

<b>LONDON BOROUGH OF CAMDEN</b>	<b>WARDS:</b> All
<b>REPORT TITLE:</b> Principal Risk Report 2025	
<b>REPORT OF:</b> Director of Finance	
<b>FOR SUBMISSION TO:</b> Audit and Corporate Governance Committee	<b>DATE:</b> 27 November 2025
<p><b>SUMMARY OF REPORT</b></p> <p>This report provides an update on the action being taken to mitigate key principal risks and presents the Council's position as at October 2025. 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.</p> <p><b>Local Government Act 1972 – Access to Information</b></p> <p>No documents were used in the preparation of this report which are required to be listed.</p> <p><b>Contact Officer:</b>  Nasreen Khan  Head of Internal Audit, Investigations and Risk Management  5 Pancras Square  London  N1C 4AG  Telephone: 020 7974 2211  Email: <a href="mailto:nasreen.khan@camden.gov.uk">nasreen.khan@camden.gov.uk</a></p>	
<p><b>RECOMMENDATIONS</b></p> <p>The Committee is asked to:</p> <ol style="list-style-type: none"> <li>1) Note the Council's principal risks and actions being taken to mitigate risks;</li> <li>2) Agree two areas for risk deep dives in 2026.</li> </ol>	

Signed: As agreed by the Director of Finance

Date: 14<sup>th</sup> November 2025

## 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 2025.
- 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 2024. Overall, the report details:
  - **Appendix 1: Principal Risk Map and Impact Matrix** – 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: How areas of risk link to 'We Make Camden'** – maps the links between risks and We Are Camden themes;
  - **Appendix 3: Executive summary** of the principal risk register
  - **Appendix 4: Principal Risk Register** - details the risk information for each risk, including the actions that will be taken to achieve the target risk score.

## 2. Principal Risk Overview

- 2.1. Local authorities continue to operate in a multifaceted risk context shaped by financial constraint alongside increasing demand for services. Camden's overall risk profile is reflective of the risk environment the Council is operating in, with high levels of uncertainty and pressures on local authorities nationally. Key themes identified through conversation with Camden risk leads include:

**i) Financial sustainability:** Local authorities across the country continue to manage significant financial pressures. The Government has been consulting on the Fair Funding Review 2.0 which will change the way funding is allocated between councils. It is expected that the reforms will include a re-distribution of funding away from London, which could have a detrimental impact on Camden's funding settlements going forward. Camden Council has been fully engaged in the consultation process and the outcomes are expected to be announced alongside the Local Government Policy Statement in Autumn 2025. The return to three-year financial settlements from 2026/27 is a positive step for local authorities and will support longer term planning.

**ii) Recruitment and retention:** Although the labour market seems to be easing, there continues to be challenges to recruitment and retention in specialist areas, due to shortage of skilled staff, particularly in technical, professional, and care roles. Budget constraints limiting the Council's ability to compete with other sectors is also a factor. This is impacting several principal risks areas relying on specialist capabilities, such as Adult Safeguarding, Landlord Duty of Care, and Safeguarding Children. Camden continues to investment in fair pay, expanded benefits, cultural transformation,

enhanced well-being support, and stronger development pathways to mitigate the challenges of a competitive recruitment market.

**iii) Meeting the needs of residents:** Demographic changes, increased complexity of need and the cost-of-living crisis is putting increased pressure on council services. Both adult and children's social care services have seen an increase in referrals. The number of households in need of temporary accommodation and other homelessness support is creating significant pressures on services to meet the Council's statutory duties in this area. The Council is delivering a range of activities and services to support the financial resilience of Camden households, including supporting families and individuals to access the benefits they are entitled to.

## **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 29 principal risks in total, which reflects the level of risk exposure in relation to delivering the ambitions set out in 'We Make Camden'. Four risks have reduced risk scores since the last report (Safeguarding Adults, Community Investment Programme, Information Governance, Occupational Health and Safety). Two risks have an increased risk score (Emergency Preparedness and Response, Breakdown in Community Cohesion).
- 2.3. Despite some progress in reducing the overall risk exposure, the Council continues to operate in a heightened risk environment, with the majority of principal risks sitting outside of the agreed target score (21 risks of 29 in total). Target risk scores included in the principal risk register demonstrate the risk level that the Council considers is within its risk appetite and that the organisation is working towards achieving or maintaining.
- 2.4. One new risk has been escalated to the principal risk register, and two risks have been removed. Details on the new and closed risks are included in section 3 and 4 below.

## **3. New risk**

- 3.1. One new risk has been escalated to the principal risk register, as set out below (with further details in Appendix 4).

**Risk title:** Special Educational Needs and Disability (SEND) Funding and Provision

**Risk Description:** There are ongoing and systemic pressures on the sustainability of SEND funding and provision, both nationally and locally. London Councils forecast a £500m cumulative deficit in SEND provision by the end of 2026/27, reflecting the scale of financial challenge across the region.

**Reason for adding:** Over the past year, Camden's SEND service has experienced sustained pressure. This is caused by several factors such as a significant increase in the number and complexity of children with Education Health and Care Plans, Government funding not keeping pace with demand, recruitment and retention challenges and a fragmented system across partner agencies. Camden is actively involved in the Department for Education's development of SEND reforms, including changes to funding arrangements. Internally, Camden has restructured its SEND service to improve delivery and support to children and families. Given the severe

pressures the service is experiencing, it is appropriate to escalate this risk to the principal risk register for corporate oversight.

#### **4. Removed risks**

- 4.1. The risks 'Energy Costs' and 'Equal Pay for Equal Value' have been de-escalated from the principal risk register and will continue to be managed and monitored at directorate level. Justifications for the de-escalation are included below.

##### **4.2. Energy Costs**

**Risk description:** Long term volatility and inflation of energy market causes unaffordable budget pressures for the Council, schools and Council housing tenants

**Justification:** Global energy markets have stabilised significantly over the past two years since the energy crisis of 2022/23. After last year's fall in prices, the prices for the twelve-month supply period beginning in October 2025 are forecast to see a relatively modest 2% increase for gas costs and no significant change for electricity costs. Approximately £25m of external funding has been secured over the last four years to deliver a range of energy efficiency improvements across our estate to provide long term protection from energy cost inflation. It has therefore been assessed that this risk can be removed from the principal risk register and continue to be managed at directorate level.

##### **4.3. Equal Pay for Equal Value**

**Risk description:** Failure to standardise employment terms across the Council.

**Justification:** The Council now has only circa 30 staff members on the old contractual terms and conditions, and this number continues to reduce as opportunities arise to move staff over or as they leave. With regards to school support staff, the Government is establishing the School Support Staff Negotiating Body, to establish national terms and conditions, career progression routes, and pay rates. Discussions are still ongoing via the Local Government Association and Government. Other staff groups on other terms and conditions have been given options to transfer/be appointed on Camden terms and conditions. The Council has had independent assurance that its pay scheme is non-discriminatory and equal pay risks continue to be kept under review. On this basis, the risk can now be removed from the principal risk register and continue to be managed and monitored at directorate level.

#### **5. Watchlist item**

- 5.1. The Coroner's service has been included as a watchlist item as the service is under severe pressure due to under-resourcing. The number of coroner officers, provided by the Police, is well below the number required (less than half of 12 are in post at the moment and there is no manager in post). The risk profile will change on 1 April 2026 as we take on full legal responsibility for the provision of all support. The service is currently provided across Inner North London on a tripartite basis i.e. Judicial (led by the coroner), investigative/court (coroner officers provided by the police) and administration/logistics (provided by Camden on behalf of Tower Hamlets, Islington, Hackney and Camden). This model is not optimal, and discussions are underway to

provide a single support model for the coroner provided by Camden Council. The target is for this to be transferred on 1st April 2026.

- 5.2. This is a service that is provided to our communities at a time of great emotional distress and vulnerability. The Council is required to safeguard the dignity and security of the deceased (including mortuary services and coroner's service). The current resourcing challenges provide a higher chance of judicial challenge and non-compliance with regulatory regimes. One of the reasons Camden Council is accepting the Police's request early to transfer the coroner's officers to our control is in response to current issues with resources and service delivery. A full new structure has been developed with evaluated posts. Once the agreement is signed, we can move to recruitment ahead of the formal transfer. We will employ the strategic service lead ahead of the transfer to ensure smooth transfer. Despite mitigations the risk profile does change on transfer, and we will be transferring a service with a range of issues that will still need to be addressed. This risk is therefore flagged as potentially requiring escalation in the coming months.

## 6. Principal risk deep dives

- 6.1. Risk deep dives are presented to the Committee at regular intervals. 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 the Committee to hear directly from the risk lead. Areas previously presented to the Committee in the last three years are outlined below:

Principal Risk	Risk score at the time of the deep dive	Date of deep dive
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
Increasing homelessness	20	April 2025
Complaints in housing repairs	9	November 2025
Climate resilience and enabling a zero-carbon borough	16	February 2026 (scheduled)

6.2. The Committee is asked to agree a further two areas for deep dives in 2026 from the principal risk register as presented in Appendix 3.

## **7. Finance Comments of the Director of Finance**

7.1. The Director of Finance has been consulted, and comments are incorporated within the body of the report.

## **8. Legal Comments of Borough Solicitor**

8.1. The Borough Solicitor has been consulted, and comments are incorporated within the body of the report. Legal advice and support will be provided, where necessary, in relation to individual risks.

## **9. Environmental implications**

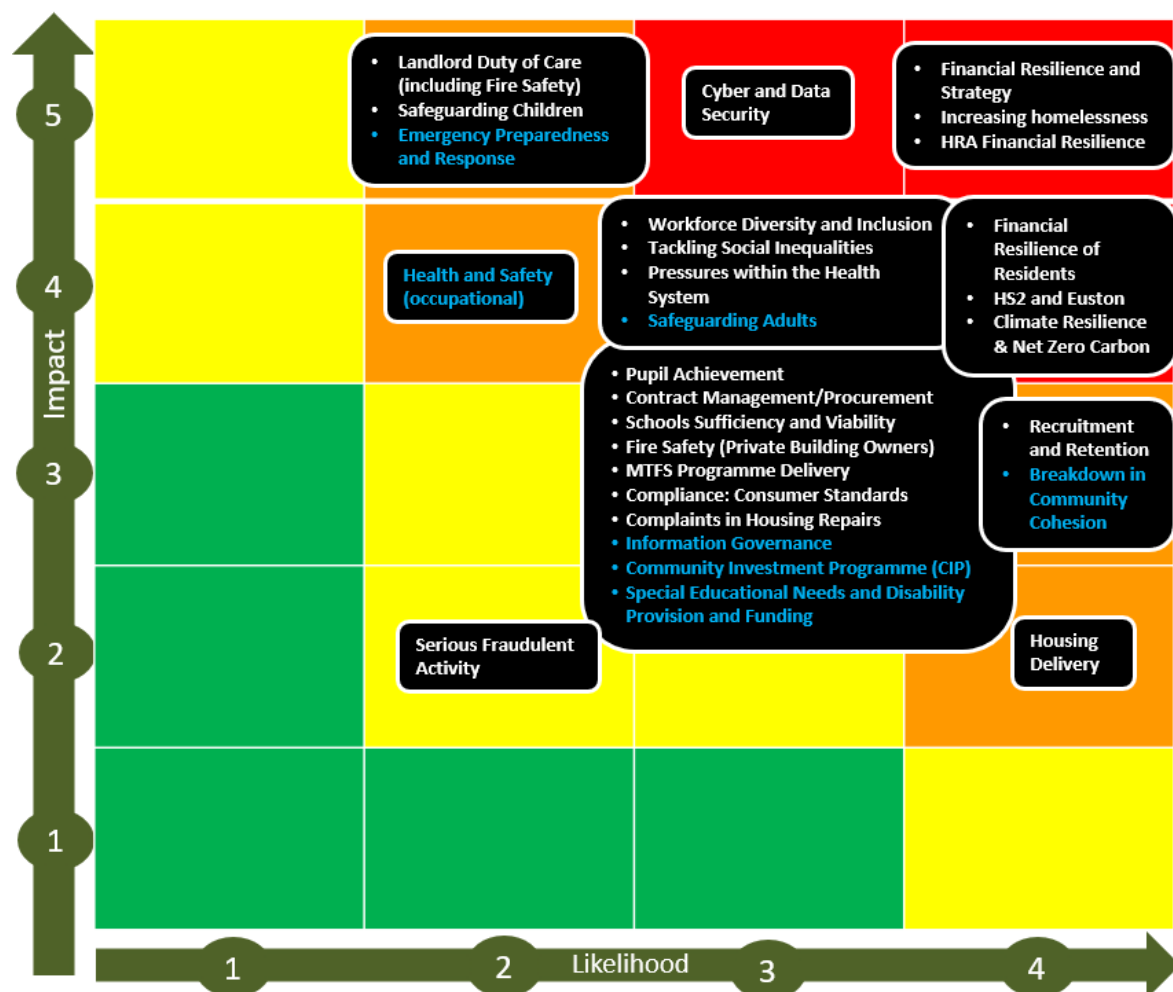
9.1. There are no known environmental implications arising from the presentation of this report. Environmental implications will be reviewed, where necessary, in relation to individual risks.

