

**LONDON BOROUGH OF CAMDEN**

**WARDS:** All

**REPORT TITLE:** Principal Risk Report 2024

**REPORT OF:** Executive Director Corporate Services

**FOR SUBMISSION TO:**  
Audit and Corporate Governance Committee

**DATE:**  
5 December 2024

**SUMMARY OF REPORT**

This report provides an update on the action being taken to mitigate key principal risks and presents the Council’s position as at October 2024. In line with Committee’s Terms of Reference, the purpose of the report is to enable the Committee to monitor the effective development and operation of risk management in the Council.

**Local Government Act 1972 – Access to Information**

No documents were used in the preparation of this report which are required to be listed.

**Contact Officer:**

Nasreen Khan  
Head of Internal Audit, Investigations and Risk Management  
5 Pancras Square  
London  
N1C 4AG  
Telephone: 020 7974 2211  
Email: [nasreen.khan@camden.gov.uk](mailto:nasreen.khan@camden.gov.uk)

**RECOMMENDATIONS**

- The Committee is asked to:
- 1) Note the Council’s principal risks and actions being taken to mitigate risks;
  - 2) Agree four areas for risk deep dives to be brought to two meetings in 2025.

Signed: As agreed by the Executive Director Corporate Services

Date: 20 November 2024

## 1. Purpose of Report

- 1.1 In accordance with its Terms of Reference, the Audit and Corporate Governance Committee (the Committee) is required to monitor the Council's effective development and operation of risk management. This report provides a comprehensive annual review of the Council's Principal Risk profile and presents the position as at October 2024.
- 1.2 Camden's Principal Risk Report is written in consultation with risk leads, Directorate Management Teams (DMTs) and the Camden Management Team (CMT). The risk manager has met with all risk leads to discuss the position of each risk, including reviewing current and target risk score and identify any new risks that require escalation to principal risk status.
- 1.3 This report highlights the main events and changes that have occurred since the last principal risk report in November 2023. Overall, the report details:
  - **Appendix 1: Principal Risk Map** – the heatmap diagram indicates the positioning of Principal Risks, detailing the likelihood and impact scores for each risk. The impact matrix details the risk scoring mechanism;
  - **Appendix 2: Risk Universe** – presents an overview of the risks by category, demonstrating our balance of risk;
  - **Appendix 3: How areas of risk link to 'We Make Camden'** – maps the links between risks and We Are Camden themes;
  - **Appendix 4: Executive Summary of the Principal Risks** – details the current as well as target risk score for each risk, defines the CMT risk lead and forward trend information;
  - **Appendix 5: Principal Risk detailed information and action plans (risk on a page)** - details the risk information and update alongside the action plan for each risk. The action plan details the actions that will be taken to achieve the target risk score;

## 2. Principal Risk Profile – Overview

- 2.1. Camden continues to operate in in a very challenging risk environment. Key themes include:

**i) Financial resilience of the Council:** The Government announced the Autumn Budget Statement on 30 October 2024. For local government, this includes a commitment to increase funding in the short-term through a real terms increase in core funding and additional resources for homelessness prevention, SEND and affordable housing. There are also welcome measures that will support financial resilience, including multi-year funding settlements and the reduction of right to buy discounts and local retention of right to buy receipts. Nonetheless, whilst the Budget acknowledged the pressures local authorities are experiencing, there remains significant ongoing budget pressures for 2025/26 across a number of services due to both demographic and inflationary pressures.

Against a continuing challenging environment, the Council is taking steps to protect its financial position, including agreeing a Medium-Term Financial Strategy to deliver significant savings to cover budget gaps in the medium term and a continuous review of reserves.

**ii) Financial pressures on residents:** Cost of living pressures continue to impact on residents leading to increased demand on Council services. The government announced a further six-months extension to the Household Support Fund (HSF) to the end of March 2025 which will support the Council's activities to support struggling residents. The number of people experiencing homelessness, or is at risk of homelessness, is increasing across London, including Camden.

**iii) Legislative and regulatory environment:** Significant legislative and regulatory changes require Councils to invest resources and adapt ways of working to achieve compliance. New inspection regimes on building safety, fire safety and for social housing landlords are being implemented. There are also new statutory requirements on public sector procurement coming into force in early 2025 which will significantly change working practices in this area. New legislation to keep members of the public safe from terrorist attacks in public spaces is currently going through parliamentary processes and will add new requirements on local authorities. Councils are operating in a complex compliance environment and need to ensure that there are adequate resources and skills in place to manage these challenges.

### **Overall risk exposure**

- 2.2. Principal risks articulate areas where the threat to the achievement of the Council's objectives is most significant. There are 30 principal risks in total, which reflects the level of risk exposure in relation to Camden's strategic objectives.
- 2.3. Camden's overall risk profile is reflective of the risk environment the Council is operating in, with high levels of uncertainty and pressure on local authorities nationally. The Council continues to operate in a heightened risk environment, with the majority of principal risks sitting outside of the agreed target score (20 risks of 30 in total).
- 2.4. Two new principal risks have been added in this iteration of the report ('Increasing Homelessness' and 'Complaints in Housing Repairs'). One principal risk has reduced in risk level since the last report ('Energy Costs') and one risk has an increased risk score ('Financial Resilience and Strategy'). Ten principal risks are assessed as having an increasing risk trend over the next 12 months.
- 2.5. Target risk scores included at **Appendix 4** demonstrate the risk level that the Council considers is within its risk appetite and that the organisation is working towards achieving or maintaining.

### **3. New principal risks**

- 3.1. Two new principal risks have been added, with details provided below.

3.2. **Risk title:** Increasing Homelessness

**Risk description:** Increasing number of people presenting as homeless put financial pressure on the Council due to expensive use of temporary accommodation.

**Rationale for adding:** All London authorities are seeing large increases in spend on temporary accommodation. Camden has a duty to secure temporary and emergency accommodation for certain homeless households in priority need under Part 7 of the Housing Act 1996. At the end of June 2024, the Council was providing temporary accommodation to 845 households of which 483 were families. Numbers in temporary accommodation has increased by 42% since the end of year 2022/23, resulting in significant budget pressures.

3.3. **Risk title:** Complaints in Housing Repairs

**Risk description:** Inefficient and non-compliant handling of complaints leads to escalation of cases and referrals to Housing Ombudsman

**Rationale for adding:** The number of complaints received by the Council has been increasing in recent years, primarily driven by a significant increase in repair complaints, for issues such as damp and mould. Between 1 April 2022 and 31 March 2023, there was a 100% increase in Stage 1 complaints (total 2,431 complaints) and the increase has continued during 2023/24. The Housing Ombudsman has been increasing their focus on local authorities, and there has been a 323% increase nationally in serious findings against social housing landlords regarding poor-quality services.

#### 4. Amended risk

4.1. The principal risk previously titled 'Cost of Living Crisis' has been re-articulated as set out below.

**Risk title:** Financial Resilience of Residents

**Risk Description:** Rise in the cost of living reinforces economic inequalities and significantly reduced economic wellbeing for residents.

**Rationale for amendments:** The risk was previously titled 'Cost of Living Crisis', reflecting the sharp increase in inflation and pressure on household finances in 2022-23. While the economy has stabilised, the higher costs remain, and the risk has been re-named to reflect the longer-term impact on Camden residents.

#### 5. Closed risks

5.1. No risks have been de-escalated from principal risk status in this corporate risk review.

#### 6. Major project and programme risks

6.1. We continue to monitor and review our major project risks within this report. Major project risks are detailed within **Appendix 5** either as individual risk items where large enough (for example 'Community Investment Programme' (CIP), 'High Speed 2 & Euston'), or under other risk headings, for example key Information Technology (IT) projects are detailed under 'Cyber and Data Security', and Chalcots project under 'Landlord Duty of Care'.

## 7. Principal risk deep dives

7.1. Risk deep dives are presented to the Committee bi-annually. The purpose of the deep dives is to make provision for the Committee to obtain an in-depth understanding of the risk area and provide the opportunity for Committee to hear directly from the risk lead. Deep dives were introduced in 2021-22, and areas previously presented to the Committee are outlined below:

Principal Risk	Risk score at the time of the deep dive	Date of deep dive
Financial Resilience and Strategy	20	December 2021
Cyber and Data Security	20	March 2022
HS2 and Euston	16	March 2022
Housing Revenue Account Financial Resilience	16	March 2023
Emergency Preparedness Response and Recovery	9	March 2023
Energy Costs	12	November 2023
HS2 and Euston	16	November 2023
Safeguarding Children	10	April 2024
Pressures in the Health System	12	April 2024
Financial Resilience of Residents	16	December 2024
Safeguarding Adults	16	February 2025 (scheduled)

7.2. The Committee is asked to agree four areas for deep dives in 2025. It is recommended that areas of greatest risk (risk scores 15 and above) and areas with an increasing forward trend, as listed in Appendix 4 below, are considered for future deep dives.

## 8. Finance Comments of the Executive Director Corporate Services

8.1. The Executive Director Corporate Services has been consulted and comments are incorporated within the body of the report.

## 9. Legal Comments of Borough Solicitor

9.1. The Borough Solicitor has been consulted on this report and has no comments to add.

## 10. Environmental implications

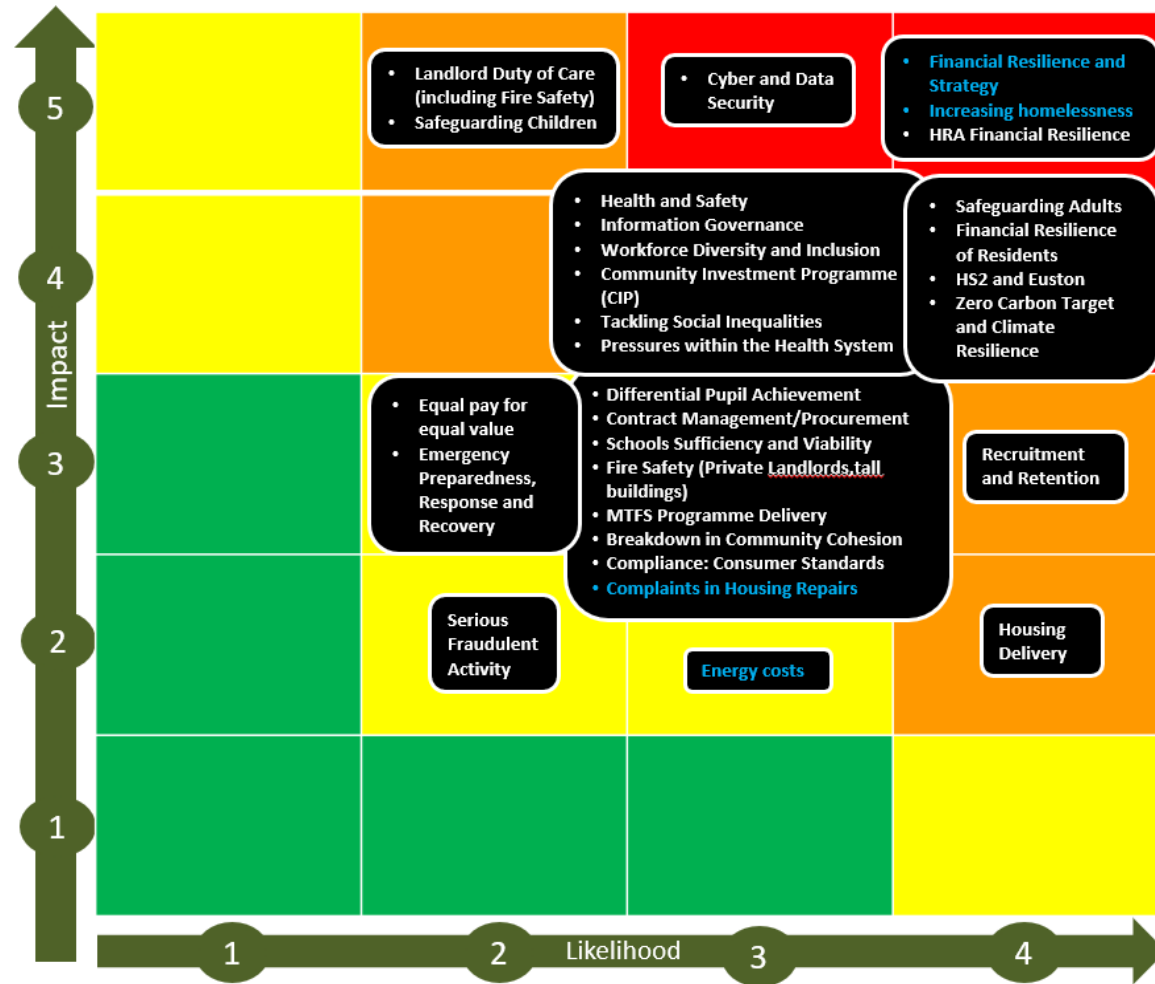
10.1. There are no known environmental implications arising from this report.

## 11. Appendices

- **Appendix 1:** Risk Impact Matrix and Principal Risk Heat Map
- **Appendix 2:** Risk Universe
- **Appendix 3:** How areas of risk link to 'We Make Camden' themes
- **Appendix 4:** Executive Summary of the Principal Risks
- **Appendix 5:** 'Risk On A Page' - detailed information and action plans for each Principal Risk

**Appendix 1: Risk Impact Matrix and Principal Risk Heat Map – October 2024** (the current risk scoring reflects the risk level in view of our current controls. Risks listed in blue indicate a change from the last report).

Impact Ratings	Financial	Service Delivery	Health and Wellbeing	Reputation
5	Financial loss above £10m.	Major disruption to a number of critical services.	Multiple deaths or serious/life-changing non-recoverable injury(s)/extreme safeguarding alerts likely.	Long term damage – e.g. Adverse national or local publicity, highly damaging severe loss of public confidence. Widespread and high level of criticism. Impacts on staffing and recruitment.
4	Financial loss above £8m.	Major disruption of a critical service.	Multiple casualties with recoverable injuries. Major safeguarding concerns potentially affecting multiple people. Evidence of known sustained neglect or abuse without intervention.	Medium to long term damage – e.g. Adverse local, regional or national publicity, major loss of confidence, a matter that is frequently referenced in relation to the council.
3	Financial loss above £6m.	Major disruption of an important service. Moderate disruption of a critical service.	Noticeable safeguarding risks – evidence of known neglect or abuse without intervention.	Medium term damage – e.g. Adverse publicity, local, regional and national coverage, with significant follow-up stories
2	Financial loss above £4m.	Moderate disruption of an important service.	Single casualties with recoverable injuries. Noticeable safeguarding risks – evidence of neglect.	Short term damage – e.g. Adverse publicity, national follow-up stories on the same issue.
1	Financial loss above £2m.	Brief disruption of an important service. Repeated disruption of a core service.	Medical treatment required, semi-permanent harm, up to 1 year. Safeguarding concerns of neglect.	Short term damage – e.g. Adverse publicity, regional follow-up stories on the same issue.
Likelihood Ratings	1 – Rare 1%	2 – Unlikely 10%	3 – Possible 20%	4 – Likely 50%



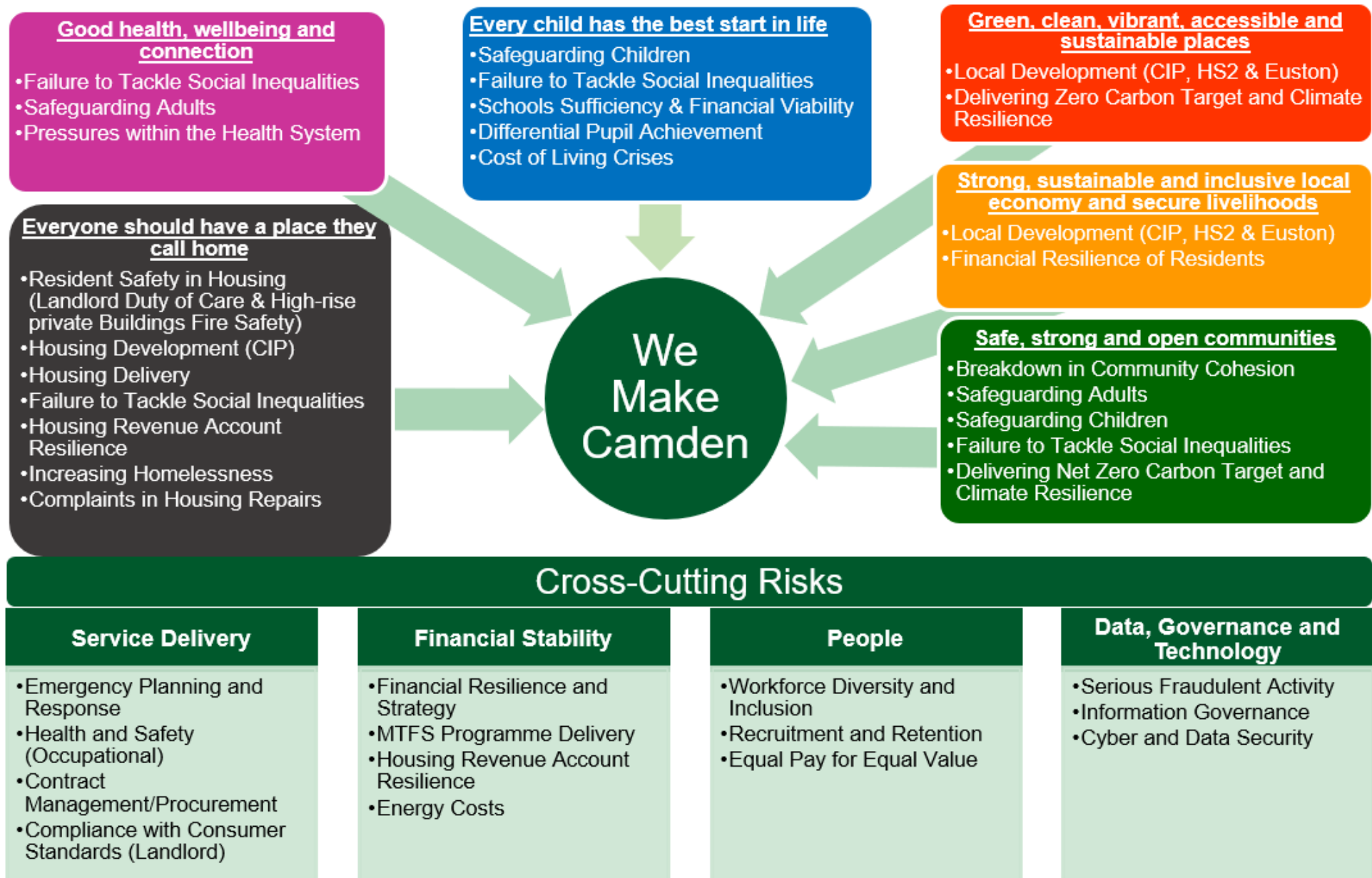
Note: Risks shown in the same black box have the same risk score, the order they are listed in within the box does not define a higher or lower score than the risk shown above or below within the same box.