## **10. Appendices**

- **Appendix 1:** Principal risk heat map and risk impact matrix
- **Appendix 2:** How areas of risk link to 'We Make Camden' themes
- **Appendix 3:** Executive summary of principal risk register
- **Appendix 4:** Principal risk register - detailed information and action plans for each principal risk

**Appendix 1: Principal risk heat map and impact scoring matrix – October 2025** (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	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	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: How areas of risk link to 'We Make Camden' themes















### Appendix 3: Executive summary of principal risk register (Full risk register in Appendix 4)

(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 2024	Current Score	Target Score	Risk Title	CMT Risk Sponsor	Forward Trend	Comment on risk trend
-	L:4 I:5 Score <b>20</b>	L:3 I:1 Score 3	<b>1. Financial Resilience and Strategy -</b> Significant decline in the Council's financial sustainability and resilience (general funds)	<b>H. Mohamed / K. Myers / D. Omisore</b>		The Council faces acute financial pressures, with substantial overspends being forecast for five consecutive quarters. Officers are currently working to address the overspends and reduce them in-year. While the return of three-year financial settlements for local authorities from 2026/27 is a positive step, there is high uncertainty of what the outcomes of the Fair Funding Review 2.0 will mean for Camden. The forward outlook remains increasing.
-	L:4 I:5 Score <b>20</b>	L:2 I:1 Score 2	<b>2. Housing Revenue Account (HRA) Financial Resilience</b>	<b>H. Mohamed / K. Myers / G Marston</b>		The HRA remains under significant pressure. Q1 2025/26 overspends were primarily driven by disrepair cases, interest payments driven by increases in interest rates and contributions to the Major Repairs Reserve. £0.6m of savings has been added to the existing £11.41m savings commitment for the period 2023/24 to 2025/26. This risk presents a continued increased forward outlook for the next 12 months.
-	L:4 I:5 Score <b>20</b>	L:2 I:2 Score 4	<b>3. Increasing Homelessness</b>	<b>G. Marston</b>		Temporary accommodation continues to be a financial challenge for the Council, with £15.4m overspend forecasted for 2025/26 unless robust action is taken. The Council is working towards finding new, more financially stable options to meet this statutory duty. This risk is presenting as increasing over the next 12 months.
-	L:4 I:4 Score <b>16</b>	L:3 I:3 Score 9	<b>4. Financial Resilience of Residents</b>	<b>H. Mohamed / K. Myers</b>		Whilst inflation has come down, costs have not reduced, and many households rely on benefits or wages which have not kept pace with inflation. The labour market is showing signs of cooling which may lead to a rise in unemployment. The Council's continues to promote its support programme and ensure widespread uptake of available grants by residents facing hardship. The risk presents as stable at present for the next 12 months.

Change in score since Nov 2024	Current Score	Target Score	Risk Title	CMT Risk Sponsor	Forward Trend	Comment on risk trend
-	L:4 I:4 Score <b>16</b>	L:3 I:2 Score 6	<b>5. Improving Camden's Climate Resilience and enabling a zero-carbon borough</b>	<b>D. Burns</b>		The Council's new Climate Action Plan 2026-2030, which is currently under consultation, has an enhanced focus on climate resilience and risk. The increasing occurrences of extreme heat are becoming a key issue, with vulnerable people and infrastructure most at risk. Nine of the last ten summers (2016-2025) have seen above average temperatures. The forward trend presents as increasing over the next 12 months.
-	L:4 I:4 Score <b>16</b>	L:3 I:3 Score 9	<b>6. High Speed 2 and Euston</b>	<b>D. Burns</b>		The forward outlook has stabilised compared to last year, with the Government's commitment to bring HS2 to Euston station and the Council's proactive approach to lobbying for a locally led development corporation. However, the overall risk to the desired economic and social benefits remains high.
-	L:3 I:5 Score <b>15</b>	L:3 I:3 Score 9	<b>7. Cyber and Data Security</b>	<b>H. Mohamed / K. Myers</b>		The cyber risk environment continues to be challenging, with increasingly sophisticated methods used to target organisations. The Council continues to deliver its cyber security programme, including moving towards alignment with the national Cyber Assurance Framework. The forward outlook is assessed as increasing given the constantly changing nature of cyber risk.
-4	L:3 I:4 Score <b>12</b>	L:2 I:4 Score 8	<b>8. Safeguarding Adults</b>	<b>J. McGregor</b>		Demand for services continues to be high and recruitment and retention challenges remain. In February 2025, the CQC rated Camden services as Outstanding, recognising that there is strong leadership, oversight and partnership arrangements in place to address these challenges. The overall risk score has reduced to reflect this assurance of controls and mitigations. However, the outlook for the next twelve months is presenting as increasing given the challenging context in which the service operates.
-	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 integrated care system which Camden is a part of will be expanded from five to thirteen local authorities, alongside significant savings targets to Integrated Care Board operational budgets. The Council continues to engage closely with our partners to ensure resourcing and investment is aligned and effective and deliver quality outcomes for Camden residents. The forward outlook is as assessed as stable with a continued high-risk level.

Change in score since Nov 2024	Current Score	Target Score	Risk Title	CMT Risk Sponsor	Forward Trend	Comment on risk trend
-	L:3 I:4 Score 12	L:3 I:3 Score 9	<b>10. Failure to Challenge and Address Social Inequalities</b>	<b>H. Mohamed / K. Myers</b>	↔	The Council continues to embed an integrated approach to equality and intersectionality across directorates. Equalities and finance colleagues are working together on the upcoming Fair Funding Review 2.0, assessing its impact on social inequalities. The risk presents as stable for the next 12 months.
-	L:3 I:4 Score 12	L:2 I:2 Score 4	<b>11. Workforce Diversity and Inclusion</b>	<b>H. Mohamed / K. Myers</b>	↔	The results from the staff survey in November 2024 showed progress towards the Council's diversity and inclusion aims. Learning from the survey has informed a programme of work for further improvements and the forward outlook is assessed as stable for the next 12 months.
-	L:4 I:3 Score 12	L:2 I:2 Score 4	<b>12. Recruitment and Retention</b>	<b>H. Mohamed / K. Myers</b>	↔	Recruitment activity continues to be high in some areas, and skills shortages persist, particularly in technical, professional, and care roles, where private sector employers can often offer more competitive packages. Camden's Reward Strategy continues to evolve to meet these challenges and the forward outlook over the next 12 months is assessed as stable.
+3	L:4 I:3 Score 12	L:3 I:3 Score 9	<b>13. Breakdown in Community Cohesion</b>	<b>D. Burns / H. Mohamed</b>	↑	The challenges to community cohesion remain complex and unpredictable. Camden has experienced increases in hate crime, particularly antisemitic and Islamophobic offences, reflecting wider London trends. The Council continues to work with partners to share information and respond to local issues. This risk present with an increasing forward trend.
-	L:2 I:5 Score 10	L:2 I:5 Score 10	<b>14. Landlord Duty of Care – breach of statutory duties as a landlord</b>	<b>G. Marston</b>	↔	The Council is progressing the compliance programme related to the Fire Safety Act 2021 and the Building Safety Act 2022, as well as the action plan in response to the regulatory notice on fire risk assessment actions. There is also a plan in place on implementing recommendations from the Grenfell Inquiry report and new regulations expected to be published in the next three years. The forward outlook is assessed as stable.

Change in score since Nov 2024	Current Score	Target Score	Risk Title	CMT Risk Sponsor	Forward Trend	Comment on risk trend
-	L:2 I:5 Score <b>10</b>	L:2 I:5 Score 10	<b>15. Safeguarding Children</b>	<b>T. Aldridge</b>		There continues to be an increased pressure on children's social care services. The Council is responding to the national reform agenda with a transformation programme aimed to shift focus from crisis intervention to early support and prevention. Sufficiency of care placements is an ongoing challenge in the sector and the forward trend is presenting as increasing.
+4	L:2 I:5 Score <b>10</b>	L:2 I:3 Score 6	<b>16. Emergency Preparedness, Response and Recovery</b>	<b>D. Burns</b>		A review of requirements against resilience legislation and standards has identified a number of critical workstreams to deliver to ensure capacity and capability for effective incident response. Until this work is delivered, the risk is assessed as increased compared to the last report. With a clear workplan in place to implement mitigations, the risk is not expected to increase further over the next 12 months and the trend on that basis presents as stable.
-3	L:3 I:3 Score <b>9</b>	L:3 I:3 Score 9	<b>17. Community Investment Programme (CIP)</b>	<b>D. Burns</b>		The Council has secured additional grant funding from the Greater London Authority and the Ministry of Housing Communities and Local Government to support delivery of the programme. CIP's mixed delivery model helps the Council manage the inherent risk of a development programme. With the robust mitigations in place, additional funding secured and the housing market stabilising, this risk is assessed as reduced compared to the last report. The forward outlook presents as stable.
NEW	L:3 I:3 Score <b>9</b>	L:3 I:3 Score 9	<b>18. Special Educational Needs and Disability (SEND) Funding and Provision</b>	<b>T. Aldridge</b>		There is substantial pressure on the SEND system nationally, with London Councils predicting a cumulative £500m deficit in SEND provision by the end of 2026/27. Camden's SEND service is under significant pressure. A programme of actions is being implementing to address these challenges. The forward outlook for the next 12 months is assessed as increasing.
-3	L:3 I:3 Score <b>9</b>	L:2 I:4 Score 8	<b>19. Information Governance – major data protection breach</b>	<b>H. Mohamed / K. Myers</b>		There have been two reportable breaches reported to the Information Commissioner's Office (ICO) since the last report, with no further action taken by the regulator. The risk is assessed as being reduced compared to the last report following the implementation of actions from the 2023 data governance review. The forward outlook is assessed as stable.

Change in score since Nov 2024	Current Score	Target Score	Risk Title	CMT Risk Sponsor	Forward Trend	Comment on risk trend
-	L:3 I:3 Score <b>9</b>	L:3 I:2 Score 6	<b>20. Medium Term Financial Strategy Delivery</b> - Failure to successfully identify and implement savings projects	<b>H. Mohamed / K. Myers / D. Omisore</b>	↔	The Council continues to deliver against the £28m savings programme for 2023/24 to 2025/26 alongside inflationary pressures and high demand for services. The upcoming three-year settlement for local authorities will inform savings targets for the next MTFS period. 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>21. Schools' Sufficiency and Financial Viability</b>	<b>T. Aldridge</b>	↑	The Council continues to respond to changes in demand for school places. A reduction in demand for primary school places is now reflected at secondary school level as well. The number of schools in financial deficit and drawing on reserves have increased since the last report. This impacts both individual school positions as well as the Dedicated Schools Grant (DSG). The forward outlook is assessed as increasing over the next 12 months.
-	L:3 I:3 Score <b>9</b>	L:3 I:3 Score 9	<b>22. Pupil Achievement-Key Stage 4</b>	<b>T. Aldridge</b>	↑	Key Stage 4 preliminary results for 2025 are below the expected standard. The Council continues to implement its Education Strategy to address these concerns. The forward outlook is assessed as increasing over the next 12 months.
-	L:3 I:3 Score <b>9</b>	L:3 I:3 Score 9	<b>23. Fire Safety</b> (private building owners)	<b>G. Marston</b>	↔	The team has made good progress in enforcing building safety regulations in relation to privately owned high rises in Camden. The focus for enforcement is now moving to medium rise buildings which will cover around 11,000 buildings. 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 3	<b>24. Compliance with Consumer Standards</b> (as a landlord)	<b>G. Marston</b>	↔	Camden submitted its second report on performance against Tenant Satisfaction Measures in June 2025 for the period 1 April 2024 to 31st March 2025. A mock inspection against the standards was conducted in Spring 2025 and generated valuable learning on the Council's position. We anticipate the Council will need time to demonstrate full compliance, however with the actions being delivered in response to the mock inspection, the risk trend is assessed as stable over the next 12 months.

Change in score since Nov 2024	Current Score	Target Score	Risk Title	CMT Risk Sponsor	Forward Trend	Comment on risk trend
-	L: 3 I: 3 Score <b>9</b>	L: 2 I: 1 Score 2	<b>25. Complaints in housing repairs</b> - Escalation of cases and referrals to Housing Ombudsman	<b>G. Marston</b>		Between November 2024 and July 2025, the Council put in place significant improvements to address the recommendations made by the Housing Ombudsman (HO). The Council worked closely with the HO on its action plan and this was fully signed off by the HO in July 2025. The risk level remains until new ways of working have fully embedded. The forward trend is assessed as stable.
-	L:3 I:3 Score <b>9</b>	L:2 I:3 Score 6	<b>26. Contract Management and Procurement</b> - Non-compliance with new requirements introduced by the Procurement Act 2023	<b>D. Burns</b>		The Procurement Act 2023 came into effect in February 2025 and incorporates elements of contract management. Additional parts of the Act are still to come into effect and during this transition period there may be increased risk on non-compliance as new requirements on contract managers are being embedded. The forward outlook over the next twelve months is therefore assessed as increasing.
-4	L:2 I:4 Score <b>8</b>	L:2 I:3 Score 6	<b>27. Significant Health and Safety Incident</b> (Occupational)	<b>H. Mohamed / K. Myers</b>		Data indicates there has been an increase in violence and aggression against staff in public facing roles by members of the public and action is being taken to support frontline staff. The risk of the Council not meeting its statutory obligations in relation to health and safety is assessed as reduced compared to last year, with key pieces of work delivered. The forward outlook presents as stable for the next 12 months.
-	L4 I:2 Score <b>8</b>	L:3 I:2 Score 6	<b>28. Housing Delivery</b> - the Council does not meet overall housing targets as set out in the London Plan	<b>D. Burns</b>		Housing delivery in Camden in 2024/25 showed a significant increase in delivery compared to recent years but is still below borough's challenging housing target. The Council has been engaging with the GLA in the development of the next London Plan and a draft revised plan is expected to be published in Spring 2026. The forward trend for the next 12 months is presenting as stable.
-	L:2 I:2 Score <b>4</b>	L:2 I:2 Score 4	<b>29. Serious Fraudulent Activity</b>	<b>K. Myers/ H. Mohamed</b>		The Council continues to implement its anti-fraud and corruption strategy and there is a sound level of investigative activity. The forward outlook remains stable for the next 12 months.



**Appendix 4: Principal risk register** (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

1. Financial resilience and strategy (general funds)			Existing Controls			
<b>Current Score: 20</b> (L:4, I:5)	<b>Target Score: 3</b> (L:3, I:1)	<b>Outlook:</b> Increasing	<div><div>1. Close monitoring of income streams and debt levels to see what impact inflation, service demand and pressures on residents are having on the Council's income and expenditure.</div><div>2. CMT are taking a series of Oversight Panels to better understand and address areas of high financial risk across the Council. Budget monitoring is also being enhanced, with monthly monitoring being implemented for high risk areas and the Chief Executive meeting with Executive Directors to review their recovery plans.</div><div>3. Quarterly reporting of the delivery of the MTFS as part of regular finance budget monitoring.</div><div>4. Monitoring reports to Service, Division and Corporate levels (Senior Management Team, DMT and CMT), with the position being reported to Cabinet twice a year.</div><div>5. 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.</div><div>6. 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.</div><div>7. The Council has enacted a 2.5% vacancy factor to reduce expenditure and to increase financial resilience, as well as enhancing controls around the use of agency staff and recruitment.</div><div>8. The Council has set a balanced budget for 2025/26. Early forecasts are for an overspend of £28m in the GF, however officers are working to reduce this in year and the Council also sets aside corporate resources to help manage pressures.</div><div>9. 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.</div><div>10. Initial work ongoing to consider the Council's budget gap/review approach once the current MTFS concludes at the end of 2025/26</div><div>11. Officers continue to regularly monitor and assess the Council's financial resilience, including through the use of tools such as CIPFA's Financial Resilience Index.</div></div>			
<b>Risk:</b> Significant decline in the Council's financial sustainability and resilience. The Council continues to operate within a highly challenging financial landscape, marked by escalating cost pressures and increasing demand for services. Across the country, many Local Authorities are facing mounting fiscal difficulties. Some have issued or signalled the possibility of issuing Section 114 notices, while approximately 30 have sought 'Exceptional Financial Support' from the government to secure a balanced budget. While the Council remains financially resilient and does not currently anticipate any significant deterioration in its financial position over the medium term, it is operating in an environment of uncertainty pending the outcome of the Fair Funding Review in the Autumn. This adds an additional layer of complexity to long-term financial planning.						
<b>Cause:</b> Significant inflationary pressures across salaries and contract costs. There are significant cost pressures across social care from both inflation and demographic cost drivers. There are also significant demand pressures in Homelessness services. Government funding has not kept pace with the financial pressures the council has been 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.						
<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 any budget gaps						
<b>Risk Update:</b> The government has begun to move away from the pattern of single year financial settlements, with a three-year settlement expected from 2026/27 to 2028/29. It will deliver these settlements on the basis of revised funding distribution methodologies through the Fair Funding Review, following a consultation which the Council has fed into. There is a high risk of reduced funding for Inner London Boroughs, including Camden, though no decisions have yet been made. The government's budget statement in November and the provisional settlement in December will likely provide greater certainty. In February 2025, the Council agreed a balanced budget for 2025/26, including an assessment of how far the Council's reserve levels are adequate over the medium term. The February 2025 report to Cabinet and Full Council also included a review of the Council's financial resilience and the risks and challenges facing the Council's continued financial resilience. However, the Council faces acute pressures against these budgets, with substantial overspends being forecast for 5 consecutive quarters; overspends are predominantly driven by children's social care and homelessness but are an issue across all directorates. Officers are currently working to address the overspends and reduce them in year. The return to multi-year settlements in this parliament may ultimately give more certainty to the Council's Medium Term financial forecasts. The MTFS report to Cabinet in July 2025 considered the Council's medium term financial position and provided substantial commentary on the £22.8m overspend incurred in 2024/25, along with mitigations. Despite the agreed MTFS there remains a high level of uncertainty and challenge to our financial resilience.						
Actions		Action owner	Status	Due Date	Risk sponsor	
1. Continue to monitor budgets and report to DMT/CMT to ensure timely action is taken to address financial pressures.		Daniel Omisore	1. In progress	1. Ongoing	D. Omisore / K. Myers/ H. Mohamed	
2. 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			2. In progress	2. Ongoing		

2. Housing Revenue Account (HRA) Financial Resilience			Existing Controls		
<b>Current Score: 20</b> (L:4, I:5)	<b>Target Score: 3</b> (L:2, I:1)	<b>Outlook:</b> Increasing	<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. Quarterly meetings between the Chief Executive, the Executive Director for Homes &amp; Communities and the Director of Finance to agree and monitor plans to reduce overspends begin in Q3 2025/26.</li> <li>4. Regular monitoring by Executive Director Corporate Services of the council's immediate and long-term income streams and debt levels.</li> <li>5. The Asset Management Strategy to keep capital expenditure on existing stock within an agreed limit</li> <li>6. Review of expiring contracts and seeking efficiencies wherever possible.</li> <li>7. Shift how the CIP is funded to reduce the need for borrowing</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. An internal board to closely monitor its compliance with the new social housing regulatory regime.</li> </ol>		
<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> In recent years HRA revenue and capital budgets have had to absorb a range of new costs relating to high inflation, increased interest rates, fire &amp; building safety (including the Chalcots recladding project), damp &amp; mould, disrepair claims and increased regulation. On the income side, it was also impacted by enforced annual rent reductions between 2016 and 2020 and by increased arrears due to the cost-of-living crisis and the roll-out of Universal Credit.</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 2025, another £0.6m of savings were added to the existing £11.41m of savings agreed since January 2023 as part of the HRA Medium Term Financial Strategy (MTFS) for the period 2023/24 to 2025/26. The HRA budget in 2025/26 includes £5m contribution to reserves to build up financial resilience. HRA borrowing and debt profiles are regularly monitored and managed to ensure they remain affordable. In January 2025, the Cabinet agreed a Housing Asset Management Strategy which will invest an additional c.£350m in the maintenance of housing stock up in the period 2025-2030. The strategy prioritises work which relates to regulatory requirements such as fire and building safety and preventing disrepair and raises the shortfall of funds needed by disposing of poorly performing properties.</p> <p>Major risks at Q1 2025/26 were overspends on repairs driven principally by disrepair cases, on interest payments driven by increases in interest rates and on contributions to the Major Repairs Reserve. While some shorter-term pressures such as arrears, energy prices, external interest rates and cost inflation are past their peak, they remain higher than in the past. There are new budget pressures emerging, principally relating to the introduction of Awaab's Law. On the plus side, the government has agreed a long-term rent policy of CPI+1% and has recently consulted on a rent convergence policy, the outcome of which should appear in the 2025 Autumn Statement. However, the Council's financial forecasting shows that the additional rental income is unlikely to be sufficient to cover the pressures and further savings will be needed for the 2026/27 financial year. Despite the Housing Asset Management Strategy, the Council's longer-term ability to maintain its stock remains a risk. The Council still expects to be inspected by the Regulator of Social Housing before the end of 2025/26, and a poor score could reduce access to capital grants for regeneration schemes.</p>					
Actions		Action owner	Status	Due Date	Risk sponsor
<ol style="list-style-type: none"> <li>1. Continue to monitor budgets and report to DMT/CMT to ensure timely action is taken to address financial pressures.</li> <li>2. Implement the savings programme</li> <li>3. Deliver the asset management strategy</li> </ol>		<ol style="list-style-type: none"> <li>1. Michael Webb, Jason Blackhurst</li> <li>2. Gavin Haynes, Glendine Shepherd, Neil Vokes</li> <li>3. Gavin Haynes, Sinéad Burke</li> </ol>	<ol style="list-style-type: none"> <li>1. In progress</li> <li>2. In progress</li> <li>3. In progress</li> </ol>	<ol style="list-style-type: none"> <li>1. Ongoing</li> <li>2. Ongoing</li> <li>3. Ongoing</li> </ol>	H. Mohamed / K. Myers G Marston



3. Increasing Homelessness			Existing Controls			
<b>Current Score: 20</b> (L: 4, I: 5)	<b>Target Score: 4</b> (L: 2, I: 2)	<b>Outlook:</b> Increasing	<ol style="list-style-type: none"> <li>1. Routes Off the Street Service - Camden has enhanced its street outreach team by adding further capacity and creating some targeted roles to focus on encampments, women and hot spots.</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. To ensure we only place households into TA where we have a statutory duty, every placement is now scrutinised and signed off by senior management.</li> <li>6. Reports of all TA placements are circulated and shared with the Director of Housing on a weekly basis.</li> <li>7. Homelessness application backlog eliminated to ensure we have an opportunity to prevent homelessness in more cases.</li> <li>8. Process improvement work has taken place to strengthen our work to prevent homelessness, including a design sprint and prevention pilot interventions started September 2025</li> <li>9. The TA placement process has been amended to ensure Housing Benefit is applied at the point of placement, which will ensure maximum rental collection.</li> <li>10. Responsibility for TA rent collection has been transferred to the council's central rent collection team, this will deliver improvement in collection rates.</li> <li>11. Delivering new accommodation options for people who have slept rough such as 30 new Housing First tenancies, through Council acquisition programme and in partnership with Notting Hill Genesis.</li> <li>12. Continue to identify our most costly TA provision and re-negotiate rates.</li> </ol>			
<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> Pressure on the Council's homelessness service has continued to increase. Between April and June 2025, 291 people were seen rough sleeping in Camden. This represents a 6% increase compared to the same period last year. Q1 2025 saw a slight decrease in statutory homelessness presentations compared with the same quarter last year with 1086 applications in Q1 2024/25 compared to 1043 in Q1 2025/26. However, already in Q2, from July and August 2025 data, we are seeing more presentations than the same months in 2024. All London authorities are seeing large increases in spend on temporary accommodation. Camden has seen a significant increase in households in temporary accommodation - from 498 in 2019 to almost 1000 in August 2025. Temporary accommodation continues to be a financial challenge for the Council, with £15.4m overspend forecasted for 2025/26 unless robust action is taken. The council is working towards finding new, more financially stable options to meet this statutory duty.</p> <p>Following on from the success in securing 133 properties through Temporary Accommodation Purchase Programme (TAPP) 1 and 2, we also secured funding from MHCLG for a third phase, TAPP3, which delivered an extra 57 units of TA in 2025. As an alternative to procuring a supply of TA through third party providers, we are utilising opportunities to use void properties on estates earmarked for regeneration. On the West Kentish Town we are currently using 40 properties as TA, let on a non-secure licence basis. The service has successfully ended the use of expensive commercial hotels having moved approx. 180 households to alternative accommodation, which delivered an annualised saving of £3.2m. To increase our in-house provision of self-contained TA units, Chester and Camden Road hostels are currently in construction and due to open in Autumn 2026, providing an extra 86 family units.</p>						
Actions			Action owner	Status	Due Date	Risk sponsor
<ol style="list-style-type: none"> <li>1. Complete the housing restructure to align services to better procure and manage temporary accommodation and increase our frontline prevention resources.</li> <li>2. Implement recommendations from the Peer Review of our Private Rented Procurement service which will increase our placements into the private rented sector.</li> <li>3. Review and standardise the rent charges across all forms of TA which should be set at the maximum level permitted, e.g. 90% 2011 LHA.</li> <li>4. Implement tenancy sustainment roles to prevent more households at risk losing their homes</li> <li>5. Implement our homelessness prevention pilots; debt and money advice interventions and quick private rented sector (PRS) offers at the front door</li> </ol>			Glendine Shepherd	<ol style="list-style-type: none"> <li>1. In progress</li> <li>2. In progress</li> <li>3. In progress</li> <li>4. In progress</li> <li>5. In progress</li> </ol>	<ol style="list-style-type: none"> <li>1. Jan 2026</li> <li>2. Dec 2025</li> <li>3. Jan 2026</li> <li>4. Dec 2025</li> <li>5. Oct 2025</li> </ol>	G. Marston

4. Financial Resilience of Residents			Existing Controls		
<b>Current Score: 16</b> (L:4, I:4)	<b>Target Score: 9</b> (L:3, I:3)	<b>Outlook:</b> Stable	<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</li> <li>3. Income maximisation, budgeting, debt and welfare advice is available in the community, both through the 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>		
<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 develop a comprehensive support programme to assist residents impacted by cost-of-living pressures. The Household Support Fund (HSF) and Cost of Living (CoL) fund continue to provide cash grant support to residents facing hardship in 2025/26. Camden's HSF allocation was reduced by 12%, to £3m, for this financial year. However, Camden continues to invest £2.25m in the CoL meaning the total hardship grant programme to residents remains substantial. From 2026/27, the HSF will be replaced by the Government's new Crisis and Resilience Fund. A three-year settlement is expected which will enable greater stability for local support, although details will not be available until the end of December.</p> <p>There is a continued focus on proactive outreach to increase awareness of the programme and ensure widespread uptake of available grants by residents facing hardship. The administration of these grants now sits within the newly formed Camden Money Advice service, which reflects Camden's increasing focus on strengthening the longer-term financial resilience of residents. Residents receiving grants also now receive opportunities for income maximisation through debt and welfare right advice. Increased use of data and insight is also enabling the delivery of preventative outreach campaigns offering support to residents who may be at risk of future hardship. The Team supports around 2,600 residents per year. Camden also provides support through Council Tax Support Scheme. Around 16,000 households (including pensioners) in Camden currently receive 100% support and do not pay any council tax. The scheme is estimated to cost £32.6m in 2025/26.</p> <p>It is important to note that whilst inflation has come down, costs have not reduced and many at risk households rely on benefits or wages which have not kept pace with inflation. There are also signs of the job market cooling which may lead to a rise in unemployment. Therefore, while the risk outlook remains stable, the risk to residents remains high.</p>					
Actions		Action owner	Status	Due Date	Risk sponsor
<ol style="list-style-type: none"> <li>1. Deliver response programme to support residents, including the household support fund and the cost-of-living crisis fund</li> <li>2. Prepare for the new Crisis and Resilience Fund</li> <li>3. Continue to develop proactive approaches to support longer-term financial resilience of residents.</li> </ol>		Amy Kimbangi	<ol style="list-style-type: none"> <li>1. In progress</li> <li>2. Planned</li> <li>3. In progress</li> </ol>	<ol style="list-style-type: none"> <li>1. Ongoing</li> <li>2. April 2026</li> <li>3. Ongoing</li> </ol>	H. Mohamed / K. Myers