**Appendix 2: Risk Universe (including latest risk trend) – CMT risk sponsors are listed in brackets**
















**Appendix 3: How areas of risk link to 'We Make Camden' themes**

















## Appendix 4: Executive Summary of Principal Risks (Details for each risk are set out in Appendix 5)







L=Likelihood Score, I=Impact Score. Risks are shown in order of descending risk score, scores are based on current levels of risk and controls in place









Change in score since Nov 2023	Current Score	Target Score	Risk Title	CMT Risk Sponsor	Forward Trend Oct 2023	Forward Trend Oct 2024	Comment on risk trend
+4	L:4 I:5 Score 20	L:3 I:1 Score 4	<b>1. Financial Resilience and Strategy -</b> Significant decline in the Council's financial sustainability and resilience (general funds)	<b>J. Rowney</b>			Early 2024/25 forecasts show a projected general fund overspend of £17m. Officers are currently working to address the overspends and reduce them in year. It is estimated that a further £10m of savings will be required to close the budget gap in 2025/26 and proposals for achieving this is being developed. The forward outlook remains increasing.
-	L:4 I:5 Score 20	L:2 I:1 Score 3	<b>2. Housing Revenue Account (HRA) Financial Resilience</b>	<b>J. Rowney/ G. Marston</b>			Several factors have contributed over the last few years to increase risk to the HRA financial resilience, most recently high-cost inflation for revenue and capital expenditure. The Council has added another £3.9m of savings to be delivered in 2024/25 to the existing HRA savings target of £7.51m of savings over the period 23/24 to 25/26. This risk presents with a continued increased forward outlook for the next 12 months.
<b>New</b>	L:4 I:5 Score 20	L:2 I:2 Score 4	<b>3. Increasing Homelessness</b>	<b>G. Marston</b>	-		Pressures on the Council's homelessness service has increased significantly over the last few years. Q1 2024 saw a 51% increase in statutory homelessness presentations compared Q1 2023. Council spend on temporary accommodation increased by 200% between 2021-22 and 2023-24, and significant overspend is forecast for 2024/25 unless robust action is taken. This risk is presenting as increasing over the next 12 months.

Change in score since Nov 2023	Current Score	Target Score	Risk Title	CMT Risk Sponsor	Forward Trend Oct 2023	Forward Trend Oct 2024	Comment on risk trend
-	L:4 I:4 Score <b>16</b>	L:3 I:3 Score 9	<b>4. Financial Resilience of Residents</b>	<b>J. Rowney</b>			The Council continue to deliver a programme of activities to support residents who are struggling financially. The Household Support Fund was extended by government in September 2024 for a further six months, to end of March 2025. While the national economy has stabilised, the higher level of costs remains. The risk presents as stable at present for the next 12 months.
-	L:4 I:4 Score <b>16</b>	L:3 I:2 Score 6	<b>5. Delivering Zero Carbon Target and Improving Climate Resilience</b>	<b>G. Marston</b>			Despite the publication of Camden's first Climate Adaptation and Resilience Plan in Nov 2023, services across the organisation are not yet fully prepared for climate hazards such as extreme summer heat and flooding. An extreme heat workshop was held with services in July 2024 to raise awareness of risks and explore vulnerabilities and possible action. The forward trend remains increasing.
-	L:4 I:4 Score <b>16</b>	L:3 I:3 Score 9	<b>6. High Speed 2 and Euston</b>	<b>G. Marston</b>			High levels of uncertainty remain around the new proposed development corporation and the new Government has not yet set out their position on HS2 at Euston (as of Sept. 2024). The forward outlook risk trend continues to present as increasing as public confidence has worsened as a result of the uncertainty.
-	L:4 I:4 Score <b>16</b>	L:2 I:4 Score 8	<b>7. Safeguarding Adults</b>	<b>J. McGregor</b>			The pressure on the service remains high and the council has added additional resources and staffing to reduce waiting lists however sustaining this reduction continues to be challenging. The risk exposure for the next twelve months is expected to remain high due to the financial, demand and workforce context in which we operate in.





Change in score since Nov 2023	Current Score	Target Score	Risk Title	CMT Risk Sponsor	Forward Trend Oct 2023	Forward Trend Oct 2024	Comment on risk trend
-	L:3 I:5 Score <b>15</b>	L:3 I:3 Score 9	<b>8. Cyber and Data Security</b>	<b>J. Rowney</b>			Cyber threats remain high risk with actors using increasingly sophisticated methods to attack organisations. The council continues to invest in its data security infrastructure to meet these challenges, including working with Camden schools to assess cyber risks. The forward trend remains increasing.
-	L: 3 I: 4 Score <b>12</b>	L: 2 I: 2 Score 4	<b>9. Pressures within the Health System</b>	<b>J. McGregor / K. Watters</b>			The council continues to work with health partners to deliver high quality outcomes for Camden residents and ensure that our approach to resourcing and investment is aligned and effective. Risk levels remain unchanged due to the significant healthcare demand and financial challenges and the risk is expected to remain at this level over the next 12 months.
-	L:3 I:4 Score <b>12</b>	L:3 I:3 Score 9	<b>10. Failure to Challenge and Address Social Inequalities</b>	<b>J. Rowney</b>			The Council is taking a cross-organisational approach to addressing inequalities with strong governance structures to drive progress. The Council will refresh its equality policy objectives in 2025 which will inform the development of a council-wide Equalities Strategy. The risk presents as stable for the next 12 months.
-	L:3 I:4 Score <b>12</b>	L:2 I:3 Score 6	<b>11. Health and Safety Incident (Occupational)</b>	<b>J. Rowney</b>			The team continue to monitor health and safety incidents and encouraging timely reporting of all incidents. The Council appointed a new provider for incident reporting at the end of 2023, accompanied by a communications plan to staff to address underreporting. The forward outlook remains stable for the next 12 months.






Change in score since Nov 2023	Current Score	Target Score	Risk Title	CMT Risk Sponsor	Forward Trend Oct 2023	Forward Trend Oct 2024	Comment on risk trend
-	L:3 I:4 Score <b>12</b>	L:3 I:3 Score 9	<b>12. Community Investment Programme (CIP)</b>	<b>G. Marston</b>			CIP has secured significant additional grant from the Greater London Authority and central government to mitigate increases in construction costs. Inflation levels have stabilised and there is healthy pricing competition in the tendering market. Sales performance remains stable. CIP has diversified delivery models, with the recent appointments of Mt Anvil to deliver Bacton II and Ballymore / Lateral on Camley Street. There is a read across to the HRA in that a major risk to the HRA's finances is unsustainable borrowing costs. This risk is mitigated by the CIP's diversification of its delivery models and by bringing in other sources of funding. The forward outlook continue to present as stable.
-	L:3 I:4 Score <b>12</b>	L:2 I:4 Score 8	<b>13. Information Governance – major data protection breach</b>	<b>J. Rowney</b>			There have been no major breaches reported to the Information Commissioner's Office (ICO) since the last report. The team is progressing recommendations from the Data Governance Review conducted in 2023 aimed at strengthening information governance and processes. The forward outlook remains stable.
-	L:3 I:4 Score <b>12</b>	L:2 I:2 Score 4	<b>14. Workforce Diversity and Inclusion</b>	<b>J. Rowney</b>			Diversity and inclusion pulse survey in 2023 showing positive progress and more data will be generated through the next staff survey in November 2024. The council continue to deliver a programme of work on diversity and inclusion and the forward outlook remains stable for the next 12 months.









Change in score since Nov 2023	Current Score	Target Score	Risk Title	CMT Risk Sponsor	Forward Trend Oct 2023	Forward Trend Oct 2024	Comment on risk trend
-	L:4 I:3 Score <b>12</b>	L:2 I:2 Score 4	<b>15. Recruitment and Retention</b>	<b>J. Rowney</b>			Recruitment activity remains very high due to a combination of replacement posts and new posts in some growth areas. There remain challenges in hard to recruit posts for specific service areas for examples social workers. Overall turnover levels are gradually reducing, and the forward trend has stabilised since the last report.
-	L:2 I:5 Score <b>10</b>	L:2 I:5 Score 10	<b>16. Landlord Duty of Care – breach of statutory duties as a landlord</b>	<b>G. Marston</b>			The Council was issued with a Regulatory Notice in July 2023 in relation to fire risk assessment actions and the installation of smoke and CO detectors and is progressing an action plan to address the regulator's findings. All high-risk actions have been completed. The Council is progressing the compliance programme related to the Fire Safety Act 2021 and the Building Safety Act 2022, and the forward trend has stabilised since the last report.
-	L:2 I:5 Score <b>10</b>	L:2 I:5 Score 10	<b>17. Safeguarding Children</b>	<b>T. Aldridge</b>			There continue to be an increased pressure on children's social care services. A restructure of the service in late 2023 has created additional capacity in response to need. Recruitment and retention is an ongoing challenge in the sector and the forward trend continues to present as increasing.

Change in score since Nov 2023	Current Score	Target Score	Risk Title	CMT Risk Sponsor	Forward Trend Oct 2023	Forward Trend Oct 2024	Comment on risk trend
-	L:3 I:3 Score <b>9</b>	L:3 I:3 Score 9	<b>18. Breakdown in Community Cohesion</b>	<b>G. Marston</b>			The ongoing conflict in the Middle East and the recent far-right violence and protests across the UK have impacted community tensions. Camden Community Cohesion Tension Monitoring Group continues to play an important role in supporting the cross-council approach towards promoting cohesion and community resilience. This risk continues to present with an increasing forward trend.
-	L:3 I:3 Score <b>9</b>	L:3 I:2 Score 6	<b>19. Medium Term Financial Strategy Delivery</b> - Failure to successfully identify and implement savings projects	<b>J. Rowney</b>			The Council is delivering a £28m savings programme will add additional savings over the next two years. Progress and levels of savings needed will depend on external financial pressures such as inflation and on future decisions on government funding. This risk presents as stable over the next 12 months.
-	L:3 I:3 Score <b>9</b>	L:3 I:3 Score 9	<b>20. Schools' Sufficiency and Financial Viability</b>	<b>T. Aldridge</b>			The Council continues to monitor and respond to changes in demand and has supported the temporary capping of reception places of three further schools. School roll forecasts are gradually stabilising, and the risk remains stable over the next 12 months.
-	L:3 I:3 Score <b>9</b>	L:3 I:3 Score 9	<b>21. Differential Pupil Achievement</b>	<b>T. Aldridge</b>			Nationally the attainment gap between disadvantaged groups and the wider pupil cohort is widening. Camden Learning is delivering a three-year school improvement programme which includes addressing the attainment gap in Camden schools. The risk level is expected to remain stable over the next 12 months.



Change in score since Nov 2023	Current Score	Target Score	Risk Title	CMT Risk Sponsor	Forward Trend Oct 2023	Forward Trend Oct 2024	Comment on risk trend
-	L:3 I:3 Score <b>9</b>	L:3 I:3 Score <b>9</b>	<b>22. Fire Safety</b> (high rise private building owners)	<b>G. Marston</b>			High risk mid-rise properties are being inspected as part of the Council's duties under the Housing Act 2004. Looking forward, the council might be expected to look at a larger number of medium rise properties and the team is monitoring government policy in this area. The forward outlook is assessed as stable for the next 12 months.
-	L: 3 I: 3 Score <b>9</b>	L: 1 I: 3 Score <b>9</b>	<b>23. Compliance with Consumer Standards (as a landlord)</b>	<b>G. Marston</b>			Camden's first Tenant Satisfaction Measures report was submitted to the regulator in June 2024, covering the period 1 April 2023 to 31 March 2024. The Regulator of Social Housing (RSH) will be carrying out analysis of the data submitted and will publish its findings in the Autumn 2024. It is likely that the Council's first inspection by the regulator will take place in 2025/26, potentially early in the financial year. RSH have indicated they expect many council landlords to receive non-compliant ratings due to complexity of the standards, context and service pressures and all London boroughs so far inspected have been non-compliant. We anticipate the Council will need time to demonstrate full compliance, and the risk trend is assessed as increasing over the next 12 months.

Change in score since Nov 2023	Current Score	Target Score	Risk Title	CMT Risk Sponsor	Forward Trend Oct 2023	Forward Trend Oct 2024	Comment on risk trend
<b>New</b>	L: 3 I: 3 Score <b>9</b>	L: 2 I: 1 Score 2	<b>24. Complaints in housing repairs-</b> Escalation of cases and referrals to Housing Ombudsman	<b>G. Marston J. Rowney</b>	-		There has been an increase in the number of complaints, primarily driven by a significant increase in repair complaints. In 2022/23, there was a 100% increase in Stage 1 complaints (total 2,431 complaints) and the increase has continued during 2023/24. The Housing Ombudsman's Complaint Handling Code became mandatory for all Social Housing Landlords from 1st April 2024. The Central Complaints team is working closely with services to ensure ongoing improvements in complaints handling. The risk presents as stable over the next 12 months.
-	L:3 I:3 Score <b>9</b>	L:2 I:3 Score 6	<b>25. Contract Management and Procurement -</b> Non-compliance with new requirements introduced by the Procurement Act 2023	<b>G. Marston</b>			The new regulations on procurement, which incorporates increased elements of contract management, will take effect from February 2025. The council is engaging with services to implement action to ensure compliance and provide training for contract managers in preparation for the new regulations. The forward trend is assessed as stable.
-	L4 I:2 Score <b>8</b>	L:3 I:2 Score 6	<b>26. Housing Delivery -</b> the Council does not meet overall housing targets as set out in the London Plan	<b>G. Marston</b>			Housing delivery in Camden in 2023/24 showed an improvement from recent years but delivery over the past four years has been less than half of the borough's challenging housing target. GLA is reviewing borough capacity for future housing development which will inform housing targets in the next London Plan. The Council will be engaging in this process and the forward trend is presenting as stable.

Change in score since Nov 2023	Current Score	Target Score	Risk Title	CMT Risk Sponsor	Forward Trend Oct 2023	Forward Trend Oct 2024	Comment on risk trend
-	L:2 I:3 Score <b>6</b>	L:2 I:3 Score 6	<b>27. Emergency Preparedness, Response and Recovery</b>	<b>G. Marston</b>			The ongoing Emergency and Contingency Planning Review has identified actions to further strengthen the council's approach to emergency planning. The review has also focused included emergency response and recovery procedures with an increased focus on working in partnership with local communities, particularly during an emergency response. The risk presents as stable over the next 12 months.
<b>-3</b>	L:3 I:2 Score <b>6</b>	L:3 I:2 Score 6	<b>28. Energy Costs</b>	<b>G. Marston</b>			Global energy markets have stabilised significantly and the prices for the 12-month supply period beginning in October 2024 are forecast reductions in both gas and electricity costs. The risk score has therefore been reduced and the trend over the next 12 months is assessed as stable.
-	L:2 I:3 Score <b>6</b>	L:2 I:2 Score 4	<b>29. Equal Pay for Equal Value</b>	<b>J. Rowney</b>			Work continues in moving the residual staff across to new contracts (c40 staff). The government have stated they will reinstate the School Support Staff Negotiating Body, to establish national terms and conditions. The details are expected in Q3 2024 and the Council will review the impact at that stage. The forward outlook for this risk remains stable for the next 12 months.
-	L:2 I:2 Score <b>4</b>	L:2 I:2 Score 4	<b>30. Serious Fraudulent Activity</b>	<b>J. Rowney</b>			The Council continues anti-fraud activity pursuant to the anti-fraud strategy. The forward outlook remains stable for the next 12 months.

## Appendix 5: 'Risk on a page' plans - Principal Risk detailed information and action plans

Risk Title –1. Financial resilience and strategy (general fund)	Risk Score	Existing Controls			
<p><b>Risk:</b> Significant decline in the Council's financial sustainability and resilience. The Council is operating in a challenging financial environment with significant cost pressures. Across Local Authorities there have been a growing number of financial issues that have resulted in individual local authorities either issuing s114 notices or publicly stating they may have to in the near future. <b>It should be noted that the Council is still financially resilient and does not currently foresee any significant change to this over the medium term.</b></p> <p><b>Cause:</b> Significant inflationary pressures across salaries and contract costs as well as spikes in utility costs directly to the Council and to partners and suppliers. There are significant cost pressures across social care from both inflation and demographic cost drivers. There are also significant pressures in Homelessness services. Government funding is not currently keeping pace with the financial pressures the council is facing resulting in the Council having to consistently agree and deliver budget savings over the past fourteen years in order to produce a balanced budget. In addition, the Government have issued a series of one-year financial settlements making it difficult to plan for them medium term and the Council has little certainty regarding funding beyond this year.</p> <p><b>Consequence:</b> The Council may not have sufficient resources to fund all of its priorities. Further savings will need to be made to meet the budget gaps</p> <p><b>Risk Update:</b> In January 2023, the Council agreed a new Medium Term Financial Strategy to deliver the level of savings to help meet the budget gap over the medium term. It is estimated that a further £10m of savings will be required to close the budget gap in 2025/26 and officers are currently working on proposals. In February 2024, the Council agreed a balanced budget for 2024/25, including an assessment of the Council's reserve levels are adequate over the medium term. The February 2024 report to Cabinet and full Council also included a summary of the Council's financial resilience and the risks and challenges facing the Council's continued financial resilience. Early 2024/25 forecasts show a projected general fund overspend of £17m in 2024/25. Officers are currently working to address the overspends and reduce them in year. The government have committed to returning to multi-year settlements in this parliament which may give more certainty to the Council's Medium Term financial forecasts. The progress of MTFS projects is reported to the relevant Directorate Teams and to the Camden Management Team (CMT) quarterly. The second quarterly update will be included in the report to Cabinet Members in December 2024 and will include a review of progress on the MTFS to date and an updated on the Council's overall medium- term position. Despite the agreed MTFS there remains a high level of uncertainty and challenge to our financial resilience.</p>	<p><b>Current Score:</b> L:4 I:5 (+1)</p> <p><b>Target Score:</b> L:3 I:1</p> <p><b>Gap to target:</b> L:1 I:4</p>	<ol style="list-style-type: none"> <li>Close monitoring of income streams and debt levels to see what impact inflationary pressures and the cost of living crisis is having on the Council's income and expenditure.</li> <li>CMT are taking a series of Oversight Panels to better understand and address areas of high financial risk across the Council. The first of these was held in July 2024 with more planned across the year.</li> <li>Reporting of the delivery of the MTFS exists as part of regular finance budget monitoring.</li> <li>Monitoring reports to Service, Division and Corporate levels (Senior Management Team, DMT and CMT), with the position being reported to Cabinet twice a year.</li> <li>Reviewing all Reserves to identify reserves that the Council is not currently contractually committed to spend in order to identify available reserves in case of further unexpected financial pressures.</li> <li>Lobby central government on the financial pressures caused by exceptional inflationary pressures and the cost-of-living crisis and well as the complex funding issues relating to Social care to be taken into account in future funding settlements. This is individually and via partner organisations such as London Councils.</li> <li>The Council has enacted a 5% (reduced to 2.5% for 21/22 onwards) vacancy rate to reduce expenditure and to increase financial resilience.</li> <li>The Council has set a balanced budget for 2024/25. Early forecasts are for an overspend of £17m in the GF, however officers are working to reduce this in year and the Council has set aside a reserve to support any final overspends.</li> <li>The Council's MTFS includes a further contribution of £1.5m per year to the General reserve balance to support the risk management and financial stability of the Council. with the use of set aside reserves to meet unexpected budgetary pressures.</li> </ol>			
<p><b>Action</b></p>	<p><b>Expected impact</b></p>	<p><b>Resources required</b></p>	<p><b>Owner</b></p>	<p><b>Due Date</b></p>	<p><b>Status</b></p>

<ul style="list-style-type: none"> <li>- Continue to monitor budgets and report to DMT/CMT to ensure timely action is taken to address financial pressures.</li> <li>- Identify and agree systemic changes to income and expenditure budgets due to policy decisions and to inflationary and demographic pressures and include these in the Council's MTFS</li> <li>- Develop and review financial metrics to help inform an assessment of the Council's financial resilience.</li> </ul>	Reduce L	Staff	J Rowney	Ongoing	In progress
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Risk Title – 2. Housing Revenue Account (HRA) Financial Resilience	Risk Score	Existing Controls
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<p><b>Risk</b> – Significant decline in the Council's resources to fund the management, maintenance and delivery of new housing stock.</p> <p><b>Cause</b> –The events of the past few years have created a very challenging context for the HRA. The period from 2016-2020 saw enforced annual rent reductions of 1% resulting in the loss of c.£105m in rental income. The evacuation of the Chalcots Estate in the summer of 2017 and subsequent fire safety works, removal of cladding and remedial works resulted in an extremely large budget pressure. Government grant and a payment in settlement of a legal claim have by no means fully covered the cost. More recently the Council has been affected by high cost inflation for revenue and capital expenditure including energy costs, increased interest rates and new costs associated with fire &amp; building safety, damp and mould, disrepair claims and increased regulation. At the same time, the cost-of-living crisis and the roll-out of Universal Credit have impacted rent collection levels.</p> <p><b>Consequence</b> – The Council may not have sufficient resources to fund all of its priorities and any future unforeseen expenses. Further savings will need to be made to meet the budget gaps. The HRA's reserves would gradually be run down. The failure to properly manage and maintain the stock also risks the health and wellbeing of our tenants and leaseholders and the reputation of the Council as a quality landlord particularly in light of the new social housing regulatory regime.</p> <p><b>Risk Update:</b> In January 2024, the Cabinet agreed to add another £3.9m of savings to be delivered in 2024/25 to the existing HRA Medium Term Financial Strategy (MTFS) savings target of £7.51m of savings over the period 23/24 to 25/26. Housing Directors monitor the delivery of the HRA MTFS through monthly meetings. There is also a plan to gradually build up HRA reserves to ensure financial resilience and continue to manage HRA borrowing and debt profiles to reduce impact on capital financing. Energy prices have fallen so present less of a risk to budgets although arrears on rent and service and energy charges remain high. Major risks at Q1 24/25 were overspends on repairs driven principally by disrepair cases and on interest payments driven by increases in interest rates. There is a continued increasing risk trend. Despite the current and planned actions to mitigate risk, there are external risks to the HRA's financial resilience over which the Council has limited control, such energy prices, external interest rates, cost inflation and the government's rent policy. Overall, there are growing concerns about whether the Council can meet all of its maintenance obligations within existing resources. The new social housing regulatory regime could mean that the Council would be unable to access capital grants if it scored poorly in an inspection.</p>	<p><b>Current Score</b> L:4 I:5</p> <p><b>Target Score:</b> L:2 I:1</p> <p><b>Gap to target:</b> L:2 I:4</p>	<ol style="list-style-type: none"> <li>1. Reporting of the current financial strategy exists as part of regular monitoring, with the ability to increase the savings required through the existing savings programme to help the HRA live within revenue budgets.</li> <li>2. Monitoring reports to Service, Division and Corporate levels (Senior Management Team, DMT and CMT), with the position being reported to Cabinet twice a year.</li> <li>3. Regular monitoring by Executive Director Corporate Services of the council's immediate and long-term income streams and debt levels.</li> <li>4. Monitoring of the HRA borrowing headroom and prioritisation of capital commitments to see if any activities can be moderated to free up resources.</li> <li>5. Review of expiring contracts and seeking efficiencies wherever possible.</li> <li>6. Looking at non-essential services to assess what costs could be saved in the event it is necessary for the Council to reduce costs in-year</li> <li>7. Shift how the CIP is financed to reduce the need for borrowing, as set out in a recent report to Cabinet</li> <li>8. A Housing transformation programme is being implemented to improve the quality of services to tenants and leaseholders and to deal with issues early to prevent repairs and housing management costs escalating.</li> <li>9. The Council has set up an internal board to closely monitor its compliance with the new social housing regulatory regime.</li> </ol>
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Action	Expected impact	Resources required	Owner	Due Date	Status
Continue to monitor budgets and report to DMT/CMT to ensure timely action is taken to address financial pressures.	Reduce Likelihood	Staff	J Rowney	Ongoing	In progress

Implement the savings programme	Reduce likelihood	Staff	G Marston	Ongoing	In progress
Develop an asset management strategy to bridge the gap between available capital resources and required capital investment	Reduce likelihood	Staff, housing assets	G Marston	Dec 2024	In progress

Risk Title – 3. Increasing Homelessness	Risk Scores	Existing Controls			
<p><b>Risk:</b> Increasing number of people presenting as homeless put financial pressure on the Council due to expensive use of temporary accommodation.</p> <p><b>Cause:</b> Sustained increase of people applying as homeless or sleeping rough due to the current economic climate, cost of living, central government asylum policy, and lack of suitable affordable homes.</p> <p><b>Consequence:</b> Considerable pressure on general funds budget, hardship for Camden residents facing homelessness.</p> <p><b>Risk Update:</b> Pressures on the Council's homelessness service has increased significantly over the last few years. This increase is caused by various factors including a reduction in affordable housing; delay in move-on from emergency accommodation leading to fewer vacancies; and an increase in refugees leaving Home Office accommodation homeless and in a destitute situation. Between April and June 2024, 387 people were seen rough sleeping in Camden. This represents a 38% increase compared to the same period last year. Q1 2024 also saw a 51% increase in statutory homelessness presentations compared with the same quarter last year with 721 applications in Q1 2023/24 compared to 1086 in Q1 2024/25. Camden is responding to this rise by ensuring that all people who rough sleep in the borough are provided with a service offer by Routes off the Street team. The council has been awarded over £4million via the Single Homelessness Accommodation Programme to increase short and long-term accommodation for people who have slept rough. All London authorities are seeing large increases in spend on temporary accommodation. Camden's total spend on TA increased by 200% between 2021-22 and 2023-24 and is mostly made up by spend on B&amp;B and commercial hotels. Camden has a duty to secure temporary and emergency accommodation for certain homeless households in priority need under Part 7 of the Housing Act 1996. At the end of Sept 2024, the Council was providing temporary accommodation to around 900 households. Numbers in temporary accommodation has increased by 42% since the end of year 2022/23. Temporary accommodation continues to be a financial challenge for the Council, with significant overspend forecasted for 2024/25 unless robust action is taken. The council is working towards finding new, more financially stable options to meet this statutory duty. A range of short and longer terms actions and initiatives are being implemented to reduce immediate pressures as well as find sustainable solutions going forward.</p>	<p><b>Current Score:</b> L: 4 I: 5</p> <p><b>Target Score:</b> L: 2 I: 2</p> <p><b>Gap to target:</b> L:2 I: 3</p>	<ol style="list-style-type: none"> <li>1. Routes Off the Street Service - Camden has enhanced its street outreach team to meet the needs of people who are rough sleeping by hiring a nurse and psychologist into the team.</li> <li>2. Building closer relationships with private landlords and increasing incentives to give us access to more PRS properties in which to support residents to sustain tenancies.</li> <li>3. Identifying blockages preventing people moving out of hotels and B&amp;Bs and into more suitable, long-term accommodation options</li> <li>4. Identify suitable void properties on regeneration sites for use as TA (e.g., West Kentish Town estate)</li> <li>5. Converting a small number of general needs voids into TA to help us meet some of the demand for self-contained units</li> <li>6. To increase our in-house provision of self-contained TA units, Chester and Camden Road hostels are due to open in late 2025, providing an extra 86 family units</li> <li>7. Following on from the success in securing 133 properties through Temporary Accommodation Purchase Programme (TAPP) 1 and 2, we have also secured funding from MHCLG for a third phase, TAPP3, which will deliver an extra 57 units of TA by the end of 2025.</li> </ol>			
Action	Expected impact	Resource	Owner	Due Date	Status
Deliver the housing restructure to align services to better procure and manage temporary accommodation and increase our frontline prevention resources.	Reduce L&I	Staff	G Marston	Jan 2025	In progress
A review of our sheltered housing service and stock may identify potential opportunities to consider a change of use to temporary accommodation where the building is deemed unsuitable for older persons living or underoccupied	Reduce L&I	Staff	G Marston	March 2025	In progress
Undertake Peer to Peer review of our Private Rented Procurement service with a view to increase our placements into the private rented sector.	Reduce L&I	Staff	G Marston	Dec 2024	In progress
Recruit additional resource to procure self-contained temporary accommodation.	Reduce L&I	Staff	G Marston	1 Nov 2024	In progress

Re-negotiate nightly rates with current accommodation providers.	Reduce L&I	Staff	G Marston	1 Nov 2024	In progress
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Risk Title – 4. Financial Resilience of Residents		Risk Scores	Existing Controls			
<p><b>Risk:</b> Rise in the cost of living reinforces economic inequalities and significantly reduced economic wellbeing for residents.</p> <p><b>Cause:</b> Sustained increased cost of living, in-work poverty and economic inactivity</p> <p><b>Consequence:</b> Significant increase in poverty and inequality across Camden, increasing demand for Council services.</p> <p><b>Risk Update:</b> Camden continues to deliver a series of response programmes to support individuals and households including the Cost-of-Living Fund (CoL) and the Household Support Fund (HSF). On 2<sup>nd</sup> September 2024, HSF was extended by government for a further six months, to end of March 2025. Together with Discretionary Housing Payments (DHP) these funds mean that the Council has £6.9m to fund direct cash grants to residents and the administration of these grant programmes.</p> <p>Since the launch of the CoL fund in September 2022, the fund has had 18,000 applications from residents and paid out over £5.3m in grants to Camden households. These funds are administrated by Money Advice Camden, who combine the grant making with debt and benefits advice capacity.</p> <p>These funds sit alongside Camden’s Council Tax Support Scheme, in which the Council invests over £29m a year.</p> <p>It is important to note that whilst headline inflation figures have gone down, costs have not; and many at risk households rely on benefits or wages which have not kept pace with inflation. Therefore, whilst this risk has stabilised it is still very present.</p>		<p><b>Current Score:</b> L:4 I:4</p> <p><b>Target Score:</b> L:3 I:3</p> <p><b>Gap to target:</b> L:1 I:1</p>	<ol style="list-style-type: none"> <li>1. A set of strategic documents provide a framework for inclusive growth that benefits our communities and set out our expectations of how partners support communities</li> <li>2. Camden’s Council Tax Support Scheme is one of the most generous in London, and we continue to support low-income households with 100% deductions to ensure they have as much money available to them each month.</li> <li>3. Income maximisation, budgeting, debt and welfare advice is available in the community, both through the 12 voluntary sector organisations that make up the Camden Advice Network and through dedicated Camden staff in Adult Social Care, Early Help, Landlord Services, Good Work Camden and Money Advice Camden.</li> <li>4. Good Work Camden Programme, with Job Hubs in Gospel Oak, Regents Park and Kilburn each with a team of employment and welfare advisers and brokers. Within this universal service, bespoke approaches are delivered to support specific cohorts – disabled people, refugees, young people, people affected by homelessness.</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status	
Deliver response programme to support residents, including the household support fund and the cost-of-living crisis fund	Reduce likelihood and impact	Resources	J. Rowney	Ongoing	In progress	