5. Improving Camden's climate resilience and enabling a zero carbon Camden			Existing Controls		
<b>Current Score: 16</b> (L:4, I:4)	<b>Target Score: 6</b> (L:3, I:2)	<b>Outlook:</b> Increasing	<ol style="list-style-type: none"> <li>1. 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>2. The Climate Adaptation and Resilience Plan is reviewed annually as part of the Climate Action Plan review</li> <li>3. A new Climate Action Plan 2026-30 has been produced and will be considered by Cabinet in December 2025</li> <li>4. The council's Flood Risk Management Strategy runs to 2027 and is reviewed annually</li> <li>5. 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 and a new Citizen panel is being considered for the next Climate Action Plan 2026-2030</li> <li>6. 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>7. C&amp;E Scrutiny is invited to review the Climate programme annually</li> <li>8. Adverse Weather Plan – warnings are issued to all relevant Council services before extreme/adverse weather events with service level action plans then implemented.</li> </ol>		
<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> The most recent report of the Government's Climate Change Committee highlights that national policy remains inadequate to address increasing climate related risks. Key infrastructure vulnerable to extreme weather events in Camden is also owned and managed by 3<sup>rd</sup> parties such as Thames Water and TfL. Net zero remains challenging given that the Council only has control or influence over 1/3 of borough emissions and the estimated £10bn cost over business-as-usual investment far exceeds Council budgets.</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. 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> 2025 will be the hottest summer on record, with four heat waves declared. Nine of the last 10 summers (2016-2025) have brought temperatures above the long-term norm. 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 heat and flooding, however since the last update a new Adverse Weather Plan has been developed by the corporate resilience team with supporting service guidance about how to prepare. The Council's new Climate Action Plan 2026-2030 was also published for consultation in September and will be considered by Cabinet in December 2025. The new CAP has an enhanced focus on climate resilience and risk. The increasing occurrences of extreme heat are becoming a key issue, with vulnerable people and infrastructure most at risk. Projects to identify areas prone to overheating and provide recommendations for cooling measures, such as the Holborn Liveable Neighbourhood Heat Risk Study, as well as linking in with the GLA's Cool Spaces Programme to expand our network of public cool spaces are helping to minimise the risks associated with overheating and prepare people. Flood risk remains a multi-agency risk with the capacity of Thames Water's sewer network remaining critical. The Council is preparing a new Green Infrastructure Strategy to prioritise delivery of sustainable drainage systems alongside transport projects and new projects are underway to improve flood related infrastructure in key flood risk zones including South Hampstead and South End Green.</p>					
Actions		Action owner	Status	Due Date	Risk sponsor
<ol style="list-style-type: none"> <li>1. Deliver the current Climate Action Plan and Climate Adaptation and Resilience Plan</li> <li>2. Continue to retrofit Council buildings to cut greenhouse gas emissions and improve the council's energy security</li> <li>3. Flood Risk Management Strategy and actions within</li> <li>4. Adopt the new Climate Action Plan 2026-2030 with enhanced focus on climate resilience</li> </ol>		<ol style="list-style-type: none"> <li>1. Richard Bradbury</li> <li>2. Gavin Haynes</li> <li>3. Richard Bradbury</li> <li>4. Richard Bradbury</li> </ol>	<ol style="list-style-type: none"> <li>1. In progress</li> <li>2. In progress</li> <li>3. In progress</li> <li>4. In progress</li> </ol>	<ol style="list-style-type: none"> <li>1. December 2025</li> <li>2. Ongoing</li> <li>3. 2027</li> <li>4. December 2025</li> </ol>	D. Burns

6. High Speed 2 and Euston			Existing Controls		
<b>Current Score: 16 (L:4, I:4)</b> <b>Target Score: 9 (L:3, I:3)</b> <b>Outlook: Stable</b>			<ol style="list-style-type: none"> <li>1. Cllr Olszewsky 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 developing a housing compact with residents through participatory events engaging residents' views on future housing development in the area.</li> <li>7. Assurances are monitored and reviewed regularly in conjunction with HS2 and the community where the community is able to comment on progress.</li> </ol>		
<p>Risk: The HS2 and Euston project does not deliver the desired community benefits/mitigations and place improvements to the time, cost and quality needed. Risk that requirement for development to pay towards the station makes it harder to deliver community benefits. There is a risk of over development and lack of planning control introduced by a development cooperation at Euston in order to pay for the station and infrastructure at Euston.</p> <p>Cause: Government approach to delivery Euston station, relying on private finance and the creation of some form of development zone. This was the previous Government's response to spiralling costs of design and construction and Council's limited ability to influence.</p> <p>Consequence: Reduced community benefit/place improvements. Depending on the detail of the approach taken by the Government to financing, Governments expectation of the use of private financing for the station and the approach to housing delivery there could be reduced economic and social benefits, loss of faith in the Council as the body representing the communities' interests.</p> <p>Risk Update: The previous Government cancelled the HS2 Manchester Leg and announced a new development zone/corporation and a 6-platform station in October 2023. This resulted in a redesign process being commenced for a smaller station and the planned development above the station to reduce complexity and costs. Work is underway to consider potential station concepts in a coordinated way, led by The Euston Partnership. Whilst HS2 construction works were paused in 2023, officers worked with the community to identify opportunities for 'meanwhile use'. Construction have now been un-paused and enabling work for HS2 has resumed where possible which means some of the meanwhile use areas have been reclaimed. Camden is working with Old Diorama Arts Centre and voluntary sector organisations in the area to research the communities' housing priorities. An independent facilitator will work with community members to develop a Housing Compact for Euston to feed into the work with the Ministry of Housing, Communities and Local Government (MHCLG) to look at housing delivery potential. We will also continue to work to ensure that the Council is able to input Camden priorities into the decision-making process for station design through established boards and lobbying where necessary. The forward outlook has stabilised compared to last year, with the government's commitment to bring HS2 to Euston station and the Council's proactive approach to lobbying for a Locally Led Development Corporation. The Council also continues to monitor delivery of the Assurances from HS2 to Camden to mitigate the impact of the construction of HS2 in Camden.</p>					
Action	Action owner	Status	Due Date	Risk sponsor	
<ol style="list-style-type: none"> <li>1. Progress independent examination of the Euston Area Plan</li> <li>2. Continued lobbying for Camden to have a leadership rule/ be the oversight authority in any new Development Corporation/ Delivery structure</li> <li>3. 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</li> </ol>	Mary-Ann Lewis	<ol style="list-style-type: none"> <li>1. In progress</li> <li>2. In progress</li> <li>3. In progress</li> </ol>	<ol style="list-style-type: none"> <li>1. Autumn 2026</li> <li>2. Ongoing</li> <li>3. Ongoing</li> </ol>	D. Burns	

7. Cyber and Data Security			Existing Controls		
Current Score: 15 (L:3, I:5)	Target Score: 9 (L:3, I:3)	Outlook: Increasing	<div><div>1. Data, digital and technology policy and controls in place, such as device encryption, email security, role-based access controls, web access firewall (C-WAF), Endpoint Detection &amp; Response (EDR).</div><div>2. Corporate Induction training regarding computer usage policy and information security policies.</div><div>3. Quarterly party penetration testing to test and improve our data, digital, and technology security.</div><div>4. Compliance and statutory standards projects</div><div>5. Cross-council coordination to remove users from systems when they leave.</div><div>6. Robust standards for authentication and integrated security monitoring.</div><div>7. Business Continuity and Disaster Recovery Plans</div><div>8. Six-monthly desktop exercises testing the Cyber Incident Response Plan</div><div>9. Monthly system updates and reporting.</div><div>10. Digital Services continue to be involved in the procurement process to improve cyber security. Robust security assessments provide assurance on all technology suppliers.</div><div>11. Internal Communications and ongoing awareness training programmes for all staff focus on behavioural change.</div><div>12. Contract in place with cyber incident response partner.</div></div>		
<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></p> <p>The overall cyber threat landscape remains complex and ever-changing, with increasingly sophisticated tools and attack methods employed against organisations. The Customer, Technology &amp; Data Services (CTDS) division has continued to deliver critical work as part of the Council's Cyber Security Programme, including maintaining higher-risk legacy systems. We have successfully recertified as compliant with the Public Service Network (PSN) standard and Payment Card Industry Data Security Standard (PCI-DSS), and a continued focus on security remediation with targeted activity based on severity, leveraging our vulnerability management platform. Our programme to remediate security vulnerabilities in all 48 Camden schools taking the Schools IT Support Service (SitSS) SLA is now advanced. This work is being led by a Cyber Security Analyst dedicated to SitSS and follows detailed vulnerability scanning and risk assessments completed early in 2025. CTDS is delivering an extensive set of cyber awareness training to secondary school staff and students as part of the annual October Cyber Awareness Month. CTDS staff continue to participate in externally facilitated desktop exercises to test the Council's approach to a range of service-impacting incidents, and we are collaborating with the Emergency Planning service to further integrate and test this with the Councils incident management processes. We are in the process of re-procuring the cyber incident response contract, which will be extended to cover schools, bringing the insurance offered by the Council in line with the DfE Risk Protection Arrangement (RPA). CTDS 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. Finally, we are now planning phase two of our alignment with the new Cyber Assurance Framework (CAF) published by the National Cyber Security Centre (NCSC).</p>					
Actions		Action owner	Status	Due Date	Risk owner
1. Deliver ongoing staff cyber training and awareness-raising.		1. A Snape	1. In progress	1. Ongoing	H. Mohamed / K. Myers
2. Deliver the applications and infrastructure rationalisation and other priority programmes to eliminate or upgrade remaining legacy systems.		2. T Khan, A Snape and N Abraham	2. In progress 3. In progress 4. In progress	2. Ongoing 3. Ongoing 4. Mar 2026	
3. Deliver ongoing Information Security Programme aligned to the Cyber Assurance Framework ensuring continuing risk-based approach to cyber security remediation.		3. A Snape			
4. Deliver the Schools (SitSS) Security Remediation Programme		4. A Snape			



8. Safeguarding Adults			Existing Controls		
<b>Current Score: 12</b> (L:3, I:4)	<b>Target Score: 8</b> (L:2, I:4)	<b>Outlook:</b> Increasing	<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 quality of services, financial pressures and demand and activity is retained through a newly established ASC Oversight Board, chaired by the Executive Director of Adults and Health</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, ensuring the safety of discharges from hospital settings</li> <li>5. Staff resilience is monitored through staff supervision and visible leadership in offices</li> <li>6. The Safeguarding Adults Board continues to provide strategic direction and accountability for ensuring that statutory and non-statutory partners are aware of and fulfilling their safeguarding duties and responsibilities</li> <li>7. We are signed up to the Ethical Care Charter and are a London Living Wage employer</li> <li>8. Contracts with external providers are awarded on a long-term basis, with a focus on building strategic partnerships to improve quality and sustainability</li> <li>9. 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>10. 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>11. We have in place long term care and reablement providers which are geographically aligned with GP practices and our neighbourhood teams.</li> <li>12. 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> <li>13. Social Workers from Mental Health services have recently returned to the Council, having been seconded to the Mental Health Trust for many years. This provides closer monitoring and assurance of delivery of our statutory duties, demands on the service and the quality of our work with residents.</li> </ol>		
<p><b>Risk:</b> Continued pressures and year on year increased demand for adult social care services could mean that we are unable to respond to the needs of residents in a timely way thus increasing the risk of otherwise preventable harm to individuals in need of care and support</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 long waits for services, abuse and/or ineffective responses to safeguarding concerns, adverse publicity, complaints from residents and ombudsman.</p> <p><b>Risk Update:</b> Demand for services remain high with some residents presenting with more complex needs. Financial pressures and vacancies in teams means that people continue to wait for our interventions and managing volumes of work continues to be challenging. 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, with four Safeguarding Adults Reviews published thus far in 2025. 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. A newly established SAR multi agency implementation group will be responsible for reviewing recommendations and learning from reviews and ensuring that all agencies address the recommendations. Community equipment provision has presented significant issues within the year, with the liquidation of NRS (provider for 21 London boroughs including Camden) and the need to procure contingency arrangements from August and a new provider from September. The new service will take a number of months to mobilise fully, so urgent and critical provision will be prioritised.</p> <p>The ASC Workforce Strategy continues to mitigate recruitment and retention challenges across our own and commissioned services with focus on recruitment to the hardest to fill roles such as Social Workers and Occupational Therapists. A recruitment event in June 2025 has resulted in the onboarding of approx. 20 newly qualified and experienced social workers. In February 2025 the outcome of the CQC inspection of Adult Social Care was announced with Camden awarded a rating of Outstanding. This new inspection regime seeks assurance from Councils about how well they exercise their statutory duties under the Care Act 2014. Whilst this rating was welcomed and celebrated, Adult Social Care recognises that there are continued pressures on services and our workforce, and the outcome of the CQC inspection recognises that there is strong leadership, oversight and partnership arrangements in place to address these challenges. Given this assurance, the risk score is assessed as reduced compared to the last report. The current financial, demand and workforce context in which we operate continues to be very challenging and the forward outlook is therefore assessed as increasing.</p>					
Action		Action owner	Status	Due Date	Risk sponsor
Deliver Adult Social Care Workforce Strategy		Avril Mayhew	In progress	Ongoing	J. McGregor

9. Pressures within the Health System			Existing Controls		
<b>Current Score: 12</b> (L: 3, I: 4)	<b>Target Score: 4</b> (L: 2, I: 2)	<b>Outlook:</b> Stable	<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. Meetings between local authority public health directors across the new ICS footprint.</li> <li>4. Weekly briefings at Adults and Health DMT on changes to NHS and likely impacts to local services – action plan to mitigate</li> <li>5. 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>6. 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>7. 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>8. 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>9. We have an established Health Protection Group which has supported residential and care settings with good practice infection prevention and control.</li> </ol>		
<p><b>Risk:</b> Continuation of system pressures within health services arising from the threat of industrial action, changes to funding, increasing demand, elective care backlog, changing health service footprint 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> A range of significant changes and plans have been announced during 2025 which include a 50% reduction to Integrated Care Board (ICB) operating budgets, 2% further operating efficiency target for the NHS as well as further changes to local health footprint through the merger of North Central and North West London Integrated Care Systems (ICS). This merger will increase the local authority footprint that Camden is part of from five to thirteen local authorities which could result in the dilution of localised services. The Council continue to engage fully in the development of the new 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 ensure that we are able to continue to deliver high quality outcomes for Camden residents and that our approach to resourcing and investment is aligned and effective. We continue to commission a number of preventive health and wellbeing services within primary care to support health and wellbeing.</p> <p>Risk levels remain high due to the significant demand on healthcare services, financial pressures and the level of change needed to achieve full integration between health and social care.</p>					
Action		Action owner	Status	Due Date	Risk sponsor
Continued work the delivery of the ambitions within the Population Health and Integrated Care Strategy		K. Watters	In progress	Ongoing	J. McGregor K. Watters