Risk title – 5. Delivering zero carbon and improving Camden’s climate resilience	Risk Scores	Existing Controls			
<p><b>Risk:</b> The Council does not reduce carbon emissions to zero in response to the climate emergency and fails to adapt or build resilience to future climate hazards such as increased summer temperatures and intense rainfall.</p> <p><b>Cause:</b> Lack of national policy and funding for decarbonisation and climate resilience. Lack of Council resource and/or funding to deliver net zero and to build Camden’s adaptive capacity to climate risks. Complexity of the challenge - over 65% of borough emissions stem from the commercial sector and key infrastructure vulnerable to extreme weather events is owned and managed by 3<sup>rd</sup> parties such as Thames Water and TfL</p> <p><b>Consequence:</b> Reputational risk of failing to meet zero carbon. Risk to life and infrastructure associated with poor resilience and adaptation to climate hazards such as flood and heat risk. Plus risks to health, well-being and productivity from heat and flood risk; risks of water deficits in public supply; disadvantaged communities disproportionately affected by climate impacts.</p> <p><b>Risk Update:</b> Despite the publication of Camden’s first Climate Adaptation and Resilience Plan in Nov 2023, services across the organisation are not fully prepared for climate hazards such as extreme summer heat and flooding, with Business continuity/service plans generally in need of improvement in this area. An extreme heat workshop was held with services in July 2024, with the findings endorsed by the Corporate Resilience and Assurance Group, however greater service level engagement is needed to progress actions. Flood risk remains a key issue given Thames Water’s financial position however sustainable drainage projects are being delivered by the Council across Camden with new projects underway to improve flood related infrastructure in and around the key flood risk areas of South End Green and South Hampstead. Flood risk remains a multi-agency risk with the capacity of Thames Water’s sewer network remaining critical.</p>	<p><b>Current Score:</b> L:4 I:4</p> <p><b>Target Score:</b> L:3 I:2</p> <p><b>Gap to target:</b> L:0 I:2</p>	<ol style="list-style-type: none"> <li>The Climate Action Plan is reviewed every six months and is governed through a programme risk register. Annual reviews of the Climate Action Plan are published.</li> <li>The Climate Adaptation and Resilience Plan is reviewed annually as part of the Climate Action Plan review</li> <li>The council’s Flood Risk Management Strategy runs to 2027 and is reviewed annually</li> <li>The Citizen panel established in 2020 in response to the Citizens’ Assembly on the Climate crisis oversees progress of the Council’s Climate Action Plan 2020-2025.</li> <li>We measure carbon emissions across Camden and our own estate on an annual basis. Borough emissions data is provided by Government on an annual basis on an 18-month delay.</li> <li>C&amp;E Scrutiny reviews the Climate programme annually</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status
Deliver the adopted Climate Action Plan – improved public information, sustainable transport infrastructure, and the delivery of low carbon energy projects are all priorities over the next 12 months.	Reduce Likelihood	Financial/Staff/IT/Policy	G Marston	Ongoing	In progress
Design a retrofit strategy to improve and finance energy efficiency improvements across our Housing estate	Reduce impact	Financial/Staff/External support	G Marston	Ongoing	In progress
Flood Risk Management Strategy	Reduce impact of flood risk	Financial/Staff/External funding and partner	G Marston	Ongoing	In progress
Deliver the Climate Adaptation and Resilience Plan	Build adaptive capacity to extreme weather	Financial/Staff/External funding and partner delivery	G Marston	Ongoing	In progress
Emergency management/BECC warnings focusing on extreme weather events such as intense rainfall and heatwaves	Help to prepare communities and services for extreme weather	Staff time	G Marston	Ongoing	In progress

Risk Title – 6. High Speed 2 and Euston	Risk Scores	Existing Controls
<p><b>Risk:</b> The HS2 and Euston project does not deliver the desired community benefits/mitigations and place improvements to the time, cost and quality needed. New approach being pushed by Government heightens the risk to delivering community benefits. There is a risk of over development and lack of planning control introduced by a development zone at Euston in order to pay for the station and infrastructure at Euston. There is also a risk that HS2 will not come to Euston if enough private finance cannot be raised and public funds are not secured.</p> <p><b>Cause:</b> New government approach to delivery Euston station, relying on private finance and the creation of some form of development zone. This is in response to spiralling costs of design and construction and Council's limited ability to influence.</p> <p><b>Consequence:</b> Reduced community benefit/place improvements. Depending on the outcome of the development zone work, Governments new expectation of the use of private financing for the station and the approach to housing delivery (there is a statement from DfT that advocates for the delivery of 10,000 homes at Euston) there could be reduced economic benefits, notably knowledge and tech potential, loss of faith in the Council as the body representing the communities' interests.</p> <p><b>Risk Update:</b> The previous Government cancelled the HS2 Manchester Leg and announced a new development zone/corporation and a 6-platform station in October 2023. The new Labour Government have not set out a formal position on their approach to HS2 at Euston as yet. The team commissioned consultants Metro Dynamics to produce an Economic Impact Assessment (EIA) and strategic narrative to highlight the economic potential at Euston which was published in March 2024. Whilst construction works are paused, officers have been working with the community to identify opportunities for 'meanwhile use' with a new green space on Hampstead Road delivered, a co-designed green space adjacent due to be delivered by October 2024, a new space at Maria Fidelis annex run by Old Diorama Arts Centre and potential to use part of the construction site for construction plant training in association with the Construction Skills Centre at Euston. Camden held a further community conversation in September 2024 on community priorities for housing delivery in the Euston area, as the Council continues to work with the Ministry of Housing, Communities and Local Government (MHCLG) to look at housing delivery potential. The conversations will also cover how the uncertainty facing HS2 is affecting our residents and businesses and any concerns about HS2 works restarting in April 2025. Options for a 6 platform HS2 station are being looked at and Camden is pressing to be involved in the evolution and assessment of these. We published a direction of travel document to set out our likely response to these changes in the Euston Area Plan (EAP) over the summer and are now considering the next published update to the EAP to allow for time to consider any outputs from MHCLG and community conversation housing discussions in light of the new Government's national housing ambition. We will also continue to work to ensure that the Council is able to input Camden priorities into the decision-making process through established boards and lobbying where necessary. The forward outlook risk trend is increasing as public confidence has worsened as a result of the uncertainty.</p>	<p><b>Current Score:</b> L:4 I:4</p> <p><b>Target Score:</b> L:3 I:3</p> <p><b>Gap to target:</b> L:1 I:1</p>	<ol style="list-style-type: none"> <li>1. Cllr Beales and Camden's Chief Executive attend Euston Partnership Board.</li> <li>2. We are progressing the EAP review alongside the Local Plan review, timing to reflect outcomes of housing delivery work in the area.</li> <li>3. The Council continues to lobby senior stakeholders at Euston and pressing for leadership role, alongside local community and key partners and the retention of planning powers by the Council in any new development zone/corporation.</li> <li>4. Camden continues to publish press statements and arrange regional and national news items highlighting the impact on our communities.</li> <li>5. Camden is working with MHCLG in partnership to ensure local needs and voices are included in the work to identify potential new housing delivery locations in the Euston area.</li> <li>6. Camden is also holding a community conversation and developing an engagement plan to allow residents to get involved in considering options for new housing and change in the Euston area</li> <li>7. A spreadsheet of all of the assurances is reviewed regularly in conjunction with HS2 and the community where the community is able to comment on progress.</li> </ol>

Action	Expected impact	Resources required	Owner	Due Date	Status
Progress independent examination of the Euston Area Plan	Reduce impact	Staff	G Marston	Ongoing	In progress
Continued lobbying for Camden to have a leadership rule/ be the oversight authority in any new Development Corporation/ Delivery structure	Reduce impact	Staff	G Marston	Ongoing	In progress
Continue to work with MHCLG to look at potential to deliver new homes in the Euston area, utilising the £4m set aside to look at options	Reduce impact	Staff	G Marston	Ongoing	In progress

Risk Title – 7. Safeguarding Adults	Risk Score	Existing Controls				
<p><b>Risk:</b> Ineffective identification, recording &amp; response to preventable cause of harm to adults at risk of abuse or neglect (physical, mental or financial).</p> <p><b>Cause:</b> (1) External Provision - ineffective monitoring of providers or poor quality of care. (2) Internal Provision – under-developed approaches to QA leading to poor quality of care and practice. (3) ineffective identification of safeguarding risks to individuals and ineffective care &amp; support put in place to mitigate those risks</p> <p><b>Consequence:</b> Death / injury/harm to an individual or individuals arising from abuse and/or ineffective responses to safeguarding concerns, adverse publicity, complaints from residents and ombudsman.</p> <p><b>Risk Update:</b> There is ongoing pressure in the system with a high number of people waiting for assessments services and reviews. Adult Social Care (ASC) services have continued to experience increased demand and some residents are presenting with more complex need including people at risk of, or experiencing homelessness. We have added additional resources and staffing, and this is helping reduce waiting lists however sustaining this reduction continues to be challenging. The service has completed a review of how ASC teams are structured and how well initial interactions with residents are working. This has helped ensure that the right capacity is in place and that resources are being used to maximum efficiency in response to the demand in communities. Management teams continue to prioritise safeguarding work and triage and RAG rate waiting lists to ensure that those with the most urgent need are waiting for the least time. The Safeguarding Adults Partnership Board continues to oversee the themes and learning from Safeguarding Adults Reviews. These statutory reviews are conducted in situations where people with care and support needs have died or come to significant harm and where there were concerns about how well agencies worked together to protect that person. Recent Reviews have identified themes about how well agencies are working together to safeguard people experiencing homelessness and the learning from these reviews are driving improvements in this area. The ASC Workforce Strategy will help mitigate recruitment and retention challenges across our own and commissioned services. This will focus initially on recruitment to the hardest to fill roles. In June 2024 the CQC announced their intention to carry out an inspection of ASC in Camden. This new inspection regime seeks assurance from Councils about how well they exercise their statutory duties under the Care Act 2014, with one safeguarding theme focussing on how we support residents who are at risk of harm or abuse. A self-assessment and set of evidence have been submitted ahead of the onsite visit in Nov 2024 and we expect the outcome of the inspection in early 2025. The risk exposure for the next twelve months is expected to remain high. Whilst we are working hard to mitigate safeguarding risks, the current financial, demand and workforce context in which we operate continues to be very challenging.</p>	<p><b>Current Score:</b> L:4 I:4</p> <p><b>Target Score:</b> L:2 I:4</p> <p><b>Gap to target:</b> L:2 I:0</p>	<ol style="list-style-type: none"> <li>1. Camden continues to invest in Adult Social Care to improve the quality of services and to ensure that prevention and early intervention is prioritised</li> <li>2. Oversight of the 5-year strategic plan is provided by the Supporting People Connecting Communities Board; ensuring that the strategic plan is being delivered and monitors all transformation projects and savings projects</li> <li>3. Where people are waiting for care &amp; support interventions we are regularly reviewing and reporting on waiting lists and taking a risk-based approach to prioritisation</li> <li>4. We continue to work closely with health partners, in particular reviewing the safety of discharges from hospital settings</li> <li>5. Staff resilience is monitored through staff supervision, our process is now more focussed on staff wellbeing with more frequent and informal contact.</li> <li>6. The safeguarding inbox continues to be monitored daily to ensure that we are picking up trends or areas of concern with our providers, weekly safeguarding reports pick up trends, which are shared between operational and commissioning teams</li> <li>7. Mandatory e-learning on Safeguarding Awareness</li> <li>8. The Safeguarding Adults Board continues provide strategic direction and accountability for ensuring that statutory and non-statutory partners area aware of and fulfil their safeguarding duties and responsibilities</li> <li>9. We are signed up to the Ethical Care Charter and are a London Living Wage employer</li> <li>10. Contracts with external providers are awarded on a long-term basis, with a focus on building strategic partnerships to improve quality</li> <li>11. Regular monitoring visits of care providers, and enhanced monitoring is put in place if there are quality concerns. Our suite of quality assurance documentation, including provider failure procedures, has recently been updated.</li> <li>12. Monthly departmental Provider Oversight Board meetings and quarterly meetings with CQC to review the quality of providers and help to pro-actively identify issues</li> <li>13. We have in place long term care and reablement providers which are geographically aligned with GP practices and our neighbourhood teams.</li> <li>14. Quality Assurance Framework in place which is monitored by a monthly Quality Board and a Quality Action Group. There are twice-yearly external case file audits and monthly internal audits of safeguarding practice.</li> <li>15. Deepened work on coproduction so that resident voice is embedded in everything that we do for a deeper understanding of how well we are safeguarding residents.</li> </ol>				
<b>Action</b>	<b>Expected impact</b>	<table border="1"> <thead> <tr> <th data-bbox="1285 1369 1496 1469">Resources required</th> <th data-bbox="1496 1369 1688 1469">Owner</th> <th data-bbox="1688 1369 1881 1469">Due Date</th> <th data-bbox="1881 1369 2190 1469">Status</th> </tr> </thead> </table>	Resources required	Owner	Due Date	Status
Resources required	Owner	Due Date	Status			

Deliver Adult Social Care Workforce Strategy	Reduce Likelihood	Staff	J. Mcgregor	Ongoing	In progress
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Risk Title – 8. Cyber and Data Security	Risk Scores	Existing Controls			
<p><b>Risk:</b> Process control networks, devices and/or critical information assets/data may be compromised</p> <p><b>Cause:</b> Computer-based unauthorised access, denial of service, and malicious modification of code or unknown damage/access. End of life/aging Information Technology (IT) kit and infrastructure</p> <p><b>Consequence:</b> Potential loss of access to all systems and data, limiting our ability to deliver services and business as usual. Potential compromise to our access to data either temporarily or permanently (including historical case data). Damage, restricted access, denial of access, denial of service or information breach.</p> <p><b>Risk Update:</b> The overall cyber threat landscape remains complex and ever-changing, with increasingly sophisticated tools and attack methods employed against organisations. The Digital and Data Services (DDS) division has continued to deliver critical work as part of the Council's Cyber Security Programme, with the focus expanding to consider specific threats of foreign interference in our democracy highlighted by the UK Government Defending Democracy Taskforce (DDTF). Recent areas of focus have included Public Service Network (PSN) and Payment Card Industry Data Security Standard (PCI-DSS) 4.0 recertification, and a continued focus on security remediation with targeted activity based on severity, leveraging our vulnerability management platform. We have continued to deliver awareness training to members. We have completed a risk assessment of cyber security in Camden secondary schools and are working on primary schools. DDS staff participated in an externally facilitated desktop exercise to test the Council's approach to a range of service-impacting incidents in July 2024. Furthermore, DDS is working with the Corporate Resilience and Assurance Group (CRAG) to review all service Business Continuity Plans (BCP) across the Council.</p> <p>DDS continues to focus on leveraging investments in modern technology; our skilled cyber team and continuing focus on processes and procedures as part of our Information Security Management System (ISMS) are improving overall organisational maturity in information governance.</p>	<p><b>Current Score:</b> L:3 I:5</p> <p><b>Target Score:</b> L:3 I:3</p> <p><b>Gap to target:</b> L:0 I:2</p>	<ol style="list-style-type: none"> <li>1. Data, digital and technology policy and controls in place, such as device encryption, email security, role-based access controls, web access firewall (WAF), Endpoint Detection &amp; Response (EDR).</li> <li>2. Corporate Induction training regarding computer usage policy and information security policies.</li> <li>3. 3rd party penetration testing to test and improve our data, digital, and technology security.</li> <li>4. Compliance and statutory standards projects</li> <li>5. Cross-council coordination to remove users from systems when they leave.</li> <li>6. Robust standards for authentication and integrated security monitoring.</li> <li>7. Business Continuity and Disaster Recovery Plans</li> <li>8. Monthly system updates and reporting.</li> <li>9. Digital Services continue to be involved in the procurement process to improve cyber security. Digital Services sit on Council's procurement local board and complete due diligence on all technology suppliers.</li> <li>10. Internal Communications and ongoing awareness training programmes for all staff.</li> <li>11. Contract in place with cyber incident response support partner.</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status
Deliver ongoing staff cyber training and awareness-raising.	Reduce Likelihood	Staff time across the Council	J Rowney	Ongoing	In progress
Deliver the digital plumbing and applications rationalisation programmes.	Reduce Likelihood	Staff and investment	J Rowney	Ongoing	In Progress
Deliver ongoing Information Security Programme based on ISO 20071, ensuring continuing risk-based approach to cyber security remediation.	Reduce Likelihood	Staff and investment	J Rowney	Ongoing	In Progress