10. Failure to Tackle Social Inequalities			Existing Controls				
<b>Current Score: 12</b> (L:3, I:4) <b>Target Score: 9</b> (L:3, I:3) <b>Outlook:</b> Stable							
<p><b>Risk:</b> Failure to challenge and address social inequalities in Camden</p> <p><b>Cause:</b> Poor prioritisation, lack of clear governance, and/or detailed project/programme management, ineffective engagement/consultation with affected groups/communities</p> <p><b>Consequence:</b> Loss of community confidence in the Council. Poor outcomes for residents, detrimental impact on community cohesion</p> <p><b>Risk Update:</b></p> <p>The Equalities team continues to focus on embedding an integrated approach across the council to equality and intersectionality. A quality assurance lead has been recruited to support the quality and consistency of equality impact assessment.</p> <p>Central Government has launched a commission which will identify recommendations on how to improve services for people with disabilities. The Council is working towards becoming a more accessible borough for all and looking to create further vehicles for this change.</p> <p>Race and disability equality legislation is under review by the government and there may be changes coming on requirements in those areas. The council is awaiting the final guidance on the Supreme Court's ruling on the legal definitions surrounding sex and gender which will have an impact on many LGBTQ+ residents and staff.</p> <p>The council will revise its Equality policy objectives in 2025 which will inform the development of a council-wide equalities framework. The team is also working with finance colleagues on the upcoming Fair Funding 2.0 and its impact on social inequalities. Persistent social inequalities can manifest as lack of trust and resentment between different groups and foster feelings of alienation. Addressing social inequalities are therefore a cornerstone in strong community cohesion in Camden.</p>			<ol style="list-style-type: none"><li>1. Director of Equalities and Community Strength provides strategic leadership to the Council's efforts to tackle inequalities.</li><li>2. Equality Impact Assessments – Quality Assurance lead in place in Nov 2025</li><li>3. Disability Oversight Panel – The service is trialling innovative ideas in the disability space, working in co-design with our disabled communities.</li><li>4. Expanded remit for the Equalities Team</li><li>5. The Equality Act 2010 requires councils (and other public sector organisations) to set at least one equality objective every four years.</li><li>6. Diversity in the public realm strategy created with implementation plan being programme managed by the Equalities service with deliverables throughout the council.</li><li>7. The Camden Equity Network in place to share best practice across the Borough around equalities with our partner institutions.</li></ol>				
Action			Action owner	Status	Due Date	Risk sponsor	
<ol style="list-style-type: none"><li>1. Building community confidence in close partnership with community organisations and partners</li><li>2. Development of a Council-wide equality framework – in line with equalities objectives and policy</li><li>3. Review and update the Council's Equalities policy</li></ol>			Mathurini Visakan	<ol style="list-style-type: none"><li>1. In Progress</li><li>2. In Progress</li><li>3. Planned</li></ol>	<ol style="list-style-type: none"><li>1. Ongoing</li><li>2. TBC</li><li>3. December 2025</li></ol>	H. Mohamed / K. Myers	



11. Workforce Diversity and Inclusion			Existing Controls			
<b>Current Score: 12</b> (L:3, I:4) <b>Target Score: 4</b> (L:2, I:2) <b>Outlook:</b> Stable			<div>1. Race Equality Action plan continues to be implemented.</div> <div>2. Inclusive recruitment processes and practices in place: diverse recruitment panels policy, no all-white candidate shortlists for level 5 and above, inclusive language in job descriptions and adverts, anonymised recruitment for all roles, inclusive recruitment training for hiring managers and recruitment champions.</div> <div>3. Discrimination support hub (formerly Reporting discrimination hub) continues to provide support to staff and share insights about issues and experiences of discrimination and racism in the workplace.</div> <div>4. 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 and Parent group.</div> <div>5. 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.</div> <div>6. The Wellbeing passport continues to be well received as is the introduction of Disability Leave.</div> <div>7. Carers' network continues to meet, and we continue to run sessions with partners to support our staff who have caring responsibilities.</div> <div>8. Diversity data campaign – from our senior leadership members to all staff, encouraging them to update their diversity data</div> <div>9. Gender, ethnicity and disability pay gap analysis undertaken since 2015. Progress towards closing any gaps particularly with regard to ethnicity.</div> <div>10. Publishing a gender pension pay gap report</div>			
<b>Risk:</b> Failure to become a more inclusive and diverse organisation in an inclusive and diverse community. External events (geopolitical situation) fostering greater division in the workplace.						
<b>Cause:</b> Failure to attract a diverse workforce, failure to provide equality of opportunity to support progression, failure to promote and support inclusion.						
<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.						
<b>Risk Update:</b> In November 2024, we launched a new Employee Experience Survey. 2,135 members of staff completed it, which is 44% of the organisation and 50% more than in 2023. The results show the progress the Council is making: <ul style="list-style-type: none"><li>86% of staff feel they belong in our organisation, 91% feel treated fairly and with respect</li><li>89% feel we're making progress to become an anti-racist organisation.</li></ul>						
Based on the learning from the survey, the Council has identified key areas where it will: champion disability inclusion, encourage conversations about mental health, continue to develop the pay and benefit offer, open up conversations about prejudice and discrimination, strengthen support for career progression, transfer good practice across the organisation and beyond, and enable social mobility and fair access to opportunities. The Council's employee profile 2023-2024 showed that 56% of workforce is female, 43.7% of employees are from Black, Asian and Other Ethnic backgrounds (1.7% increase from the previous year). The proportion of White employees decreased at Levels 5-7 from 64.5% to 59.8%.						
Actions			Action owner	Status	Due Date	Risk sponsor
<div>1. Continue to progress the Race Equality Action Plan</div> <div>2. Develop our approach to progression</div> <div>3. Staff network/inclusion groups collaboration and one voice</div> <div>4. Disability inclusion</div> <div>5. Inclusive leadership – focus on 'managers'</div> <div>6. Wellbeing and Belonging</div> <div>7. Listening and evidence (Employee Experience Survey, Diversity Data)</div>			Joanna Brown	<div>1. In progress</div> <div>2. In progress</div> <div>3. In progress</div> <div>4. In progress</div> <div>5. In progress</div> <div>6. In progress</div> <div>7. In progress</div>	<div>1. Ongoing</div> <div>2. Ongoing</div> <div>3. Ongoing</div> <div>4. Ongoing</div> <div>5. Ongoing</div> <div>6. Ongoing</div> <div>7. Autumn 2026</div>	K. Myers / H. Mohamed

12. Recruitment and Retention			Existing Controls			
<b>Current Score: 12</b> (L:4, I:3)	<b>Target Score: 4</b> (L:2, I:2)	<b>Outlook:</b> Stable	<ol style="list-style-type: none"> <li>Internal recruitment first encouraged to support development opportunities for existing staff.</li> <li>Talent attraction continues to increasingly use social media platforms where we can better showcase our employer brand, culture, and employee proposition.</li> <li>Continuous development of recruitment and retention strategy and talent acquisition processes</li> <li>Continuing with our review of the pay system to enable flexibility with confidence that it will be used equitably.</li> <li>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>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>Exit interviews are being encouraged through a questionnaire sent to all leavers.</li> <li>Continue to seek opportunities for Apprenticeships across the organisation</li> <li>Camden Talent Pool targeting entry level roles to local people</li> <li>Targeted recruitment and retention support for critical groups such as social workers</li> <li>Career development workshops are available and feedback from staff that have attended is positive.</li> <li>Inclusive recruitment initiatives implemented with ongoing review to support diversity including</li> <li>Camden continues to get the most its 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> <li>The Safe Staff Team has streamlined DBS and visa processes by moving from paper to online, reducing turnaround times.</li> </ol>			
<p><b>Risk:</b> Failure to recruit and retain the skilled people we need to deliver our services, particularly in specialist roles.</p> <p><b>Cause:</b> The demand for high quality staff, particularly in specialist roles outweighs supply.</p> <p><b>Consequence:</b> Council services will be under resourced and service delivery will be sub-optimal, reliance on expensive agency staff</p> <p><b>Risk Update:</b> Camden continues to operate in a challenging labour market shaped by national economic conditions and in particular specialist and hard-to-fill roles remaining the biggest challenge. Skills shortages persist, particularly in technical, professional, and care roles, where private sector employers can often offer more competitive packages. To respond, Camden will continue benchmarking pay, offering targeted supplements, and strengthening non-pay benefits to deliver a total reward package that reflects staff contribution and supports financial wellbeing. Camden's Reward Strategy continues to evolve to meet the challenges of a competitive labour market. Investments in fair pay, expanded benefits, cultural transformation, enhanced well-being support, and stronger development pathways are strengthening Camden's position as an inclusive, flexible, and progressive employer. These measures not only improve recruitment and retention but also ensure staff feel valued, supported, and able to deliver for Camden's residents. Recruitment activity continues to be high in some areas, and turnover across the Council remain at approximately 9%. Recruitment controls have been introduced to ensure financial controls are in place for all agency and direct recruitment activity. This includes Executive Director and Director of Finance approval for all resourcing activity. This has resulted in a reduction in agency resourcing whilst also facilitating a more stable resourcing model as well as financial savings. Camden is also exploring a London Councils job board with Jobs Go Public to improve visibility of careers in local government and hard-to-fill roles. The Council has introduced a 12-month trial of the Experian online onboarding portal to speed up verification, referencing and reduce time to hire. A retendering exercise for the agency contract has been completed and a recommendation has been made to re-award the contract to Matrix.</p>						
Actions			Action owner	Status	Due Date	Risk sponsor
<ol style="list-style-type: none"> <li>Talent acquisition review work to continue – including our EVP (employee value proposition) and social media attraction</li> <li>Review of Inclusive recruitment training and delivery</li> <li>Ongoing monitoring of recruitment and turnover</li> <li>Progress with review of the pay scheme.</li> <li>London Councils jobs board launch</li> </ol>			Joanna Brown	<ol style="list-style-type: none"> <li>In progress</li> <li>April 2026</li> <li>Ongoing</li> <li>April 2026</li> <li>April 2026</li> </ol>	<ol style="list-style-type: none"> <li>Ongoing</li> <li>April 2026</li> <li>Ongoing</li> <li>April 2026</li> <li>April 2026</li> </ol>	K Myers and H Mohamed

13. Breakdown in Community Cohesion			Existing Controls			
<b>Current Score: 12</b> (L:4, I:3)	<b>Target Score: 9</b> (L:3, I:3)	<b>Outlook:</b> Increasing	<p>13. Reporting to the Community Safety Partnership Board and the Camden Safeguarding Adults Partnership Board regarding Prevent related activity.</p> <p>14. Analysis of borough-wide Hate Crime data is shared with the Camden Community Safety Partnership Board on a regular basis to ensure oversight.</p> <p>15. Embedding the weekly Community Cohesion Tension Monitoring Group meetings and evaluating their impact regarding the mitigation of cohesion-related risks, supported by the Risk Tracker which monitors international, national, and local risks that may impact cohesion locally.</p> <p>16. Maintaining contact through our network of faith leaders and voluntary sector organisations to understand the situation within our community.</p> <p>17. Further support for the Camden Faith leader's forum which enables engagement with faith groups on key community issues, including tensions and hate crime.</p> <p>18. Quarterly Prevent Steering Group meetings in line with the relevant Home Office guidance - order to evaluate risks relating to radicalisation and extremist ideology.</p> <p>19. Continuing the bi-monthly Hate Crime dip-sampling sessions being delivered in partnership with the Metropolitan Police Borough Command Unit with key Voluntary Sector organisations.</p> <p>20. Annual exercise through the Borough Resilience Forum on Council/partner response to a major incident (e.g. terrorist attack).</p> <p>21. Quarterly meetings of the Camden Resilience Advisory Group (internal) chaired by the Executive Director Supporting Communities and facilitated by the Corporate Resilience Team.</p> <p>22. 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'.</p>			
<p><b>Risk:</b> Breakdown in community cohesion leading to community unrest</p> <p><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.</p> <p><b>Consequence:</b> Community unrest (rioting, disruption, violence)</p> <p><b>Risk Update:</b> The risk score has been increased due to the changing nature of events, which can quickly heighten issues and impact community tensions. The challenges relating to further enhancing community cohesion remain varied and complex. The ongoing conflict in the Middle East and the far-right violence and protests across the UK have impacted community tensions. Camden has experienced increases in hate crime, particularly antisemitic and Islamophobic offences, reflecting wider London trends. While overall volumes remain lower than London, the proportional rises highlight the continued impact of external events on local cohesion.</p> <p>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.</p> <p>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.</p> <p>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>						
Actions			Action owner	Status	Due date	Risk sponsor
1. Continue to work with the Police to influence the development of the Borough Policing plan			1. Patrick Coulson/Oliver Jones	1. In progress	1. Ongoing	D. Burns / H. Mohamed
2. Maintain the delivery and evaluation of the Camden Prevent programme.			2. Patrick Coulson/Oliver Jones	2. In progress	2. Ongoing	
3. Continue to hold regular Community Cohesion Tension Monitoring Group meetings.			3. Shaheda Rahman	3. In progress	3. Ongoing	
4. Maintain the delivery and evaluation of the Hate Crime dip sampling process in partnership with the Met Police.			4. Shaheda Rahman	4. In progress	4. Ongoing	