Risk Title – 9. Accumulation of Pressures within the Health System	Risk Scores	Existing Controls			
<p><b>Risk:</b> Continuation of system pressures within health services arising from the threat of industrial action, increasing demand, elective care backlog and seasonal care demand which results in the local health system being unable to meet residents needs and greater pressure on adult social care.</p> <p><b>Cause:</b> No single individual cause but an accumulation of risks within the system including the continued threat of industrial action, increasing demand due to poorer resident health, elective care backlog and seasonal pressures.</p> <p><b>Consequence:</b> Increasing pressure on council services population, ill health and poorer health and wellbeing outcomes</p> <p><b>Risk Update:</b> The Council continue to engage fully in the North Central London Integrated Care System (NCL ICS) and in the Camden Integrated Care Partnership (ICP) to support a resilient health and care system. We are working closely with the North Central London Integrated Care Board (ICB) to review our pooled budgets, our Better Care Fund and processes for integrated strategic planning. This will help ensure that we are able to continue to deliver high quality outcomes for Camden residents and ensure that our approach to resourcing and investment is aligned and effective. We are also working closely with partners from primary care, community health and mental health to implement our first integrated health and care neighbourhood team. We continue to commission a number of preventive health and wellbeing services within primary care to support health and wellbeing. Risk levels remain high due to the significant healthcare demand and financial challenges and the level of change needed to achieve full integration between health and social care.</p>	<p><b>Current Score:</b> L: 3 I: 4</p> <p><b>Target Score:</b> L: 2 I: 2</p> <p><b>Gap to target:</b> L: 1 I: 2</p>	<ol style="list-style-type: none"> <li>1. Active engagement of the council in the development of integrated care systems and delivery of the population health and integrated care strategy ambitions.</li> <li>2. Meetings between key Camden health and care leaders</li> <li>3. The development of joint Council and Integrated Care Board (ICB) initiatives to integrate community services thereby getting the best value from the available resources in the community.</li> <li>4. Effective communication, joint working and governance across the ICB and the Local Authority, including the Health and Wellbeing Board, regular meetings of senior Cabinet member and officers, the integrated commissioning committee and developing governance arrangements to support the Camden local strategy.</li> <li>5. Shared ownership of the 'Better Care Fund' and prioritisation of resources to where they are most needed. Camden's Executive Director for Corporate Services is playing a key role with the ICB to review financial arrangements.</li> <li>6. Camden Integrated Care Executive – Chaired by Executive Director for Health and Adults, senior executive oversight of the developments of integrated care partnership borough level), accountable to Health and Wellbeing Board.</li> <li>7. We have an established Health Protection Group which has supported residential and care settings with good practice infection prevention and control.</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status
Continued work the delivery of the ambitions within the Population Health and Integrated Care Strategy	Reduce overall score	Staff	J. Mcgregor / K. Watters	Ongoing	In progress

Risk Title – 10. Failure to Tackle Social Inequalities	Risk Scores	Existing Controls			
<p><b>Risk:</b> Failure to challenge and address social inequalities in Camden  <b>Cause:</b> Poor prioritisation, lack of clear governance, and/or detailed project/programme management  <b>Consequence:</b> Loss of community confidence in the Council. Poor outcomes for residents.  <b>Risk Update:</b>            There has been a recent number of issues raised relating to accessibility and disability equality and the Council are undertaking a review on our accessibility requirements to address this.            Camden has assigned care experience as a protected characteristic and there will be training for teams rolled out on implementing this in practice via the Equality Impact Assessment process.            The council is running a project funded by the Council of Europe (intercultural cities programme) on developing guidelines and best practice for community cohesion engagement which will inform future activities in this area.</p> <p>Mitigations for this risk include embedding a cross-organisational approach to addressing inequalities with strong governance structures to drive progress. The overall governance model for the equalities piece has been reviewed and the new governance structures will ensure that the ambitions are focused, that work is streamlined, and allows for an agile approach to the Equalities agenda. The council will revise its Equality policy objectives in 2025 which will inform the development of a council-wide Equalities strategy.</p> <p>Race and disability equality legislation is under review by the new government and there may be changes coming on requirements in those areas.</p>	<p><b>Current Score:</b> L:3 I:4 <b>Target Score:</b> L:3 I:3 <b>Gap to target:</b> L:0 I:1</p>	<ol style="list-style-type: none"> <li>1. We are establishing new governance controls whilst working closely with our Cabinet Member for Equalities and Cohesion.</li> <li>2. Director of Equalities and Community Strength provides strategic leadership to the Council's efforts to tackle inequalities.</li> <li>3. Equality Impact Assessments – we are undertaking a review of all EQIAs done in the last 6 months</li> <li>4. Disability Oversight Panel – facilitation of the public facing sessions have moved to the Equalities service. The service is also trialling innovative ideas in the disability space, working in co-design with our disabled communities.</li> <li>5. Expanded remit for the Equalities Team</li> <li>6. The Equality Act 2010 requires councils (and other public sector organisations) to set at least one equality objective every four years.</li> <li>7. Diversity mission – will be used as a control with clear base line measures and data driving the change.</li> <li>8. Diversity in the public realm strategy created with implementation plan being programme managed by the Equalities service with deliverables throughout the council.</li> <li>9. The Camden Equity Network was launched in 2022 to share best practice across the Borough around equalities with our partner institutions.</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status
Building community confidence in close partnership with community organisations and partners	Reduce Impact and Likelihood	Communications/ Resources	J Rowney	Ongoing	In Progress
Development of a Council-wide Equality Strategy – in line with Equalities objectives and policy	Reduce Impact and Likelihood	Communications/ Participation	J Rowney	TBC	In Progress
Review and update the Council's Equalities policy	Reduce Impact and Likelihood	Communications	J Rowney	Sept 2025	Planned



Risk Title – 11. Health and Safety (Occupational)	Risk Scores	Existing Controls			
<p><b>Risk:</b> Significant health and safety incident  <b>Cause:</b> Governance and/or policies are inadequate, Staff non-compliance with policies  <b>Consequence:</b> Incident resulting in life changing or fatal results and/or regulatory action  <b>Risk Update:</b>  The team continue to monitor data from health and safety incidents and near misses and encouraging timely reporting of all incidents. The Council appointed a new provider for incident reporting at the end of 2023, accompanied by a communications plan to staff on how to report and incident to address underreporting. Data suggests an increase in work-place related violence against staff in public facing roles by members of the public (verbal and physical) and staff is actively encouraged to report all incidents.  The new Substance Misuse Policy was launched in January 2024 and 2 rounds of drug and alcohol testing of staff in safety critical roles within the Camden Accessible Transport Service (CATS) has been carried out so far.  A centralised caution register within the Customer Relationship Management (CRM) system has been developed. Camden has been working through several risks and challenges around launching the Caution Register as a council-wide product, to be used by all services. A pilot of the product will be launched within the Contact Camden service by the end of the year to test the processes and generate learning before full roll-out in 2025.  Staff wellbeing and mental health remains a focus. The Council is in the process of changing providers for our Employee Assistance Programme and will work with the new supplier to encourage staff take up of this service.</p>	<p><b>Current Score:</b>  L:3  I:4  <b>Target Score:</b>  L:2  I:3  <b>Gap to target:</b>  L:1  I:1</p>	<ol style="list-style-type: none"> <li>1. Corporate and Directorate level health and safety policies in place.</li> <li>2. Quarterly safety performance reports to CMT Safety Management Board and DMT's.</li> <li>3. Health and safety modules part of mandatory training</li> <li>4. Health and safety management courses and risk assessment training in place</li> <li>5. Manager's guide and workshops which incorporate key health, safety, and wellbeing messages.</li> <li>6. Health and safety audits of services – ongoing programme</li> <li>7. Personal safety awareness module.</li> <li>8. Wellbeing strategy in place with targeted wellbeing interventions based on data.</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status
Implement phase 2 of drug and alcohol testing for staff in safety critical roles within Property Management and Facilities Management.	Reduce Likelihood	Financial/HR/Policy	J Rowney	Nov 2024	In progress
Support the pilot launch of the caution register within CRM system	Reduce Likelihood	IT	J Rowney	Dec 2024	In progress

Risk Title – 12. Community Investment Programme (CIP)		Risk Scores	Existing Controls			
<p><b>Risk</b> The Council does not deliver on its high-quality regeneration targets within programme timescales or approved budget parameters.</p> <p><b>Cause</b> Delayed/reduced capital receipts, funding restrictions, contractor poor performance exacerbated by economic uncertainty.</p> <p><b>Consequence</b> Failure to maximise opportunities to deliver new and improved affordable housing, and community facilities and/or achieve target outcomes.</p> <p><b>Risk Update:</b> CIP schemes not yet in contract have been subject to thorough financial scrutiny. CIP is part of <i>Benchmarking Construction for London</i>, an external benchmarking group with other London Boroughs which allows officers to ensure that project costs are robust and in line with the market. CIP schemes have an Employers Agent who certifies that contracts awarded represent value for money. In the last year, CIP has secured significant additional grant from the Greater London Authority (GLA) and the Ministry of Housing, Communities and Local Government (MHCLG) to mitigate increases in construction costs. The GLA has recently announced additional flexibilities in their affordable homes programme, which will enable CIP projects to bid for grant for intermediate homes, increasing the amount of grant projects can secure.</p> <p>CIP has secured significant additional grant from the GLA and Government to provide refugee housing. These grants, coupled with a corporate contribution have helped de-risk the CIP Programme by reducing the sales risk in three CIP projects. Inflation levels have stabilised and there is healthy pricing competition in the tendering market. Sales of new built homes by CIP are performing well. There are only homes for sale in a project that completed in June 2024 with all other schemes being sold out. The market outlook is that of cautious optimism, there remains subdued residential newbuild activity but viability challenges are showing some signs of easing. CIP teams continue to challenge contract costs and negotiating and seeking value engineering solutions to reduce risks.</p>		<p><b>Current Score:</b> L:3 I:4</p> <p><b>Target Score:</b> L:3 I:3</p> <p><b>Gap to target:</b> L:0 I:1</p>	<ol style="list-style-type: none"> <li>The programme is managed so that schemes are at different stages of delivery at any one time thereby minimising exposure to risks in the external market.</li> <li>The programme operates a sound governance process with key decisions made by Executive Directors in consultation with relevant cabinet members and directors. For large projects, additional deep-dives are being undertaken to scrutinise the finances, this has helped to secure some discounting in recent contract awards.</li> <li>CIP's robust governance process assesses project viability at key stages of development and the capital programme is monitored to ensure the Council is not overexposed to sales risks. Sales are performing well and the sales team reviews strategies on all schemes.</li> <li>Progress on CIP schemes is monitored on a monthly basis with key risks and issues identified and addressed through governance boards.</li> <li>CIP is subject to a yearly internal audit as well as a yearly GLA audit. Lessons are learnt continuously and implemented to ongoing projects.</li> <li>The programme's financial position is monitored and reviewed on a quarterly basis. Contractors are selected through a robust and compliant procurement processes and work within standard industry forms of contract.</li> <li>A new development model has been implemented by the CIP team to provide better reporting and ensuring consistency between projects. A quarterly update is provided to Executive Directors and includes the performance of each scheme against agreed KPI's and an overall view of the CIP programme.</li> <li>The Council is part of the 'Benchmarking Construction for London' group which allows members to benchmark tender returns anonymously to ensure they are in line with the market.</li> <li>A regular Commercial focussed session is held, with external expertise in development finance brought in to provide strategic commercial advice and a regular construction and property market update to provide challenge and rigour to our projects.</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status	
Secure additional affordable housing grant and seek other support from government partners. Bidding on a project by project basis to optimise grant allocation based on viability.	Could improve viability and reduce capital funding requirement of projects.	Resource in place	G Marston	March 2025	Ongoing	



Risk Title – 13. Information Governance	Risk Scores	Existing Controls			
<p><b>Risk</b> - Major breach of Data Protection legislation  <b>Cause</b> - Staff are not appropriately trained in information handling and data protection. Non-compliance with Information in Camden and IT policies. Council does not keep personal/special category/criminal offence data secure.  <b>Consequence</b> – Negative impact on individuals whose data have been inappropriately handled or breached. Action by regulator. Reputational damage.  <b>Risk Update:</b>  Data breaches - There have been no major breaches reported to the Information Commissioner’s Office (ICO) since the last report. The team continue joint work with Digital and Data Service to implement recommendations from the Data Governance Review conducted in 2023. Actions will be completed in 2025 and include the maintenance of the Information Asset Register (IAR) and classification of Data Assets.  In response to these findings work has commenced on refreshing the IAR and working with DDS to develop a Data Governance tool which will include a comprehensive data catalogue.  A review of the approach to data governance practices resulted in the creation of a Data Governance Board, an Information Security Management Systems working group and an Information management working group. These groups will work together to strengthen governance overview and will support the strategic oversight of the overarching Corporate Information Governance Group (CIGG).  Information asset owners (IAOs) have been identified and communications have gone out to IAOs explaining their responsibilities and asking them to review the Information Assets. Providing training for them is an area of focus for the next year.</p>	<p><b>Current Score:</b> L:3 I:4 <b>Target Score:</b> L:2 I:4 <b>Gap to target:</b> L:1 I:0</p>	<ol style="list-style-type: none"> <li>1. GDPR/Information Handling training module in place. Compulsory training on Information Handling/Data protection awareness has been reviewed in preparation for the launch of the biennial mandatory training round for all staff in Dec 2024-Feb 2025. Bespoke data protection training provided by the Data Protection Advice Team to Housing Teams, Social Work Teams</li> <li>2. Information Asset Register in place and review plan in place to ensure it contains all necessary information.</li> <li>3. There is Role Based Access Control (RBAC) to all Council systems and additionally staff accessing Mosaic have Disclosure and Barring Service (DBS) check and must sign an Acceptable User Policy.</li> <li>4. Data breach notification procedure in place.</li> <li>5. Additional email controls implemented for Children Service staff, which identifies key sensitive words and auto prompts the sender to check who the email is being sent to (to be rolled out to other key services in late 2024).</li> <li>6. Data Protection Impact Assessment (DPIA) Procedure in place, Templates reviewed in July 2024 and on Essentials. All pre-screens and full DPIAs are proactively published</li> <li>7. Regular communications to ensure staff are up to date with General Data Protection Regulation. – Ongoing, via Essentials and Yammer. Additional communications on data protection and reminder communications sent out regularly including videos</li> <li>8. Retention Schedule complete. Programme of retention/destruction of paper records started in January 2020 and is ongoing.</li> <li>9. Emails containing sensitive data are sent securely via Egress, Azure Information Protect (AIP) &amp; Office 365 Encryption.</li> <li>10. Strategic Corporate Information Governance in place, with operational subgroups</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status
Provide awareness raising and training to IAOs to know their responsibilities.	Reduce Likelihood	Staff	J Rowney	May 2025	In progress
Implementation of the Data Governance tool to manage and replace the Information Asset Register.	Reduce Likelihood	Staff	J Rowney	Ongoing	In progress

Risk Title – 14. Workforce Diversity and Inclusion	Risk Scores	Existing Controls			
<p><b>Risk</b> - Failure to become a more inclusive and diverse organisation in an inclusive and diverse community.</p> <p><b>Cause</b> - Failure to attract a diverse workforce, failure to provide equality of opportunity to support progression, failure to promote and support inclusion.</p> <p><b>Consequence</b> - Lost opportunities to better be able to meet the needs residents need through diversity of thought and experience. Staff experiencing discrimination and not being able to bring their best self to work.</p> <p><b>Risk Update:</b> Diversity and inclusion pulse survey in 2023 showing positive progress. Over 90% of respondents think Camden is making progress to becoming an anti-racist organisation. Over 80% feel they belong and feel they are treated fairly and with respect. Diversity and inclusion continue to be a key priority for the Council and our staff with global events continuing to contribute to the experience and focus in the organisation. Significant work continues to take place in this area to address the issues on multiple fronts:</p> <ul style="list-style-type: none"> <li>Continuing our work to be a 'Bloody Good Employer' – including introducing access to menstrual products in the toilets of all our main buildings and more recently bladder-leak products</li> <li>We have refreshed our Menopause Commitment including more practical support.</li> <li>Our Chief Officer ethnicity profile is now representative of our local population</li> <li>We will be conducting our next Inclusion pulse Survey in Oct/Nov - 2024</li> </ul> <p>The reporting discrimination hub was launched in June 2024 with a commitment to review in 6 months. The hub is a safe and supportive space for colleagues to report any discrimination they may see, hear or experience at work. It is staffed by a diverse group of colleagues (known as our Hub members) with a variety of lived experiences, skills and expertise.</p>	<p><b>Current Score:</b> L:3 I:4</p> <p><b>Target Score:</b> L:2 I:2</p> <p><b>Gap to target:</b> L:1 I:2</p>	<ol style="list-style-type: none"> <li>Race Equality Action plan continues to be implemented.</li> <li>More inclusive recruitment practices including the format and language used in our job profiles and adverts to be more inclusive, an ongoing commitment to internal recruitment opportunities wherever possible to support internal progression opportunities. We have a stated commitment in all our recruitment advertising to flexible working arrangements. Our recruitment is anonymised and we have diverse interview panels including a pool of trained inclusive recruitment volunteers. For roles at Level 5 and above we have a commitment to We are also launching a pilot scheme of no all-white shortlists for as a positive action to improve diversity at our senior levels.</li> <li>Reporting Discrimination Hub in place from June 2024</li> <li>Support and signposting to our staff network and inclusion groups - Camden Disability Network, Rainbow Network, Menopause Group, Women's Network, Camden Black Workers Group, Carers Network, the Men and Women of Colour Progression Networks, Race Catalysts groups, Muslim Network, Jewish group, faith groups.</li> <li>An expanded Trauma Support offer to support staff who may be experiencing a range of issues and emotions related to trauma – from grief, loss and burnout, to the impact of racial and other types of trauma.</li> <li>The Wellbeing passport continues to be well received as is the introduction of Disability Leave.</li> <li>Carers' network continues to meet and we continue to run sessions with partners to support our staff who have caring responsibilities.</li> <li>LGBTQ+ - Stonewall Workplace Equality Index – Camden assessed as the top local authority in the country against the index and ranked the 47<sup>th</sup> organisation overall.</li> <li>Diversity data update – continued communication to get staff to update their diversity data</li> <li>Independent external legal assessment that the Council's pay policy is not discriminatory.</li> <li>Gender, ethnicity and disability pay gap analysis undertaken since 2015. Progress towards closing any gaps particularly with regard to ethnicity.</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status
Continue to progress the Race Equality Action Plan	Reduce Likelihood	Financial/Staff/IT/Policy	J Rowney	Ongoing	In progress
Run next Inclusion Pulse Survey	Reduce Likelihood	Staff	J Rowney	Oct 2024	In progress
Improve diversity data coverage	Reduce Likelihood	Staff	J Rowney	Ongoing	In progress
Review of Reporting Discrimination Hub	Reduce Likelihood	Staff	J Rowney	Jan 2025	Planned