14. Landlord Duty of Care (including fire safety)			Existing Controls						
<b>Current Score: 10</b> (L:2, I:5)	<b>Target Score: 10</b> (L:2, I:5)	<b>Outlook:</b> Stable	<div><div>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. (FLAGEL)</div><div>2. Governance measures in place following the Regulatory Notice include a Council-wide governance board to cover all regulatory standards and a monthly report to members of Housing Scrutiny Committee and the Housing Fire &amp; Building Safety Panel.</div><div>3. Training requirements have been established with a fire &amp; building safety mandatory module introduced and training programme being developed for persons accountable under the Building Safety Act. Due Diligence Process in place for statutory declaration of competence fore principal designers, contractors and other professional advisers</div><div>4. Electrical Testing - in preparation for new legislative requirements for domestic electrical testing a 5- year internal fixed wire tests is now in place. The test programme monitored monthly as part of the FLAGEL process and the council has a plan in place for the introduction of mandatory electrical testing from November 2025.</div><div>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.</div><div>6. The fire safety capital works team and programme manager well established and delivered with capital expenditure on fire and building safety at £21.21m in 2024/25</div><div>7. Head of Resident &amp; Building Safety established and team in place. 3 Senior building safety managers oversea a team of 9 building safety managers responsible for monthly inspections of 188 HRBs and the preparation of building safety cases.</div><div>8. External BS9997 Audit of Fire Safety Management Systems completed.</div><div>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</div><div>10. The Gas Safety Case inspections continue in line with regulatory requirements, reflecting the Council's status as a gas transporter.</div></div>						
<b>Risk:</b> Breach of statutory duties as a landlord (including tenant management organisations) <b>Cause:</b> Non-adherence to or insufficient policies and procedures, insufficient resources <b>Consequence:</b> Injury or fatality, impact on resident well-being, reputational damage, prosecution and / or fines <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 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; as at 1 September 2025 this figure is now 2,405. The Council continues to focus on all overdue actions to get to a position of business as usual. The Council closed 8,848 actions in the rolling 12 months up to 1 September 2025. Contractor and skilled resources remain a challenge, combined with 'no access' to properties. Other specific work includes: <ul style="list-style-type: none"><li>- Chalcots estate – recladding works in progress at all 5 towers. This will see an A1 fire rated façade installed, part funded by the ACM remediation fund. The Chalcots remedial works programme will complete by the end of 2025/26</li><li>- Birkenhead Estate – further funds were secured from the Cladding Safety Scheme to remediate the external wall insulation to three blocks and works are programmed to complete by December 2026</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> The Council has a programme in place to manage the implementation of recommendations from the Grenfell Inquiry report adopted by government as new regulations are published between now and 2028. To date the Council has submitted 12 building safety cases (BSC) as required by the Building Safety Regulator who has completed assessment of 4 BSCs and issued 4 Building Assessment Certificates. In June 2025 there was a fatality on a Camden estate, relating to a fall from a balcony which is currently subject to HSE / Police investigation. Remedial works are being designed and the 100% internal surveys currently underway include additional questions about balconies.									
<b>Actions</b>		<b>Action owner</b>					<b>Status</b>	<b>Due Date</b>	<b>Risk sponsor</b>
1. 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) Development of Person-Centred Fire Risk Assessment process in preparation for implementation if Residential Personal Emergency Evacuation Plan Regulations in April 2026		Gavin Haynes					1. In progress	1. Ongoing	G. Marston
2. Deliver the Regulatory Notice action plan and report on progress to the Regulator of Social Housing.							2. In progress	2. Ongoing	



15. Safeguarding Children			Existing Controls			
<b>Current Score: 10</b> (L:2, I:5) <b>Target Score: 10</b> (L:2, I:5) <b>Outlook:</b> Stable						
<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), legal action against the council</p> <p><b>Risk Update:</b> Camden’s children’s safeguarding and social work was rated as outstanding in the 2025 in all areas in our recent Ofsted inspection, which provides assurance of the quality of practice in the borough. Our YJS was assessed as outstanding under the new framework, the first in the country. We contributed to the CQC inspection of ASC for 18-25’s which also received an overall rating of outstanding.</p> <p>The service has been engaging in development and discovery work in preparation for the national children’s social care reform which is a major transformation initiative aimed at improving outcomes for children, young people, and families. Camden has received £953k funding to support reform transformation during 2025/26. The reforms will require children’s social care services to change their practice and ways of working, and Camden has established three blocks of transformational change which will be delivered by end of March 2026:</p> <ul style="list-style-type: none"><li>• Establishment of Family Help which will merge Early Help and Child in Need functions</li><li>• Establish multi agency child protection teams to strengthen inter-agency collaboration</li><li>• Family Network and family plan approaches to support kinship care</li></ul> <p>The ambition of these reforms is to shift focus from crisis intervention to early support to deliver better outcomes for children and families in Camden.</p> <p>Recruitment and retention issues have improved compared to the last report, but it is still a challenging market and continues to be monitored closely.</p> <p>Challenges remain around the cost and available housing options for care placements, and the service is working on sufficiency of placements for care experienced young people.</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 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 are in place to ensure regulatory functions are in line with National Minimum Standards as an agency.</li><li>11. Cross council review-the work of the VAGW Board is working will internal and external stakeholders</li><li>12. Visiting and plans are in place for every child who have had an assessment.</li><li>13. Contact for children in care is supervised by staff.</li><li>14. Liaison with partners for oversight and guidance is ongoing through a variety of forums.</li><li>15. National Reform has significant governance in place through operational and strategic reform boards to ensure scrutiny and governance. We continue oversight of the sufficiency work through the sufficiency board to ensure progress.</li></ol>			
Actions			Action owner	Status	Due Date	Risk sponsor
<ol style="list-style-type: none"><li>1. Deliver national reform transformation programme</li><li>2. Continued focus on recruitment and retention, fully operational multi-agency front door</li><li>3. Continued focus on sufficiency of care placements</li></ol>			Rashida Baig	<ol style="list-style-type: none"><li>1. In progress</li><li>2. In progress</li><li>3. In progress</li></ol>	<ol style="list-style-type: none"><li>1. March 2026</li><li>2. Ongoing</li><li>3. Ongoing</li></ol>	T. Aldridge

16. Emergency Preparedness, Response and Recovery			Existing Controls		
<b>Current Score: 10</b> (L:2, I:5) <b>Target Score: 6</b> (L:2, I:3) <b>Outlook:</b> Stable			<ol style="list-style-type: none"><li>1. Each Service is required to have their own Business Continuity Plan (BCP). Services holding critical activities have been given additional support.</li><li>2. The Resilience team provides BCP templates and training, based on accessible platform.</li><li>3. The Corporate Resilience Assurance Group (CRAG) has been re-established with new membership and ToR with the aim of providing corporate level assurance – chaired by Exec Director</li><li>4. The Emergency Response Team is strengthened and maintains 24/7 coverage across key response roles at all levels.</li><li>5. The service is self-assessed against the London Resilience Standards for local authorities and peer discussion takes place within the North Central Cluster.</li><li>6. Mutual aid arrangements are in place and available from across London, coordinated via the London Resilience Unit</li><li>7. Clear leadership structure strengthened/in place – Head of Corporate Resilience, Director of Recreation and Public Safety.</li><li>8. External and internal notification lists developed to ensure the Council are alerted to incidents quickly</li><li>9. Strengthening of Resilience Advisor role and contact method – the first point of contact for external agencies to notify the local authority of a major incident</li></ol>		
<b>Risk:</b> Council lacks appropriate preparedness and resilience in response to a major incident.					
<b>Cause:</b> Lack of resource, lack of service direction, availability of wider resource network (on-call). IT system reliance. Incomplete/out of date Business Continuity Plans.					
<b>Consequence:</b> Failure to provide appropriate resources for residents, businesses or visitors and/or sustained inability to deliver critical services and non-compliance with the Civil Contingencies Act 2004					
<b>Risk Update:</b> A programme of key projects is currently underway to strengthen our baseline preparedness and ensure that the fundamental requirements are being developed in line with the Civil Contingencies Act 2004 and the London Resilience Standards for local authorities. Given the work to be delivered to strengthen the fundamental pillars of effective incident response, the risk score has been increased to reflect this. The focus of this work includes: <ul style="list-style-type: none"><li>• <b>Emergency Centre Arrangements:</b> We are identifying suitable locations across the Borough for emergency centres, securing essential equipment to meet residents' immediate needs, and training staff to support the community during emergencies.</li><li>• <b>Borough Emergency Control Centre:</b> This project involves relocating the existing control centre to a new site and developing the operational procedures required for its activation and use.</li><li>• <b>On-Call and Planning Arrangements:</b> We are enhancing our generic emergency response and recovery plans, building on previous work. This includes improving the management of the on-call rota and transitioning to a web-based tool to ensure it remains up-to-date and accessible.</li><li>• <b>Emergency Response Team Development:</b> This initiative is focused on strengthening our core 24/7 response capability, ensuring we always have a sufficient number of trained council staff available. It covers the full structure of response roles, including Gold (strategic), Silver (tactical), and Bronze (operational).</li></ul>					
In addition to these projects, significant work has taken place to strengthen our internal business continuity arrangements across all council services. This work has been assessed by Internal Audit and was signed off in Q1 2025/26, recognising a cross-service effort to provide assurance of our business continuity preparedness. This is subject to an annual cycle of review, with the next round of review due Q3 2025/2026.					
Actions	Action owner	Status	Due Date	Risk sponsor	
<ol style="list-style-type: none"><li>1. Emergency Centre programme delivered</li><li>2. Borough Emergency Control Centre programme delivered</li><li>3. On-call rota and Planning arrangements programme delivered</li><li>4. Emergency Response Team programme delivered</li></ol>	Oliver Jones / Glen Curry	<ol style="list-style-type: none"><li>1. In progress</li><li>2. In progress</li><li>3. In progress</li><li>4. In progress</li></ol>	<ol style="list-style-type: none"><li>1. Dec 2025</li><li>2. Dec 2025</li><li>3. Dec 2025</li><li>4. Dec 2025</li></ol>	D. Burns	

17. Community Investment Programme (CIP)			Existing Controls			
<div>Current Score: 9 (L:3, I:3)Target Score: 9 (L:3, I:3)Outlook: Stable</div> <p><b>Risk:</b> The Council does not deliver on Cabinet agreed Community Investment Programme (CIP) delivery ambition figures.</p> <p><b>Cause:</b> affordability challenges, 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> In the last year, CIP has been successful in securing additional grant from the Greater London Authority (GLA) Affordable Homes Programme, the Ministry of Housing, Communities and Local Government (MHCLG) Local Authority Housing Fund and the GLA's London Estate Regeneration Fund grant funding. In addition, CIP has worked with planning officers to de-risk two sites by identifying them as donor sites for s106 affordable homes payments. The developer payments in these two schemes will support an increase in affordable housing delivery in the borough while reducing the Council's financial exposure.</p> <p>CIP's mixed delivery model helps the Council manage the inherent risk of a development programme. The delivery route of CIP schemes is flexible, and the programme uses a mixture of direct delivery and partnership arrangements to de-risk the programme. The residential market in London remains subdued, but viability challenges are showing some signs of easing. There is currently only one CIP scheme with private sale homes and sales are progressing in line with forecasts. A new scheme with private sale homes will be completed in early 2026 and the team is working on the sales strategy to ensure best outcomes. CIP teams continue to challenge contract costs and negotiating and seeking value engineering solutions to reduce risks.</p> <p>CIP projects have a robust set of control measures in place. The market has also stabilised somewhat after a very volatile few years and the team have secured mitigations such as additional grant and identifying donor sites for s106 funding. Given this, the risk is assessed as reduced compared to the last report.</p>			<div>1. 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.</div> <div>2. 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 undertaken to ensure finances and impacts are scrutinised.</div> <div>3. 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 in line with forecasts and the sales team reviews strategies on all schemes. Where possible, CIP looks for additional grant opportunities to reduce exposure to sales market.</div> <div>4. Progress on CIP schemes is monitored on a monthly basis with key risks and issues identified and addressed through governance boards.</div> <div>5. CIP is subject to a yearly internal audit as well as a yearly GLA audit. Lessons are learnt continuously and implemented to ongoing projects.</div> <div>6. 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.</div> <div>7. The 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.</div> <div>8. 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.</div> <div>9. CIP schemes have an Employers Agent who certifies that contracts awarded represent value for money.</div>			
Action			Action owner	Status	Due Date	Risk sponsor
<div>1. 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.</div> <div>2. Secure amortised loans through the newly announced Social and Affordable Housing Programme 2026-36 to enhance affordability and maximise affordable housing delivery.</div>			Noe Ardanaz Ugalde	In progress	March 2026	D. Burns

18. Special Educational Needs and Disability Funding and Provision			Existing Controls			
<b>Current Score: 9</b> (L:3, I:3)	<b>Target Score: 9</b> (L:3, I:3)	<b>Outlook:</b> Increasing	<ol style="list-style-type: none"> <li>1. School Sufficiency Programme (initiated May 2025): A borough-wide strategic programme structured around three pillars — School Finance, School Admissions, and SEND — providing targeted support, mitigation, and intervention to schools.</li> <li>2. High Needs Sub-Group: A standing group of school and local authority leaders overseeing the High Needs Block, monitoring expenditure and delivery, and leading development of a High Needs Block Action Plan to manage and mitigate financial risks.</li> <li>3. Inspection Readiness Group: A fortnightly partnership group (Education, Health, and Social Care) focused on SEND Inspection Readiness, developing and reviewing the Self-Evaluation Framework (SEF) and key areas of focus. Progress is tracked through fortnightly meetings and fortnightly updates to C&amp;L DMT.</li> <li>4. Reorganisation of SEND Service (2025): Strengthened structure and processes to manage demand, improve timeliness and quality, and enhance joint working.</li> <li>5. Complaints and Quality Assurance Oversight: Regular review of complaints and learning themes to identify service improvements and improve first-time resolution, reducing escalation risk.</li> </ol>			
<p><b>Risk:</b> There are ongoing and systemic pressures on the sustainability of SEND funding and provision, both nationally and locally. London Councils forecast a £500m cumulative deficit in SEND provision by the end of 2026/27, reflecting the scale of financial challenge across the region.</p> <p><b>Cause:</b> Significant increase in the number and complexity of children with Education, Health and Care Plans (EHCPs). Government funding has not kept pace with the rapid rise in demand. Recruitment and retention challenges across education, health, and social care services. Inconsistent commissioning and limited flexibility in local placement options. Fragmented system arrangements and limited capacity within partner agencies to meet statutory responsibilities.</p> <p><b>Consequence:</b> Under-resourced services and increasing strain on the workforce. Longer waiting times for assessments and support, leading to family frustration. Growing reliance on high-cost agency staff to meet statutory duties. Escalation of legal challenge and complaints due to delays and perceived unmet need. Poorer outcomes for children and young people with SEND. Reputational risk associated with a potential CQC and Ofsted Local Area SEND Inspection, given the variability in local areas.</p> <p><b>Risk Update:</b> The SEND system nationally remains under significant pressure. Camden is actively engaged in the Department for Education's Change Programme, contributing to the testing of potential future reforms to the SEND and Alternative Provision system. A Government White Paper is expected in Autumn or Spring Term, setting out next steps for national SEND reform and funding arrangements. Camden's involvement in this work ensures early engagement with emerging policy and opportunities to shape future delivery models.</p> <p>Over the past year, Camden's SEND service has experienced sustained pressure due to the combined effect of:</p> <ul style="list-style-type: none"> <li>• Increased volume and complexity of EHC requests,</li> <li>• Service reorganisation and recruitment activity, and</li> <li>• Capacity constraints across partner agencies, has created variability in performance and compliance.</li> </ul> <p>To address these challenges, the service has undergone a reorganisation, designed to improve operational delivery and outcomes for children and young people with SEND. The new structure includes:</p> <ul style="list-style-type: none"> <li>• Additional dedicated capacity for managing EHC needs assessments.</li> <li>• Creation of Quality Assurance and Family Engagement teams.</li> <li>• Strengthened focus on joint working across education, health, and social care.</li> </ul>						
Actions			Action owner	Status	Due Date	Risk sponsor
<ol style="list-style-type: none"> <li>1. Continued oversight of local area's preparedness and readiness for inspection through fortnightly meetings and monitoring of inspection action plan</li> <li>2. Continued oversight of the high needs block through meetings with school leaders and internal HNB meetings (monthly) which will have oversight of the three strands of work referenced within the action plan with focus on strengthening internal processes, improving commissioning arrangements and developing additional provision on locally to mitigate financial risks.</li> <li>3. Strengthening oversight over complaints and quality assurance: weekly meetings to review complaints and tribunals stood up. Performance reported to QA board. Standardising practice across Children and Learning Directorate in response to complaints to ensure learning is built back into the service.</li> </ol>			Vikram Hansrani	<ol style="list-style-type: none"> <li>1. In progress</li> <li>2. In progress</li> </ol>	<ol style="list-style-type: none"> <li>1. Ongoing</li> <li>2. Ongoing</li> <li>3. Ongoing</li> </ol>	T. Aldridge



19. Information Governance			Existing Controls				
<b>Current Score: 9</b> (L:3, I:3) <b>Target Score: 6</b> (L:2, I:3) <b>Outlook:</b> Stable			<div>1. GDPR/Information Handling training module in place. Compulsory training on Information Handling/Data protection awareness for all staff. Bespoke data protection training provided by the Data Protection Advice Team to Housing Teams, Social Work Teams</div> <div>2. Information Asset Register in place and review plan in place to ensure it contains all necessary information.</div> <div>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.</div> <div>4. Data breach notification procedure in place.</div> <div>5. Additional email controls have been deployed to Adult and Children’s Services, using a dictionary of keywords developed in collaboration with both teams, to shape the policies. The next step is to extend these controls across the organisation in monitoring mode, providing greater visibility into where our data is going and helping to inform future decisions.</div> <div>6. to reduce risk of data breaches in the service.</div> <div>7. Data Protection Impact Assessment (DPIA) Procedure in place, Templates available on Essentials. All pre-screens and full DPIAs are proactively published</div> <div>8. 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</div> <div>9. Retention Schedule complete and an ongoing programme of retention/destruction of paper records at the end of their retention period is in place.</div> <div>10. Emails containing sensitive data are sent securely via Egress, Azure Information Protect (AIP) &amp; Office 365 Encryption.</div> <div>11. Strategic Corporate Information Governance in place, with operational subgroups.</div>				
<b>Risk:</b> Major breach of Data Protection legislation							
<b>Cause:</b> Non-compliance with Information in Camden and IT policies. Staff not appropriately trained in information handling and data protection. 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>							
<p>Data breaches - There have been two reportable breaches reported to the Information Commissioner’s Office (ICO) since the last report, with no further action taken by the regulator. The team continue joint work with the Digital and Data Service to strengthen information governance processes, including the maintenance of the Information Asset Register (IAR) and classification of Data Assets. Procurement is underway for a new master data management system which will support information handling processes and keeping data safe.</p> <p>A project is being delivered to reduce the number of documents being stored at Crowndale to ensure records are appropriately retained and archived, and to free up space at Crowndale.</p> <p>The team continues to be proactive in communication and awareness raising of staff’s responsibilities on information handling and data protection to reduce the risk of human error resulting in a data breach.</p> <p>The risk is assessed as being reduced compared to the last report following the implementation of actions from the 2023 data governance review.</p>							
Actions			Action owner		Status	Due Date	Risk sponsor
1. Provide awareness raising and training to IAOs to know their responsibilities.			1. Sarah Laws		1. In progress	1. Ongoing	H. Mohamed / K. Myers
2. Procurement of master data management system			2. Martin Waudby		2. In progress	2. Ongoing	
3. Deliver project to address the volume of paper records held at Crowndale			3. Andrew Maughan		3. In progress	3. Jan 2027	

20. Medium Term Financial Strategy (MTFS) Programme Delivery			Existing Controls		
<b>Current Score: 9</b> (L:3, I:3)	<b>Target Score: 6</b> (L:3, I:2)	<b>Outlook:</b> Stable	<div>1. CMT 'deep dives' on key (high risk) projects as part of the CMT Oversight panels.</div> <div>2. CMT updates on level of savings proposals being developed. including total value of proposals and risk scores for each proposal</div> <div>3. Quarterly updates to DMTs and to CMT on the delivery of the existing MTFS savings.</div> <div>4. Additional savings via vacancy factor lessen the impact of non-delivery of some MTFS projects.</div>		
<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></p> <p>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. The Council is closely monitoring its medium-term position in response to high inflationary pressures and demand 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 three years of the 2023/24-2025/26 MTFS. 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>Should additional MTFS proposals be required, this 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.</p> <p>The Council is also considering its approach once the current MTFS concludes. The upcoming three-year settlement will likely provide some additional certainty on funding levels, helping the Council better understand any budget gap.</p>					
Actions		Action owner	Status	Due Date	Risk sponsor
1. Continue to monitor and report on the MTFS programme - new proposals and progress of the MTFS programme reported to CMT at regular intervals.		Daniel Omisore	In progress	Ongoing	D. Omisore / H. Mohamed / K. Myers

21. School sufficiency and financial viability			Existing Controls			
<b>Current Score: 9</b> (L:3, I:3)	<b>Target Score: 9</b> (L:3, I:3)	<b>Outlook:</b> Increasing	<p>6. In May 2025 the Council initiated a School Sufficiency programme that provides support, mitigation and intervention to schools. The programme has been developed around 3 pillars of School Finance, School Admissions and SEND.</p> <p>7. Council has developed and approved and is implementing the Camden Education Strategy 'Building Back Stronger', with a specific focus on increasing collaboration between schools.</p> <p>8. Council has set up a school places planning advisory of key officers and school leaders to review and approve school organisation strategy alongside specific implementation plan.</p> <p>9. 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.</p> <p>10. Officers report annually through the Scrutiny Committee, Schools Forum and the ILR report on all metrics relating to school financial</p>			
<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 and increased demand for pupils with additional need.</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 alongside a sustained growth in pupils with additional and acute needs.</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 High Needs Block funding and individual school budgets.</p> <p><b>Risk Update:</b> The Council continues to monitor and respond to changes in demand. Council for entry in 2025 has continued to support schools in managing Published Admission Number changes. In the medium-term significant vacancies remain in a number of specific schools. Reductions in demand for primary school places is also leading to reduction in demand for secondary school places. In the 2024/25 financial year this has had an acute negative effect on overall school balances. The number of schools in a culminative deficit increased from 8 to 12 and the number of schools making uses of reserves increased to 22. Furthermore, the increased pressure on the high needs funding block has reduced reserves by £4.8m with a further reduction of £8.4m anticipated in 2025/26 moving the block into deficit.</p>						
Actions			Action owner	Status	Due Date	Risk sponsor
<p>4. Delivery of Camden Education Strategy</p> <p>5. Monitor changes in government policy related to the School Governance</p>			Vikram Hansrani	<p>3. In progress</p> <p>4. In progress</p>	<p>4. 2030</p> <p>5. Ongoing</p>	T. Aldridge

22. Pupil Achievement			Existing Controls			
<b>Current Score: 9 (L:3, I:3)</b> <b>Target Score: 9 (L:3, I:3)</b> <b>Outlook:</b> Increasing			<ol style="list-style-type: none"> <li>1. Camden Learning is specifically commissioned to focus on School Performance and pupil outcomes and on closing attainment gaps between different socio-economic groups.</li> <li>2. Council has increased resource within the Camden Learning contract to supplement the Council's approach to tackling attendance.</li> <li>3. 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>4. Council is embedding its Early Years strategy and approach including investing in 1001 days and the PCPS programme.</li> </ol>			
<p><b>Risk:</b> Key Stage 4 performance and attendance within Camden Schools.</p> <p><b>Cause:</b> There are multivariate issues that contribute to pupil achievement. For example, these include parental involvement and ability to engage with children's education (barriers including language) and wider school attendance, the quality of teaching and learning and differential access to education facilities and opportunities 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 2025 (formal validation Jan 26) indicate that Camden Schools' performance in statutory examinations has held up well in the Primary Sector. However, the Secondary (KS4) pupil outcomes in statutory examinations are below expected standards. The Council continues to identify attendance as key concern within our Secondary Cohort. The contract with Camden Learning is entering its third year and these indicators will be included within any recommission activity. The Council continues to implement its education strategy 'Building Back Stronger' to address concerns and challenges around achievement and deliver its vision for Camden pupils.</p>						
Actions			Action owner	Status	Due Date	Risk sponsor
<ol style="list-style-type: none"> <li>1. Consistent and timely oversight and management of the Camden Learning Commission</li> <li>2. Implement Building Back Stronger strategy</li> </ol>			Vikram Hansrani	<ol style="list-style-type: none"> <li>1. In progress</li> <li>2. In progress</li> </ol>	<ol style="list-style-type: none"> <li>1. Ongoing</li> <li>2. Ongoing</li> </ol>	T. Aldridge

23. Fire Safety (in relation to private building owners)			Existing Controls		
<b>Current Score: 9 (L:3, I:3)    Target Score: 6 (L:2, I:3)    Outlook: Stable</b>			<ol style="list-style-type: none"> <li>1. We continue to work 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. Where we have concerns about buildings, owners have put other measures in place, such as a move to evacuation policies in some flats and upgraded alarm systems in place, to reduce likelihood.</li> <li>4. Housing Act 2004 Duties – service of improvement notices and enforcement action where no progress. 10 served to date. We are considering one Civil Penalty for non-compliance with an Improvement Notice.</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 reviewed processes around fire safety in connection with cladding concluded, with all recommendations implemented.</li> </ol>		
<p><b>Risk:</b> Private sector accommodation in tall and medium 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 and medium residential buildings. Local government enforcement powers are extremely slow and can take many years for the work to come to completion. 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.  Dangerous ACM has been dealt with and removed in larger blocks. Remaining ACM is being dealt with as we go forward.  Since the team started in 2017, we have opened 47 cases for privately owned tall buildings in Camden with external wall systems. 8 have been closed as they have been resolved by informal intervention. 12 notices have been served. The remaining 27 cases are in the process of being monitored and investigated where necessary.  Local Authorities have been tasked with looking at defective cladding in medium rise properties. MHCLG has provided the Council with a list of 11,000 midrise buildings in Camden as a data share from the Cladding Safety Scheme, significantly higher number than high rise properties. The team is now prioritising these and carrying out some enforcement action. There is an expectation that resourcing will be needed for at least ten years.</p>					
Actions		Action owner	Status	Due Date	Risk sponsor
<ol style="list-style-type: none"> <li>1. Monitor the development of the Fire Safety Act and Building Safety Act reforms. Continue appropriate enforcement action.</li> <li>2. Take balanced approach to securing remediation of high-rise buildings with defective cladding. Monitoring where appropriate, taking enforcement action if necessary.</li> <li>3. Preparing action plan in response to a widened scope which includes medium rise properties.</li> </ol>		Glendine Shepherd / Darren Wilsher	<ol style="list-style-type: none"> <li>1. In progress</li> <li>2. In progress</li> <li>3. In progress</li> </ol>	<ol style="list-style-type: none"> <li>1. Ongoing</li> <li>2. Ongoing</li> <li>3. Nov 2025</li> </ol>	G. Marston