Risk Title – 15. Recruitment and Retention	Risk Scores	Existing Controls				
<p><b>Risk:</b> Failure to recruit and retain the people we need to deliver our services.  <b>Cause:</b> The demand for high quality staff, particularly in specialist roles outweighs supply.  <b>Consequence:</b> Council services will be under resourced and service delivery will be sub-optimal.  <b>Risk Update:</b> Recruitment activity remains very high across Camden. This is a combination of replacement posts and new posts around some growth areas. Overall turnover levels are still coming down – in June 2023 it was at 11.1% and in June 2024 it was at 8.6%. Critical turnover is still being monitored particularly in some key areas. Key hard to recruit/retain posts as well as areas where we have high agency usage remain an issue - these include for example social workers, key housing and property posts, lawyers. We are pursuing different strategies to address issues in the different areas with some interventions being more bespoke to the service/profession. Initiatives being used include – targeted recruitment – including via Social media, review of benefits packages for key roles including considering market/retention supplements in some critical areas. We have reviewed our recruitment attraction approach and have had success with some very hard to recruit posts. We continue with our inclusive recruitment approaches and these re embedded across all stages of our recruitment process. Talent attraction is changing and moving away from traditional job boards with focus being on Social Media platforms such as LinkedIn, Twitter and TikTok. In order to remain competitive in the job market Camden is increasing engagement with Social Media where we can better showcase our employer brand, culture, and employee proposition. As well as recruiters, Hiring Managers need to engage on these platforms to ensure we reach the right people. We are continuing with the review of elements of the pay scheme. We have introduced changes at our most junior grades and at the more senior grades to ensure our pay is competitive in the market. This included benchmarking our pay against the market and looking at changes that could be made to ensure the pay scheme meets the changing needs of the Council recognising the challenging economic conditions whilst minimising the potential for inequity to occur. We continue to review our pay scheme to ensure pay progression supports our retention in key skills and experience.</p>	<p><b>Current Score:</b> L:4 I:3 <b>Target Score:</b> L:2 I:2 <b>Gap to target:</b> L:2 I:1</p>	<ol style="list-style-type: none"> <li>1. Internal recruitment first encouraged to support development opportunities for existing staff.</li> <li>2. Continuous development of recruitment and retention strategy and talent acquisition processes</li> <li>3. Continuing with our review of the pay system to enable flexibility with confidence that it will be used equitably.</li> <li>4. Immigration loan scheme for staff to support them in making applications for British Citizenship, Indefinite Leave to remain and payment of the Healthcare Surcharge for themselves and their immediate dependents.</li> <li>5. Suite of resources and support regarding cost-of-living pressures including access to free and impartial advice on money issues through Money Helper, and a tenancy deposit loan scheme,</li> <li>6. The ‘Future of Work’ programme aims to ensure that our accommodation, people support and tech are geared up to support staff to do their jobs effectively as the nature of work changes going forward</li> <li>7. Exit interviews are being encouraged through a questionnaire sent to all leavers. Data will be further analysed to understand any pockets of higher turnover in key areas – including critical turnover.</li> <li>8. Encourage more ‘stay interviews’ and performance and career development discussions and support</li> <li>9. Employee Value Proposition revamp to be initiated to ensure our brand is up to date</li> <li>10. Continue to seek opportunities for Apprenticeships across the organisation</li> <li>11. Camden Talent Pool targeting entry level roles to local people</li> <li>12. Targeted recruitment and retention support for critical groups such as social workers</li> <li>13. Career development workshops are available and feedback from staff that have attended is positive.</li> <li>14. Inclusive recruitment initiatives implemented with ongoing review to support diversity including</li> <li>15. Camden continues to get the most out of recruiting via Social Media both from the posting of our vacancies but also encouraging engagement from our Managers online to promote roles and the organisation.</li> </ol>				
Action	Expected impact	Resources required	Owner	Due Date	Status	
Talent acquisition review work to continue – including our EVP and social media attraction	Reduce likelihood	Financial/Staff	J Rowney	Ongoing	In progress	
Ongoing monitoring of recruitment and turnover	Reduce likelihood	Financial/Staff	J Rowney	Ongoing	In progress	

Progress with review of the pay scheme.	Reduce likelihood	Financial/Staff/ Independent advisors	J Rowney	April 2025	In progress
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Risk Title – 16. Landlord Duty of Care (including fire safety)	Risk Scores	Existing Controls			
<p><b>Risk</b> - Breach of statutory duties as a landlord (including tenant management organisations)</p> <p><b>Cause</b> - Non-adherence to or insufficient policies and procedures, insufficient resources</p> <p><b>Consequence</b> - Injury or fatality, impact on resident well-being, reputational damage, prosecution and / or fines</p> <p><b>Risk Update</b> – The Council is continuing the compliance programme related to the Fire Safety Act 2021 and the Building Safety Act 2022. Budgetary provisions have been made to deliver this work, including £4.5m per annum to implement the new safety regulations. The Council has allocated over £200m in its own resources since 2017 to fire and building safety capital works.</p> <p>The Council was issued with a Regulatory Notice in July 2023 in relation to fire risk assessment (FRA) actions and the installation of smoke and CO detectors. On FRA actions the Council had in 2023 9,000 overdue actions incorporated in its existing programmes. There are no outstanding high-risk actions since June 2024. The Council continues to focus on all overdue actions to get to a position of business as usual. The Council closed 10,376 actions in the rolling 12 months up to 23 September 2024, with 7,402 closed this calendar year. Weekly progress meetings are held to track performance across low and medium risk actions. Contractor and skilled resources remain a challenge, combined with 'no access' to properties.</p> <p>Other specific work includes:</p> <ul style="list-style-type: none"> <li>- Chalcots estate – re-cladding works in progress at all 5 towers. This will see an A1 fire rated façade installed, part funded by the ACM remediation fund.</li> <li>- Cromer St estate – re-cladding work has completed to three blocks above 18m</li> <li>- Birkenhead Estate – further funds have been secured from the Cladding Safety Scheme to remediate the external wall insulation to three blocks</li> <li>- Stock condition survey completed which will inform prioritisation of investment and programmes of works. It also informed the new asset management strategy and stock options appraisal which will go to Cabinet for approval in December 2024.</li> <li>- The Council completed a review related to RAAC in early 2024 and no risks have been identified to date within the Council's stock.</li> <li>- There is continued focus on improving performance on lift safety checks by the Council's insurer. An internal weekly working group is driving this work, with a focus on the highest risk buildings.</li> </ul> <p>The Council is reviewing the recommendations from the Grenfell Inquiry report and considering next steps.</p>	<p><b>Current Score:</b> L:2 I:5</p> <p><b>Target Score</b> L:2 I:5</p> <p><b>Gap to target</b> L:0 I:0</p>	<ol style="list-style-type: none"> <li>1. A well-established performance framework in place to demonstrate regulatory compliance performance for the housing stock including gas, electrical, lifts, asbestos, fire &amp; water hygiene.</li> <li>2. New Governance measures introduced following the Regulatory Notice include a new Council-wide governance board to cover all regulatory standards and a monthly report to members of Housing Scrutiny Committee and the Housing &amp; Fire Safety Advisory Panel (HFSAP). The HFSAP has been expanded to increase resident membership to a total of 12 places and seats for all political groups, cabinet, deputy leader and the appointment of a safety expert as co-Chair</li> <li>3. The resident safety team has led a review of policy and procedures across all areas of compliance. Training requirements have also been established with a fire &amp; building safety mandatory module introduced and training programme being developed for persons accountable under the Building Safety Act.</li> <li>4. Steps have been taken to accelerate the completion of internal fixed wire tests to complete the transition to a five-year testing cycle.</li> <li>5. The approach to fire risk assessments has been reviewed and a process in place for risk assessment and change control where a significant issue is identified within a building.</li> <li>6. A specific fire safety capital works team and programme manager are in place.</li> <li>7. Head of Resident &amp; Building Safety established and team in place. 10 building safety managers and a team leader appointed.</li> <li>8. External BS9997 Audit of Fire Safety Management Systems completed.</li> <li>9. Policy for the removal and disposal of combustible items in communal areas in place with regular inspections and removal of items ongoing as business as usual</li> <li>10. The Gas Safety Case inspections continue in line with regulatory requirements, reflecting the Council's status as a gas transporter.</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status
Deliver compliance programme against Building Safety Act and regulations pursuant to the Fire Safety Act, including: a) Submission of Building Safety Cases in priority order based on risk analysis; b) Reviewing new Gateway Regime requirements with Planning and Building Control	Reduce L & I	Financial/Staff/IT/ Policy	G Marston	Ongoing	In progress

Deliver the Regulatory Notice action plan and report on progress to the Regulator of Social Housing.	Reduce L & I	Financial/Staff/IT/Policy	G Marston	Ongoing	In progress
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Risk Title – 17. Safeguarding Children		Risk Scores	Existing Controls		
<p><b>Risk:</b> There is a risk we are unable to either prevent, identify and/or respond to children who may be at risk of significant harm</p> <p><b>Cause:</b> Reporting/monitoring error/oversight. Staff oversight/non-adherence to policy, increased need</p> <p><b>Consequence:</b> Safeguarding breach, significant harm to child(ren).</p> <p><b>Risk Update:</b> Camden’s children’s safeguarding and social work was rated as outstanding in the 2022 Ofsted inspection, which provides assurance of the quality of practice in the borough. Recruitment and retention continue to be a challenging area across the sector. We are undertaking a wider benchmarking exercise to inform our positioning on the recruitment market which is expected to complete by the end of 2024.</p> <p>We completed a significant restructure of CSSW in November 2023 with all appointments successfully completed. This has created additional capacity in the service for care experienced adults and resource to focus on delivering our sufficiency duty.</p> <p>Unaccompanied child asylum seekers continue to present regularly, and we have specialist resource to support these traumatised separated children. We are doing extensive work on sufficiency of placements for care experienced young people. The cost of placements has increased significantly over the last few years and suitable housing options are limited in the borough.</p>		<p><b>Current Score:</b> L:2 I:5</p> <p><b>Target Score:</b> L:2 I:5</p> <p><b>Gap to target:</b> L:0 I:0</p>	<ol style="list-style-type: none"> <li>1. Weekly, monthly and quarterly performance reports are produced and checked alongside dip sampling of exceptions and a regular programme of auditing and learning from complaints to ensure we are following policies to maintain the quality of practice and mitigate risk and need.</li> <li>2. The regular production of management information and oversight of Senior Managers at all levels provides challenge and helps to ensure quality and compliance across the service.</li> <li>3. Complaints from service users or significant partners (School or GP’s) are escalated to the Director of Children’s Prevention, Family Help and Safeguarding the DCS.</li> <li>4. Challenge of the controls and governance is undertaken by the Local Safeguarding Board.</li> <li>5. Ongoing monthly checks are undertaken by the service in which 75 areas of activity are reviewed, the information reviewed is volume and quality.</li> <li>6. Benchmarking exercises using data from the Department for Education</li> <li>7. Policies, Governance and training in place.</li> <li>8. Auditing of case files to check quality of practice and adherence to standards.</li> <li>9. Mandatory Safeguarding training in place</li> <li>10. Fostering Panels</li> <li>11. Cross council review-the work of the VAGW Board is working will internal and external stake holders</li> <li>12. Visiting and plans are in place for every child who has had an assessment.</li> <li>13. Contact for children in care supervised by staff.</li> <li>14. Liaison with partners for oversight and guidance</li> </ol>		
Action	Expected impact	Resources required	Owner	Due Date	Status
Continued focus on recruitment and retention, fully operational multi-agency front door	Reduce Likelihood	Financial and staff	T. Aldridge	Ongoing	In progress
Continued focus on sufficiency of care placements	Reduce likelihood	Staff	T. Aldridge	Ongoing	In progress

Risk Title – 18. Breakdown in Community Cohesion	Risk Scores	Existing Controls			
<p><b>Risk:</b> Breakdown in community cohesion leading to community unrest  <b>Cause:</b> Terrorist attack, critical incident, extreme ideology which may directly or indirectly lead to civil unrest and has an adverse impact on community cohesion.  <b>Consequence:</b> Community unrest (rioting, disruption, violence)  <b>Risk Update:</b> The challenges relating to further enhancing community cohesion remain varied and complex. The ongoing conflict in the Middle East and the recent far-right violence and protests across the UK have impacted community tensions. These issues have influenced an increase in hate crime and in particular a rise in antisemitic and Islamophobic hate crime in Camden – replicating trends seen across London.  Camden Inclusion events celebrate Camden’s rich and diverse cultural, religious, and social community, fostering a more inclusive environment. The events are designed to create opportunities for our community organisations and council partners to build stronger relationships and enhance levels of community unity. The wider programme of activity includes a focus on faith and cohesion. This is supported by work across the council to monitor community tensions and combat hate crime.  The Camden Community Cohesion Tension Monitoring Group continues to play an important role in supporting the cross-council approach towards promoting cohesion and community resilience. By working closely with services across the council, community organisations and partners such as the Met Police, the group ensures that there is a coordinated approach to supporting local communities, sharing local intelligence and responding to localised issues.  The Council is now funding Prevent related activity due to the cessation of ring-fenced central government grant funding which was previously used to tackle radicalisation and extremist ideologies. This approach aligns with Camden’s commitment to safeguarding and community engagement through its Prevent action plan.</p>	<p><b>Current Score:</b> L:3 I:3 <b>Target Score:</b> L:3 I:3 <b>Gap to target:</b> L:0 I:0</p>	<ol style="list-style-type: none"> <li>8. Reporting to the Community Safety Partnership Board and the Camden Safeguarding Adults Partnership Board regarding Prevent related activity.</li> <li>9. Analysis of borough-wide Hate Crime data to be included within the revised quarterly reports forwarded to the Camden Community Safety Partnership.</li> <li>10. Embedding the monthly Community Cohesion Tension Monitoring Group meetings and evaluate its impact regarding the mitigation of cohesion related risks.</li> <li>11. Maintaining contact through our network of faith leaders and voluntary sector organisations to understand the situation within our community.</li> <li>12. Further support for the Camden Faith leader’s forum which enables engagement with faith groups on key community issues, including tensions and hate crime.</li> <li>13. Quarterly Prevent Steering Group meetings in line with the relevant Home Office guidance - order to evaluate risks relating to radicalisation and extremist ideology.</li> <li>14. Continuing the bi-monthly Hate Crime dip-sampling sessions being delivered in partnership with the Metropolitan Police Borough Command Unit.</li> <li>15. Continuation of weekly partnership tasking meetings with the Police to assess local intelligence and agree intervention measures etc.</li> <li>16. Annual exercise through the Borough Resilience Forum on Council/partner response to a major incident (e.g. terrorist attack).</li> <li>17. Quarterly meetings of the Camden Resilience Advisory Group (internal) chaired by the Executive Director Supporting Communities and facilitated by the Emergency Management Service.</li> <li>18. Fortnightly meetings with the Met Police Borough Command Unit to review the development of the local Camden policing plan in line with the ‘New Met for London strategy’.</li> </ol>			
Action	Expected impact	Resources	Owner	Due Date	Status
Continue to work with the Police to influence the development of the Borough Policing plan	Reduce likelihood	Staff and Policy	G Marston	Ongoing	In progress
Maintain the delivery and evaluation of the Camden Prevent programme.	Reduce likelihood	Staff and Policy	G Marston	Ongoing	In progress
Continue to hold regular Community Cohesion Tension Monitoring Group meetings.	Reduce likelihood and impact	Staff	G Marston	Ongoing	In progress
Maintain the delivery and evaluation of the Hate Crime dip sampling process in partnership with the Met Police.	Reduce impact	Staff	G Marston	Ongoing	In progress