24. Compliance Against Consumer Standards			Existing Controls				
Current Score: 9 (L:3, I:3)	Target Score: 3 (L:1, I:3)	Outlook: Stable	<div>1. Housing Safety and Regulatory Board, chaired by the Executive Director Supporting Communities.</div> <div>2. Continued self-assessment against the consumer standards through the commissioning of third-party expertise as required</div> <div>3. Third party assessment of compliance on TSM management measures</div> <div>4. Detailed review of the performance measures being introduced by the Regulator and benchmarking against comparator organisations</div> <div>5. Proactive dialogue with the Regulator as part of its more focussed discussions on the Regulatory Notice</div> <div>6. New governance arrangements in place to monitor progress, chaired by Executive Director Supporting Communities</div> <div>7. Alignment of the Housing and Repairs transformation programme with the requirements of the Consumer Standards</div> <div>8. Detailed work on the stock condition survey outputs, the forecast decent homes position and performance against the Asset Management Strategy</div>				
<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 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 and has also submitted in June 2025 for the period 1 April 2024 to 31st March 2025.</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 being a compliant position. So far two London boroughs have achieved a C1 (Westminster and Enfield) and a further two have achieved a C2 (Lambeth and Waltham Forest). Camden is currently in active dialogue with the Regulator as part of the Voluntary Undertaking following the Regulatory Notice. 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. Camden's mock inspection and data audit which took place in Spring 2025 showed strong plans in place, but a need for many of these plans to take effect before we can be fully assured, for example around information we hold on tenants.</p>							
Actions			Action owner	Status	Due Date	Risk owner	
1. Review findings of third-party expert audit and assessment against standards, repeating annually.			Gavin Haynes	1. In progress	1. Jan 2026	G Marston	
2. Proactive engagement with Regulator as part of ongoing work on Regulatory Notice				2. In progress			
3. Continued work to review the Council's position against the Consumer Standards				3. In progress			2. Ongoing



25. Complaints in housing repairs			Existing Controls		
<b>Current Score: 9</b> (L: 3, I: 3)	<b>Target Score: 2</b> (L: 2, I: 1)	<b>Outlook: Stable</b>	<ol style="list-style-type: none"> <li>1. Annual self-assessment on compliance with Housing Ombudsman Complaints Handling Code (new regulatory requirement from April 2024)</li> <li>2. Annual Complaints Handling and Service Improvement Report (new regulatory requirement from April 2024)</li> <li>3. Annual Complaints Report to monitor trends and identify areas for improvements.</li> </ol>		
<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 conditions or the delivery of repairs, 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></p> <p>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. In 2024/25 the Council received 2,479 landlord related stage 1 complaints, compared to 1,564 in 2023/24. This reflects national trends whereby the Ombudsman has reported a staggering 474% increase in complaints concerning the condition of social rented homes and how repairs are handled across the UK, with about 47% of their cases generated within London. It is noted that Camden's proactive outreach has also resulted in increased reporting of complaints and there has been a corresponding increase in the number of Camden 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). 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, resulting in higher levels of compensation being awarded. The Housing Ombudsman has now concluded its investigation into Camden's handling of leaks, damp and mould, complaints, and repairs, and their findings were published November 2024. Between November 2024 and July 2025, the Council put in place significant improvements to address the recommendations made, working to go beyond the essential work to and adopt best practice. This includes changes to how we work and the systems supporting our services. Of the 13 recommendations, 10 related to complaints handling. The Council worked closely with the HO on its action plan and this was fully signed off by HO in July 2025 with a report provided to the Housing Scrutiny Committee in Sept 2025. The action plan from the HO report was developed jointly by the service and the central complaints team.</p>			<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 an additional Lessons Learned Lead post to analyse neighbourhood cases</li> <li>6. Introduction of a 'completions team' to focus on the completion of actions in complaint responses – helping to reduce escalations to stage 2.</li> <li>7. Creation of the Housing Customer Oversight panel that reviews current trends and concerns and improvements needed going forward</li> <li>8. 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> </ol>		
Actions		Action owner	Status	Due Date	Risk sponsor
<ol style="list-style-type: none"> <li>1. Continue to provide regular reports to the Housing Board</li> <li>2. Implement changes to case management processes to ensure effective collaboration between teams to resolve complaints.</li> </ol>		G. Haynes	<ol style="list-style-type: none"> <li>1. In progress</li> <li>2. In progress</li> </ol>	<ol style="list-style-type: none"> <li>1. Ongoing</li> <li>2. Ongoing</li> </ol>	G. Marston

26. Contract Management and Procurement			Existing Controls			
<b>Current Score: 9</b> (L:3, I:3)	<b>Target Score: 6</b> (L:2, I:3)	<b>Outlook:</b> Increasing	<ol style="list-style-type: none"> <li>Each Directorate owns their individual contracts and monitors the risks for the contracts, with support from procurement as and when required. Contract managers are responsible for timely escalation of supply chain issues to DMTs and Executive Directors.</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 in place for corporate overview and support to contract managers. Contract pipeline published which enables forward planning, resource allocation, and strategic decision making across directorates.</li> <li>Procurement Board papers highlight statutory notice requirements under PA23 supporting the procurement team and contract managers in identifying and publishing new PA23 notices in a timely and compliant manner.</li> <li>Contract Managers Forum on Teams and Viva Engage for sharing requirements, guidelines and best practice processes.</li> </ol>			
<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. Lack of capacity in the procurement team, inadequate capabilities across directorates.</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, high pressure on the procurement team could lead to mistakes and oversights which may delay procurement and projects.</p> <p><b>Risk Update:</b> The Procurement Act 2023 came into effect in February 2025 and incorporates elements of contract management. 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 Act introduced a range of new requirements aimed at enhancing transparency around public procurement and has necessitated new processes and ways of working to be introduced. This has added significant additional pressure on the procurement team and ways to address this is being explored to ensure timely support to contract managers and also protect the wellbeing of staff in the procurement team.</p> <p>The team have ongoing conversations with contract managers to ensure robust supply chain monitoring and management and that contingency plans are in place in the event of supplier failure. Existing guidance and training for contract managers are being reviewed to ensure enhanced capabilities in assessing risk in the supply chain.</p> <p>The forward outlook over the next twelve months is assessed as increasing given the pressure on staff to meet new requirements as well as the new skills and capabilities of contract managers which is being embedded. Additional parts of the Act are still to come into effect and during this transition period there may be increased risk on non-compliance.</p>						
Actions			Action owner	Status	Due Date	Risk owner
<ol style="list-style-type: none"> <li>Engage with contract managers to raise awareness of their new responsibilities in relation to publishing notices and managing and reporting on supplier performance.</li> <li>Develop and launch new training module on contract management that incorporates the new regulations.</li> <li>Complete testing and implementation stage of new IT system to support the digital and transparency requirements of the Act and create efficiencies in the end-to-end procurement administration process.</li> <li>Comprehensive review of procurement processes as part of the redesign programme, aimed at streamlining workflows, reducing manual effort, and enabling the team to better manage increasing demands.</li> </ol>			<ol style="list-style-type: none"> <li>Nicole Penn</li> <li>Nicole Penn</li> <li>Nicole Penn / Digital Team</li> <li>Nicole Penn</li> </ol>	<ol style="list-style-type: none"> <li>In progress</li> <li>In progress</li> <li>In progress</li> <li>In progress</li> </ol>	<ol style="list-style-type: none"> <li>Ongoing</li> <li>Dec 2025</li> <li>Dec 2025</li> <li>Dec 2025</li> </ol>	D. Burns



27. Significant Health and Safety Incident (Occupational)			Existing Controls		
<b>Current Score: 8</b> (L:2, I:4)	<b>Target Score: 6</b> (L:2, I:3)	<b>Outlook: Stable</b>	<ol style="list-style-type: none"> <li>1. Corporate health and safety policies and guidance 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 for all staff</li> <li>4. Health and safety management courses and risk assessment training available and promoted</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 training and lone worker devices available for services where higher risk has been identified.</li> <li>8. Wellbeing strategy in place with targeted wellbeing interventions based on data.</li> <li>9. Incident reporting system in place with trends monitored and discussed at committee</li> <li>10. Ongoing programme of random drug and alcohol testing for staff in safety critical roles</li> <li>11. Weekly co-ordination meetings of public facing services in 5PS now established.</li> </ol>		
<p><b>Risk:</b> The Council fails to adequately manage its health and safety obligations leading to significant health and safety incident and/or regulatory enforcement action</p> <p><b>Cause:</b> Governance and/or policies are inadequate, staff non-compliance with policies, staff not completing mandatory health and safety training, changes in regulatory standards, poor incident reporting and follow-up</p> <p><b>Consequence:</b> Incident resulting in life changing or fatal outcomes, legal/enforcement action, staff absence, financial penalties, reputational damage</p> <p><b>Risk Update:</b> The corporate health and safety policy was reviewed and updated in summer 2025 to ensure it remains fit for purpose. The Substance Misuse Policy was updated in August 2025 to incorporate use of medical cannabis. Property services are undergoing a review of their policies and guidance to ensure these are aligned with statutory requirements. There is additional safety training being sourced for senior leadership to support a positive health and safety culture within the council.</p> <p>Data indicates there has been an increase in violence and aggression against staff in public facing roles by members of the public and staff are actively encouraged to report all incidents. Some incidents go unreported which creates a challenge in understanding trends and level of risk in services. The team is holding meetings with public facing services in 5PS to review incidents and agree actions to support frontline staff. Several bans have been issued to date. The team continue to promote the incident reporting tool and monitor data from health and safety incidents and near misses.</p> <p>A centralised caution register within the Customer Relationship Management (CRM) system is being piloted within corporate services to test the processes and generate learning before full roll-out. Some caution flags have been raised following significant incidents.</p> <p>The risk of the Council not meeting its statutory obligations in relation to health and safety is assessed as reduced compared to last year, with key pieces of work delivered since the last report.</p>					
Action	Action owner	Status	Due Date	Risk sponsor	
<ol style="list-style-type: none"> <li>1. Support Digital &amp; Data Services with the development and wider roll out of the caution register across the council.</li> <li>2. Explore the possibility of launching new safety training for executive directors and property management senior leadership team.</li> <li>3. Coordinate a review of each directorate's risk management arrangements with services</li> </ol>	<ol style="list-style-type: none"> <li>1. Darren Williams</li> <li>2. Property &amp; Corporate Health and Safety Managers</li> <li>3. Corporate Health and Safety Advisors</li> </ol>	<ol style="list-style-type: none"> <li>1. In progress</li> <li>2. Planned</li> <li>3. In progress</li> </ol>	<ol style="list-style-type: none"> <li>1. March 2026</li> <li>2. Jan 2026</li> <li>3. March 2026</li> </ol>	<ol style="list-style-type: none"> <li>1. K. Myers / H. Mohamed</li> <li>2. G. Marston</li> <li>3. K. Myers / H. Mohamed</li> </ol>	

28. Housing Delivery			Existing Controls		
<b>Current Score: 8</b> (L:4, I:2)	<b>Target Score: 6</b> (L:3, I:2)	<b>Outlook:</b> Stable	<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 annually</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>		
<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 2024/25 showed a significant increase in delivery compared to recent years but is still below borough's challenging housing target and it is not expected that delivery in coming years will maintain this level given the pipeline of housing sites. 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.</p> <p>The Greater London Authority is in the process of developing the next London Plan and has almost completed 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 Plan. The Council has fed into this work and will engage in the London Plan update to seek to ensure Camden's future housing targets are set an appropriate level. Future housing capacity in the borough is limited due to the limited number of suitable sites, which means the future target for Camden is likely to be challenging. It is anticipated that a draft revised London Plan will be published in May 2026 and that the outputs of the capacity work will be published at the same time. Camden's updated Local Plan will be submitted to the Planning Inspectorate for public examination in Autumn 2025. It is envisaged that the updated plan will be adopted by the Council in late 2026.</p>					
Action		Risk owner	Status	Due Date	Risk sponsor
<ol style="list-style-type: none"> <li>1. Deliver Housing Delivery Action Plan, including monitoring the pipeline of sites</li> <li>2. Participation in the public examination of the Camden Local Plan</li> <li>3. Participation in London-wide housing capacity work and the review of the London Plan</li> </ol>		<ol style="list-style-type: none"> <li>1. Daniel Pope</li> <li>2. Daniel Pope</li> <li>3. Daniel Pope</li> </ol>	<ol style="list-style-type: none"> <li>1. In Progress</li> <li>2. In Progress</li> <li>3. In Progress</li> </ol>	<ol style="list-style-type: none"> <li>1. Ongoing</li> <li>2. Dec 2026</li> <li>3. Dec 2026</li> </ol>	D. Burns

29. Serious Fraudulent Activity			Existing Controls			
<b>Current Score: 4</b> (L:2, I:2) <b>Target Score: 4</b> (L:2, I:2) <b>Outlook:</b> Stable						
<p><b>Risk:</b> Serious fraud or corruption. Serious fraud is a broad definition for a number of different crimes. These types of crimes are standard offences of fraud but relating to higher values and are usually committed alongside other related offences such as bribery.</p> <p><b>Cause:</b> Lack of adequate governance arrangements, including key controls and fraud awareness</p> <p><b>Consequence:</b> Financial loss and reputational damage to the Council as a result of significant and high value fraud</p> <p><b>Risk Update:</b> 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.</p> <p>The Anti-Fraud and Investigations Team (AFIT) continue to work with relevant services, providing oversight and control design advice, where needed. 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.</p> <p>AFIT liaise with the Council’s other investigations teams (such as housing and parking) as well as collaborate with other investigators via the London Borough fraud investigators group.</p>			<ol style="list-style-type: none"><li>1. Camden has a zero-tolerance approach to fraud which is well publicised.</li><li>2. A robust anti-fraud and corruption strategy and whistleblowing policy is in place to ensure a structured approach to assessing referrals and progressing investigations.</li><li>3. A qualified investigations team is in place, the team pro-actively keep abreast of industry alerts.</li><li>4. A mandatory anti-fraud training module is in place. New employees are required to complete the fraud awareness module and existing employees are required to refresh training.</li><li>5. A well-resourced and qualified investigations team is in place, the team pro-actively keep abreast of industry alerts.</li><li>6. Fraud awareness workshops – tailored presentations and practical exercises for identified risk areas or provided on request.</li><li>7. Regular AFIT (Audit Fraud and Investigation Team) meetings take place to review caseloads and lines of enquiry on an ongoing basis.</li><li>8. 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>9. The Internal Audit team continue to alert AFIT should any potential fraud risks be flagged during audit investigations.</li><li>10. The Council's Audit and Corporate Governance Committee receive an annual update detailing the outcome of investigative activity including whistleblowing investigations.</li></ol>			
Actions			Action owner	Status	Due Date	Risk sponsor
Continue to engage in the National Fraud Initiative			Nasreen Khan	In progress	October 2027	K. Myers / H. Mohamed