Risk Title – 19. Medium Term Financial Strategy (MTFS) Programme Delivery	Risk Scores		Existing Controls		
<p><b>Risk</b> - Failure to successfully identify and implement savings projects as part of the Council's MTFS</p> <p><b>Cause</b> - Capacity (in-service/corporate services particularly IT and Finance), governance, resource, lack of innovation lack of engagement from services. Pressure to deliver services means focus on the delivery of MTFS is challenging.</p> <p><b>Consequence</b> - Financial savings are not achieved/delayed impacting the cost and quality of council services and damaging the Council's financial resilience.</p> <p><b>Risk Update:</b>            In January 2023, the Council agreed a new Medium Term Financial Strategy to deliver the level of savings to help meet the budget gap over the medium term. It is estimated that a further £10m of savings will be required to close the budget gap in 2025/26 and officers are currently working on proposals.            The Council is closely monitoring its medium-term position in response to high inflationary pressures and may revise the level of savings required as part of its MTFS to ensure the Council remains financially resilient.            The Council identified and agreed £28m of savings to be delivered over the next three years and will add additional savings over the next two years.            The development of additional MTFS proposals will be programme managed by officers from Corporate Services with regular 'check points' at CMT to report on the progress on identifying new savings proposals. Progress and levels of savings required will depend on the level of external financial pressures such as inflation and on future decisions on government funding.            Proposals will be discussed with Cabinet Members to ensure only proposals that are in line with political priorities are included in the final list of proposals to Cabinet later this year.            The delivery of the current MTFS savings programme is being monitored as part of the Council's governance arrangements and is included as part of the budget forecasting process and reported to the appropriate divisional and directorate management teams as well as to the Camden Management Team (CMT) on a quarterly basis.</p>	<p><b>Current Score:</b> L:3 I:3</p> <p><b>Target Score:</b> L:3 I:2</p> <p><b>Gap to target:</b> L: 0 I: 1</p>	<ol style="list-style-type: none"> <li>1. CMT 'deep dives' on key (high risk) projects as part of the CMT Oversight panels.</li> <li>2. CMT updates on level of savings proposals being developed. including total value of proposals and risk scores for each proposal</li> <li>3. Quarterly updates to DMTs and to CMT on the delivery of the existing MTFS savings.</li> <li>4. Additional savings via vacancy factor lessen the impact of non-delivery of some MTFS projects.</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status
Continue to monitor and report on the MTFS programme - new proposals and progress of the MTFS programme reported to CMT at regular intervals.	Reduce Likelihood	Staff	J Rowney	Ongoing	In progress

Risk Title – 20. School sufficiency and financial viability	Risk Scores	Existing Controls			
<p><b>Risk:</b> The Council is unable to collaboratively manage the reduction in demand for school pupils, putting at risk the viability of the current pattern of school provision. Schools are not sufficiently secure to respond to financial challenge from reduced pupil numbers and tighter national financial settlement.</p> <p><b>Cause:</b> A continued and significant reduction in pupil demand reflective of reduced birth and fertility rates within inner-London, reduction in pupil yield from new housing and an increase in migration out of Borough. Real terms' reduction in school level funding over the medium term.</p> <p><b>Consequence:</b> Further reductions may be required in the number of school places in the borough beyond the difficult decisions that the Council has already taken to close schools and reduce pupil numbers. This may lead to adverse publicity, a breakdown of relationships between Camden, Camden Learning and Camden Schools and strain on community relations. Significant unplanned reductions in pupil numbers placing significant strain on school resources. Unfunded increased cost within schools put additional pressure on existing school budgets.</p> <p><b>Risk Update:</b> The Council continues to monitor and respond to changes in demand. On top of the existing reduction of over 300 reception school places, the Council for entry in 2024 supported the temporary capping of 3 further schools. Whilst school roll forecasts have shown a gradual stabilisation in the demand for pupil places in the medium-term significant vacancies remain in a small number of specific schools. Reductions in demand for primary school places is also leading to reduction in demand for secondary school places. Individual secondary schools have already seen significant reductions in applications. Whilst school balances have remained stable, with culminative school deficits being less than 10% of schools' collective surplus and not therefore a risk to general fund, significant strain will be placed on some individual school budgets over the coming period reflecting diseconomies of scale for schools with reduced pupil intake.</p>	<p><b>Current Score:</b> L:3 I:3</p> <p><b>Target Score:</b> L:3 I:3</p> <p><b>Gap to target:</b> L:0 I:0</p>	<ol style="list-style-type: none"> <li>Officers work closely with Council asset managers to ensure that options offer value for the Council and are flexible to deal with future changes in demand and that options are appropriate costed in relation to capital requirements.</li> <li>Officers work with allied services (early years, SEND) to explore synergies in the delivery of services in relation to options pertaining to school organisation.</li> <li>Council has developed and approved and is implementing the Camden Education Strategy 'Building Back Stronger', with a specific focus on increasing collaboration between schools.</li> <li>Council has set up a school places planning group of key officers and school leaders to review and approve school organisation strategy alongside specific implementation plan.</li> <li>Officers continue to review pupil demand data and share this with wider education stakeholders, this includes working with Secondary schools to monitor and manage reductions in demand for places in this sector.</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status
Delivery of Camden Education Strategy	Reduce likelihood	Allocated resources cabinet decision	T. Aldridge	2030	In progress
Monitor changes in government policy related to the School Governance	Reduce likelihood	Staff	T. Aldridge	Ongoing	In progress

Risk Title – 21. Differential Pupil Achievement	Risk Scores	Existing Controls			
<p><b>Risk:</b> Sectoral differences between the outcomes of pupils within Camden may increase including under-performance of disadvantaged groups.</p> <p><b>Cause:</b> There are multivariate issues that contribute to differential pupil achievement. For example, these include, parental involvement and ability to engage with children’s education (barriers including language) school attendance, highlighted differential access to education for different socio-economic groups e.g. disparity in access to internet enabled devices (digital divide).</p> <p><b>Consequence:</b> Camden children, particularly those in disadvantaged groups may not achieve their full academic potential, this may have a greater impact on vulnerable pupil’s educational outcomes. Negative impact on reputation of Camden Schools.</p> <p><b>Risk Update:</b> Preliminary performance data for 2024 (formal validation Jan 25) indicate that Camden Schools’ performance in statutory examinations has held up well in relation to national and London comparators especially within the Primary Sector. In line with national trends, we are experiencing a widening of gap between disadvantaged groups within the wider Camden cohort. The Council has recommissioned Camden Learning to provide school improvement and wider services to schools for a period of three years. The commission includes a specific emphasis on closing attainment gaps for underachieving pupil cohorts and a process for reporting against this.</p>	<p><b>Current Score:</b> L:3 I:3</p> <p><b>Target Score:</b> L:3 I:3</p> <p><b>Gap to target:</b> L:0 I:0</p>	<ol style="list-style-type: none"> <li>Camden Learning is specifically commissioned to focus on closing attainment gaps between different socio-economic groups</li> <li>Council has developed, approved and is implementing the Education Strategy ‘Building Back Stronger’, resource has been provided to manage the goal of every child being a reader by 7.</li> <li>Council is embedding its Early Years strategy and approach including investing in 1001 days and the PCPS programme.</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status
Consistent and timely oversight and management of the Camden Learning Commission	Reduce impact and likelihood	Financial/Staff	T. Aldridge	Ongoing	In progress
Implement Building Back Stronger strategy	Reduce likelihood	Staff	T. Aldridge	Ongoing	In progress



Risk title – 22. Fire Safety (in relation to high rise private building owners)	Risk Scores	Existing Controls
<p><b>Risk</b> - Private sector accommodation in tall residential buildings may be non-compliant with current fire safety standards and a major fire could lead to accusations of the council not taking appropriate enforcement action. The Council has a statutory duty to investigate and take action where relevant hazards (fire) established, under the Housing Act 2004.</p> <p><b>Cause</b> - A lack of response and/or investment and/or pro-active property improvement from private sector owners/managers in response to changes in fire safety standards for tall residential buildings. Limited local government enforcement powers. Length of time for buildings to be remediated.</p> <p><b>Consequence</b> - Potential harm to residents, disruption of council service if required to rehouse tenants in the event of significant fire. Reputational risk although primary legal duty is with private building owners/managers.</p> <p><b>Risk Update –</b> The gateway of the new building safety regime under the new Fire Safety Act has started so building control and planning are ensuring that all relevant new builds will meet the higher fire standards. Remediation Orders are now available to protect leaseholders from costs associated with remediating defects with cladding and associated fire precautions. High risk mid-rise properties are being inspected as part of the Councils duties under the Housing Act 2004. There are currently three appeals against Improvement Notices served. Remaining cases will be more complex, challenging and subject to greater resistance from owners. Looking forward the council might be expected to look at a larger number of medium rise properties and consequent need to increase resourcing. Expectation that resourcing will be needed for at least 10 years. Circa 25% of privately owned medium/high rise residential properties in Camden require remedial work to improve fire safety, however the dangerous ACM has been dealt with and removed in larger blocks, remaining ACM is being dealt with as we go forward.</p>	<p><b>Current Score:</b> L:3 I:3</p> <p><b>Target Score:</b> L:3 I:3</p> <p><b>Gap to target:</b> L:0 I:0</p>	<ol style="list-style-type: none"> <li>1. We are working with the London Fire Brigade (LFB), to address the residential high and medium rise buildings with the highest risks. These are being monitored closely and Housing Act enforcement notices have been served, as applicable.</li> <li>2. External Wall Fire Safety Remediation work continues at several properties across the Borough, with progress being monitored by the service.</li> <li>3. Move to evacuation policies in some flats, alarm systems in place.</li> <li>4. Housing Act 2004 Duties – service of improvement notices and enforcement action where no progress (18 served to date).</li> <li>5. Continued joint working with the Joint Inspection Team and LFB where appropriate to ensure coordinated approach to resolving high risk properties.</li> <li>6. Internal audit review of processes around fire safety in connection with cladding concluded with 4 medium recommendations being fully implemented.</li> </ol>

Action	Expected impact	Resources required	Owner	Due Date	Status
Monitor the development of the Fire Safety Act and Building Safety Act reforms. Continue appropriate enforcement action.	Inform service planning moving forward, reduced likelihood	Staff time	G Marston	Ongoing	In progress
Monitor MHCLG guidance and future directions	Inform service planning moving forward, reduced likelihood	Staff time	G Marston	Ongoing	In progress

Risk Title – 23. Compliance Against Consumer Standards	Risk Scores	Existing Controls			
<p><b>Risk:</b> Breach of consumer standards as a landlord (including tenant management organisations)</p> <p><b>Cause:</b> Non-adherence to or insufficient policies and procedures, insufficient resources</p> <p><b>Consequence:</b> Impact on resident well-being, reputational damage, regulatory action in line with the Social Housing (Regulation) Act 2023</p> <p><b>Risk Update:</b> The Social Housing (Regulation) Act provides new enforcement powers for the Regulator of Social Housing (RSH) to tackle landlords who are failing to meet their consumer standards. Consumer Standards are the measurable quality and performance standards that the providers of registered social housing must meet so that tenants live in safe, good quality homes and can hold their landlords to account.</p> <p>Under the new Act, all social housing landlords are required to report annually on 22 Tenant Satisfaction Measures (TSMs). 12 of these indicators are measured through tenant surveys, and 10 are measured through management data. Camden’s first TSM report was submitted to the regulator in June 2024, covering the period 1 April 2023 to 31 March 2024. The Regulator of Social Housing will be carrying out analysis of the data submitted and will publish its findings in the Autumn 2024.</p> <p>In time the Council will receive an inspection, and this will determine the Council’s compliance score. The scoring system ranges from C1 to C4, with C1 or C2 being a compliant position. To date no London boroughs have secured a score of C1 or C2. The Regulator has indicated that the Council will not be inspected until the current Regulatory Notice has been lifted. It is therefore likely that the Council’s first inspection will take place in 2025/26. In the meantime, a third-party specialist has been appointed to assist the Council in a self-assessment on the Council’s TSM management data, and their report is expected in December 2024. A self-assessment has already been carried out against the Consumer Standards to inform the Council’s workplan and priorities. It is noted that the Consumer Standards are very detailed, and it is considered likely that the Council will need time to achieve full compliance.</p>	<p><b>Current Score:</b> L:3 I:3</p> <p><b>Target Score:</b> L:1 I:3</p> <p><b>Gap to target:</b> L:3 I:0</p>	<ol style="list-style-type: none"> <li>1. Housing Safety and Regulatory Board, chaired by the Executive Director Supporting Communities.</li> <li>2. Continued self-assessment against the consumer standards through the commissioning of third party expertise as required</li> <li>3. Third party assessment of compliance on TSM management measures</li> <li>4. Detailed review of the performance measures being introduced by the Regulator and benchmarking against comparator organisations</li> <li>5. Proactive dialogue with the Regulator as part of its more focussed discussions on the Regulatory Notice</li> <li>6. New governance arrangements in place to monitor progress, chaired by Executive Director Supporting Communities</li> <li>7. Alignment of the Housing and Repairs transformation programme with the requirements of the Consumer Standards</li> <li>8. Detailed work on the stock condition survey outputs, the forecast decent homes position and the development of the Asset Management Strategy</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status
Review findings of third-party expert assessment against TSM management measures.	Reduced overall score	Housing transformation team in place	G. Marston	Jan 2025	To commence Q3 2024/25
Proactive engagement with Regulator as part of ongoing work on Regulatory Notice	Reduced overall score	Housing transformation team in place	G. Marston	Ongoing	In progress
Continued work to review the Council’s position against the Consumer Standards	Reduced overall score	Housing transformation team in place	G. Marston	Ongoing	In progress

Risk Title – 24: Complaints in housing repairs	Risk Scores	Existing Controls			
<p><b>Risk:</b> Inefficient and non-compliant handling of complaints leads to escalation of cases and referrals to Housing Ombudsman</p> <p><b>Cause:</b> Tenants dissatisfaction with housing repair services quality, timeliness and communication, increase in number of complaints put pressure of staff workloads, inadequate complaint handling systems and processes</p> <p><b>Consequence:</b> Financial pressures due to increased number of compensation payments and costs in responding to legal claims, reputational damage, regulatory action by Housing Ombudsman</p> <p><b>Risk Update:</b> There has been an increase in the number of complaints received by the Council in recent years. This trend is primarily driven by a significant increase in repair complaints, for issues such as damp and mould, which have been seen across all housing providers. Between 1 April 2022 and 31 March 2023, there was a 100% increase in Stage 1 complaints (total 2,431 complaints) and the increase has continued during 2023/24. Camden’s proactive outreach has resulted in significantly increased reporting. There has also been an increase in the number of cases referred to the Housing Ombudsman (HO). The Housing Ombudsman’s Complaint Handling Code was updated and became a joint Code with the Local Government and Social Care Ombudsman (LGSCO) and compliance with the Code became mandatory for all Social Housing Landlords from 1st April 2024. HO has started to increase the severity of their findings on cases escalated to them for review. They have also raised the level of compensation awarded to tenants by local authorities from a total per annum of £3k to £77k. The Housing Ombudsman has been conducting an investigation into Camden’s handling of leaks, damp and mould, complaints, and repairs. This is in line with their overall increased focus on local authorities. The findings are expected to be published in November 2024. Any recommendations will be implemented across all complaints handling, not just housing repairs. Nationally, there has been a 323% increase in serious findings against social housing landlords regarding poor-quality services. The Central Complaints team is working closely with service areas to ensure ongoing improvements in complaints handling and will be part of the group that leads the response to the Housing Ombudsman.</p>	<p><b>Current Score:</b> L: 3 I: 3</p> <p><b>Target Score:</b> L: 2 I: 1</p> <p><b>Gap to target:</b> L: 1 I: 2</p>	<ol style="list-style-type: none"> <li>9. Annual self-assessment on compliance with Housing Ombudsman Complaints Handling Code (new regulatory requirement from April 2024)</li> <li>10. Annual Complaints Handling and Service Improvement Report (new regulatory requirement from April 2024)</li> <li>11. Annual Complaints Report to monitor trends and identify areas for improvements.               <ol style="list-style-type: none"> <li>1. A new case management system introduced which allows a webform directly into the system and allows all complaints to be better managed</li> <li>2. Increased our staff resources to reduce delays in handling complaints at all process stages.</li> <li>3. All compensation offered is reviewed by the case management team leader or head of service before submission to the resident.</li> <li>4. Expanding the Housing case management team role to include both repairs and neighbourhood complaints case management in one place, to ensure cohesive responses.</li> <li>5. Creation of a new post – Lessons Learned Lead – that will lead a service improvement hub</li> <li>6. Creation of the Housing Customer Oversight panel that reviews current trends and concerns and improvements needed going forward</li> <li>7. Neighbourhood Liaison Team that works in a customer-focused, joined-up way to resolve complex case work across the repairs service and neighbourhood housing services.</li> <li>8. Internal Audit review of complaint handling with actions and recommendations for improvement.</li> </ol> </li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status
Complaints Improvement Group created to develop a Complaint Handling Improvement Plan and to implement the plan	Reduce Likelihood and Impact	Staff	Jon Rowley / Gillian Marston	Spring 2025	In Progress
Housing Ombudsman – Implement recommendations following the outcomes of the special investigation	Reduce Likelihood and Impact	Staff	Jon Rowley / Gillian Marston	Spring 2025	Planned
Implement changes to case management processes to ensure effective collaboration between teams to resolve complaints.	Reduce Likelihood and Impact	Staff	Jon Rowley / Gillian Marston	End 2024	In progress

Risk Title – 25. Contract Management and Procurement	Risk Scores	Existing Controls
<p><b>Risk</b> - Non-compliance with new requirements introduced by the Procurement Act 2023.</p> <p><b>Cause</b> - The new regulations introduce major changes in ways of working and requires the Council to adapt our existing procurement and contract management processes and train our staff.</p> <p><b>Consequence</b> – Failure to comply can lead to legal challenges by suppliers, legal penalties, financial losses and reputational damage. This can result in inefficient procurement processes and delays/disruption in service delivery.</p> <p><b>Risk Update –</b>  The new regulations on procurement, which incorporates increased elements of contract management, has been introduced to begin 24 February 2025. Contracts awarded before then will continue to sit under old regulations, and contract managers will need to manage parallel processes and requirements for the next few years. The team are rolling out training to relevant teams that carry out procurement. Offers of 1:1 support to contract managers where needed. Contract managers are also encouraged to use internal online staff forums to share learning and best practice.</p> <p>The Act introduces Conditions of Participation where the Council must ensure that suppliers have the legal, financial and technical capacity to deliver the contract requirements.</p> <p>The team are continuing conversations with contract managers to ensure robust supply chain review and management and that contingency plans are in place in the event of supplier failure. Central Government is setting up a compliance review unit which will monitor compliance with the Act.</p> <p>Contract managers are responsible for timely escalation of supply chain issues to DMTs and Executive Directors.</p>	<p><b>Current Score:</b> L:3 I:3</p> <p><b>Target Score:</b> L:2 I:3</p> <p><b>Gap to target:</b> L: 1 I: 0</p>	<ol style="list-style-type: none"> <li>Each Directorate owns their individual contracts and should monitor the risks for the contracts, with support from procurement as and when required.</li> <li>Contract Management guidelines are published on Essentials</li> <li>Bespoke training and 1:1 support provided to contract managers and teams</li> <li>Contract register for corporate overview and support to contract managers</li> <li>Updating Procurement Board papers to incorporate the notices required to be published under the Act.</li> <li>Contract Managers Forum on Teams and Viva Engage sharing requirements, guidelines and best practice processes.</li> </ol>

Action	Expected impact	Resources required	Owner	Due Date	Status
Engage with contract managers to raise awareness of their new responsibilities in relation to publishing notices and managing and reporting on supplier performance.	Reduce Likelihood	Staff	G. Marsden	Ongoing	In progress
Develop and launch new training module on contract management that incorporates the new regulations.	Reduce Likelihood	Staff/L&D	G. Marsden	Apr 2025	In progress
Complete project to update of contract register and make improvements to the functionality of the system and create usable pipeline.	Reduce Likelihood	DDS/Finance staff	G. Marsden	Dec 2024	In progress
Review functionality of IT systems to support the digital and transparency requirements of the Act.	Reduce Likelihood	DDS/Staff	G. Marsden	Apr 2025	In progress

Risk Title – 26. Housing Delivery	Risk Scores	Existing Controls			
<p><b>Risk</b> - The Council does not meet overall housing targets as set out in the London Plan</p> <p><b>Cause</b> - Housing Market turbulence and/or slowdown in the housing market impacting developers (including private developers, housing associations). Targets are challenging, with Camden’s annual housing delivery only once exceeding the current target.</p> <p><b>Consequence</b> - Potential reduction in the control of our planning decisions and penalties for not meeting the Housing Delivery Test target. Social impact of residents in need of affordable housing and difficulties getting residents off the council housing waiting list. Risk to the updated Local Plan being found ‘sound’ by Planning Inspector at public examination if the Council cannot demonstrate it can meet housing need.</p> <p><b>Risk Update -</b>  Housing delivery in Camden in 2023/24 showed an improvement from recent years but delivery over the past four years has been less than half of the borough’s challenging housing target. Housing delivery faces a number of challenges, e.g. build cost increases; changes to building safety regulations, competition for limited sites from developers of commercial space; the length of time taken for applications for larger scale development sites to come forward; and uncertainty over national changes to planning policy.</p> <p>The new government has consulted on tightening the national approach to housing delivery and targets, which was relaxed by the previous government in late 2023 and has announced that planning regulations will be reformed although the details are not yet known.</p> <p>The GLA is starting to review the London Plan and has begun work on assessing borough capacity for future housing development. which will inform the allocation of London’s housing need between the boroughs as housing targets in the next London Plan. The Council will be engaging in this process and the London Plan review to seek to ensure Camden’s future housing targets are set an appropriate level.</p> <p>Future housing capacity in the borough is limited due to reduced number of suitable sites, which means the future target for Camden should be lower than previously, although this will be set in the context of a new London Plan which will be planning for a significantly higher Londonwide housing target. Outputs of the housing capacity work are due to be made available in Spring 2025. It is anticipated that a draft revised London Plan will be published in late 2025.</p>	<p><b>Current Score:</b> L:4 I:2</p> <p><b>Target Score:</b> L:3 I:2</p> <p><b>Gap to target:</b> L:1 I:0</p>	<ol style="list-style-type: none"> <li>1. Local Plan</li> <li>2. Planning frameworks (for each growth area)</li> <li>3. Intelligence gathering and frequent communications with key development partners to understand current issues.</li> <li>4. Housing Delivery Action Plan produced in 2020, 2021 and 2022. An Action Plan for 2024 is being produced now the Housing Delivery Test is no longer on hold.</li> <li>5. Engagement with GLA on London wide housing capacity work and the update to the London Plan to ensure achievable targets for Camden for the next plan period.</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status
Deliver Housing Delivery Action Plan, including monitoring the pipeline of sites	Reduce likelihood	Staff	G Marston	Ongoing	In Progress
Review of housing and other planning policies in the Camden Local Plan and allocating sites for housing provision across the borough in the Plan	Reduce likelihood	Staff	G Marston	Ongoing	In Progress
Participation in London-wide housing capacity work and the review of the London Plan	Reduce likelihood	Staff	G Marston	Autumn 2024 onwards	In Progress

Risk Title – 27. Emergency Preparedness, Response and Recovery	Risk Scores	Existing Controls			
<p><b>Risk</b> - Council lacks appropriate preparedness and resilience in response to a major incident.</p> <p><b>Cause</b> - Lack of resource, availability of wider resource network (on-call). IT system reliance. Incomplete/out of date Business Continuity Plans.</p> <p><b>Consequence</b> - Failure to provide appropriate resources for residents, businesses or visitors and/or sustained inability to deliver critical services.</p> <p><b>Risk Update:</b> The Emergency and Contingency Planning Review commissioned earlier this year has influenced the development of a number of Council emergency response and contingency planning related policies, procedures and operating practises. The developments have been designed to further strengthen the cross-council approach towards emergency planning. The review has also focused on priority areas such as community resilience in order to oversee the development of emergency response and recovery procedures with an increased focus on working in partnership with local communities particularly during the immediate emergency response and recovery phases.</p> <p>Business continuity and risk management have also formed a key part of the ongoing Emergency and Contingency Planning Review. Revised procedures have been developed to ensure a consistent cross-council approach towards business continuity planning. The Council's emergency planning, community safety and community cohesion related services were mobilised effectively in order to inform the Council's approach towards mitigating the impact of the civil unrest which impacted parts of the UK in July/August this year.</p>	<p><b>Current Score:</b> L:2 I:3</p> <p><b>Target Score:</b> L:2 I:3</p> <p><b>Gap to target:</b> L:0 I:0</p>	<ol style="list-style-type: none"> <li>Emergency Management and Business Continuity (EMBC) team has increased the number of emergency stock locations and added courier options to transport accounts for use in an emergency.</li> <li>Each Service is required to have their own Business Continuity Plan (BCP). EMBC are working with Audit to help improve the quality and assurance of effective BC planning. Services holding critical activities have been given additional support.</li> <li>Majority of the team holds a professional qualification in BC.</li> <li>The EMBC team provides BCP templates and training, based on an online accessible platform.</li> <li>A Resilience Working Group has been established and is stood up as needed; chaired by Director Public Safety it delivers the strategic direction of CRAG and is prepared "Silver" group to respond to significant emergencies.</li> <li>Duty on call function: There has been an increase in the number of on call trained staff to respond to emergencies, including the development of new roles as well more staff trained to cover existing duty on call roles.</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status
Ongoing evaluation of the revised out of hours emergency response rota and the development of standard operating procedures to enhance the organisational response to both civil emergencies and serious/critical incidents.	Reduce impact	Financial/Staff/IT	G Marston	Ongoing	In progress
Deliver a programme of business continuity training and exercises for senior leadership	Reduce Likelihood and impact	Staff	G Marston	Dec 2025	Planned
Appoint business continuity champions in all services to support BC planning and awareness	Reduce likelihood and impact	Staff	G Marston	Dec 2025	Planned

Risk Title – 28. Energy Costs	Risk Scores	Existing Controls			
<p><b>Risk:</b> Long term volatility and inflation of energy market cause unaffordable budget pressures for the Council, Schools and Council housing tenants</p> <p><b>Cause:</b> Unpredictable global energy market, inadequate monitoring of energy prices and Council expenditure, unfavourable terms and conditions from energy providers, services do not adapt budgets/activities/energy consumption to meet pressure in energy expenditure. Failure to recover true energy costs from housing tenants through heating charges.</p> <p><b>Consequence:</b> Significant overspend on Council budgets or contributions required towards the housing heating pool, key projects and programmes scaled down, paused or cancelled.</p> <p><b>Risk Update:</b> Global energy markets have stabilised significantly over the past 18 months and the prices for the 12 month supply period beginning in October 2024 are forecast to see a c.40% cost reduction for gas and c.24% reduction for electricity.</p> <p>Approximately £20m of external funding has been secured over the last 3 years to deliver a range of energy efficiency improvements across our estate to provide long term protection from energy cost inflation.</p> <p>The risk score is for the period October 2024 to September 2025 and is on target.</p>	<p><b>Current Score:</b> L: 3 I: 2 (-1)</p> <p><b>Target Score:</b> L: 3 I: 2</p> <p><b>Gap to target:</b> L: 0 I: 0</p>	<ol style="list-style-type: none"> <li>Continued use of a Central Purchasing Body (CPB) to manage risk through forward buying. Using a CPB allows Camden to achieve the best price for the Council and residents by aggregating the Council's required energy consumption with the CPB's other customers (235 public sector organisations, with a combined energy spend of over £800 million). Energy market volatility is managed by forward purchasing energy from the wholesale markets in the run up to the supply period.</li> <li>Energy management function in Sustainability, Air Quality and Energy team to validate billing against contract prices, expected consumptions and meter reads.</li> <li>Provide quarterly energy price forecasts in the 12 months prior to any new supply period to ensure that all budget holders have sufficient information to budget effectively.</li> <li>Develop and deliver the retrofit programme for the council's corporate and housing estate to improve energy efficiency</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status
Deliver purchasing strategy for Oct 2024 – Sept 2028	Reduce score	Staff	G. Marston	Ongoing	In progress
Continue to deliver the retrofit programme for Council homes, schools and corporate buildings targeting all Government funding streams.	Reduce score	Staff	G. Marston	Ongoing	In progress

Risk Title – 29. Equal Pay for Equal Value		Risk Scores	Existing Controls		
<p><b>Risk</b> - Failure to standardise employment terms across the Council.  <b>Cause</b> - Negotiations with staff remaining on the old employment terms and conditions.  <b>Consequence</b> - Equal pay claims and accompanying legal costs, reputational damage and workforce disruption. Unable to fulfil values of fairness and quality in Camden plan.  <b>Risk Update</b> - Work continues in moving the residual staff across to new contracts (c40 staff). With regard to school support staff the government have stated they will reinstate the School Support Staff Negotiating Body, to establish national terms and conditions, career progression routes, and pay rates. We are anticipating the details may be announced early/mid October and will review the impact at that stage. The risk profile may reduce as a result but it is too early to say at this stage.</p> <p>We are continuing with the review of elements of the pay scheme. We have introduced changes at our most junior grades and at the more senior grades to ensure our pay is competitive in the market. This included benchmarking our pay against the market and looking at changes that could be made to ensure the pay scheme meets the changing needs of the Council recognising the challenging economic conditions whilst minimising the potential for inequity to occur.</p>		<p><b>Current Score:</b> L:2 I:3 <b>Target Score:</b> L:2 I:2 <b>Gap to target:</b> L:0 I:1</p>	<ol style="list-style-type: none"> <li>1. We continue to monitor equal pay risk</li> <li>2. Independent assurance that our pay scheme is non-discriminatory</li> <li>3. We have reviewed and updated our job evaluation record keeping systems.</li> <li>4. We continue to review options for residual groups.</li> <li>5. Verification of our pay management arrangements and pay benchmarking</li> <li>6. Robust process for any pay exceptions</li> </ol>		
Action	Expected impact	Resources required	Owner	Due Date	Status
Review options for residual Council staff still on old contracts	Reduce likelihood and impact	Financial/Staff/	J Rowney	April 2025	Ongoing
Ongoing review of pay scheme	Reduce Likelihood and impact	Financial/Staff/	J Rowney	April 2024	In Progress
Review the details and impact of any School Support Staff Negotiating Body once the details have bn announced by government	Reduce Likelihood and impact	Financial/Staff/	J Rowney	Dec 2025	Planned



Risk Title – 30. Serious Fraudulent Activity		Risk Scores	Existing Controls			
<p><b>Risk:</b> Serious fraud or corruption  <b>Cause:</b> Lack of adequate governance arrangements, including key controls and fraud awareness  <b>Consequence:</b> Financial loss and reputational damage to the Council as a result of fraud  <b>Risk Update:</b></p> <ul style="list-style-type: none"> <li>The Council continues to take a robust approach to anti-fraud, with timely reactive investigations being undertaken. Annual reports are presented to the Audit and Corporate Governance Committee.</li> <li>The Anti-Fraud and Investigations Team (AFIT) continue to work with relevant services, providing oversight and control design advice, where needed.</li> <li>The team is continuing to manage the reactive case load alongside the programme of proactive anti-fraud activity including engagement with the enhanced National Fraud Initiative.</li> <li>AFIT liaise with the Council's other investigations teams (such as housing and parking) as well as the London community via the London Borough fraud investigators group.</li> </ul>		<p><b>Current Score:</b> L:2 I:2 <b>Target Score:</b> L:2 I:2 <b>Gap to target:</b> L:0 I:0</p>	<ol style="list-style-type: none"> <li>Fraud risks feed into the annual Internal Audit Plan. Delivery of the Audit Plan ensures that recommendations are made to address control weaknesses. Review of governance arrangements during individual audits routinely include a review of policies and procedures.</li> <li>A mandatory anti-fraud training module is in place. New employees are required to complete the fraud awareness module.</li> <li>A well-resourced and qualified investigations team is in place, the team pro-actively keep abreast of industry alerts.</li> <li>The Internal Audit team continue to alert AFIT should any potential fraud risks be flagged during audit investigations.</li> <li>Camden has a zero-tolerance approach to fraud which is well publicised.</li> <li>Whistleblowing arrangements are in place.</li> <li>Fraud awareness workshops – tailored presentations and practical exercises for identified risk areas or provided on request.</li> <li>A rating system is in place for investigations to risk assess new referrals.</li> <li>An Anti-Fraud and Corruption Strategy and whistleblowing policy is in place.</li> <li>Regular AFIT (Audit Fraud and Investigation Team) meetings – review caseloads and lines of enquiry on an ongoing basis.</li> </ol>			
Action	Expected impact	Resources required	Owner	Due Date	Status	
Continue to engage in the National Fraud Initiative	Reduce likelihood	Staff	J Rowney	October 2025	In progress	