

Appendix 2 Risk Detail Report Part A Risks

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CDS0035 Golland, Paul	A lack of (and risk of losing) application engineers reduces our ability to support critical IT systems.	Line of business systems which are relied on by front-line services are unsupported leading to key processes not being able to function, or statutory services being reduced or prevented altogether. Significant challenge of IT department being able to continue to support key systems.	Golland, Paul Last Review: 19/04/2024 Last Amended : 28/06/2024 13:30:14	5	5	25	5	4	20

Existing Controls

- Cloud first architectural principle for all new applications -reduces the support complexity and ensures supplier supports most of the infrastructure needed by the application
- Digital Internal Control Board setup so there is a forum to discuss governance and continuity at a strategic level -
- Evidence that steps in the agreed implementation plan are progressing successfully -
- Review of loss of technology under review by Business Continuity Team following Capita print server incident . -
- TUPE'd the Application Management Support team back into IT from Capita -(after unsuccessful outsourced experience which saw support capacity reduce and substantial knowledge loss which hasn't been replaced)

Future Controls

- CDS Restructure Implementation Date: 31/08/2024
- Discussions with suppliers of these systems around how they could support us if needed CDS capability review commissioned to define support target operating model including role of suppliers 30/06/2024
- Ongoing Target
- Document and agree a resource plan (recruitment, training, cross-skilling, etc.) CDS capability review commissioned to define support target operating model including resource plan to fill any gap identified 30/08/2024
- Ongoing
- Proposed systems dashboard highlighting at risk systems produced and discussed at Digital Control Board (JM) Paper approved by Digital Control Board - Systems Governance sub-group to be formed who will finalise dashboard format and oversee its completion and upkeep. 31/08/2024
- Progressing but not complete.
- Review apprenticeship options CDS capability review commissioned to define support target operating model incl. apprenticeships 30/08/2024
- Part of capability review Target
- Review support profile of each system to identify skills and resources needed to support each (skills matrix) (JM) CDS capability review commissioned to define support target operating model including skills and resourcing 30/06/2024
- Part of capability review
- Secure funding (if required) to implement resource plan CDS capability review funded from transformation - discussions with finance on converting capital to revenue - target operating model will clarify cost basis for the services provided 30/08/2024
- Part of capability review
- System roadmaps of impacted systems documented, highlighting opportunities to mitigate risk through procurement, rationalisation Paper approved by Digital Control Board - Systems Governance sub-group to be formed who will oversee roadmap standards - creation of initial roadmaps to the agreed standards to follow. 31/07/2024
- Ongoing

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CDS0043 Golland, Paul	The proposed PSTN network (public switched telephone network) leads to a range of service disruption and could place vulnerable individuals and council assets at risk if no operational service is in place.	In practice, this could mean that tower blocks are left with faulty lifts or unsecure entry systems; vulnerable telecare users could be left without help in an emergency, and traffic could come to a standstill. Service disruptions could also result in high costs, with expensive emergency repairs being carried out to retrospectively rectify issues. There is also a trading standards issue of retailing products that will become obsolete without notice. Fixed lines will be unavailable full impact currently unknown and needs to be investigated as will have an impact to vulnerable individuals, council housing, alarm systems and elevators may all stop working. Until we have assessed our services for this impact we cannot tell what the full impact will be.	Golland, Paul Last Review: 27/06/2024 Last Amended : 28/06/2024 12:09:09	5	5	25	5	5	25

Existing Controls

- small project team established -Small project team formed within CDS to agree 3rd party supplier, oversee their work and ensure they have the tools they require from LBC to access buildings (for example).
- Engaging with service areas e.g. careline and ensure contacts are up to date
- Raise awareness of impact through comms (internal and external)
- Working with LOT1 and SLP
- Third party resource appointed to audit the Council's estate. -

Future Controls

- Audit of assets to be completed September 2024 and action plan to be prepared

Implementation Date:

02/09/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
FIR0065 Bannin, Allister	The Council does not achieve financial sustainability due to historic borrowing totaling £1.6 billion and the costs of servicing that debt (24/25 - £66 Million) and remains reliant on annual extraordinary central government support.	<ul style="list-style-type: none"> Do not meet terms and conditions set out by DLUHC in Capitalisation Direction Agreements. Inappropriate financial behaviour and practice. Political scrutiny applied at local and national level. Media interest and scrutiny at local and national level. Impact on reserves Further S114 notices in future Reputational damage. Not balancing 25/26 financial year and future years Increasing MRP and interest annual costs require further savings /reduced services 	Bannin, Allister Last Review: 31/03/2024 Last Amended : 04/07/2024 18:36:12	5	5	25	5	5	25

Existing Controls

- Financial assurance review meetings monthly -Each directorate management team meets with the Chief Executive and the S151 Officer monthly to review their overall financial position , current and future. This year, the capital programme will also be reviewed plus directorate risks and performance monitoring
- Oversight by DLUHC Improvement & Assurance Panel. -
- Public consultation activity -The next public engagement exercise is due to start in November. Preparations are underway and a timetable is being drafted. The timing of the Scrutiny and Overview Committee and its sub-committees will be discussed with the Chair in the early autumn.
- Star Chamber process to review all savings and cross council savings involving IAP -

Future Controls	Implementation Date:
- Budget Working Group in place to programme manage the MTFS and budget setting process The Budget Working Group for 2024-25 will recommence in July 2024 focusing on the October 2024 MTFS Update and March 2025 Budget Setting Processes.	14/03/2025
- Proposed financial sustainability plan being worked through with DLUHC	14/03/2025
- Work being undertaken with the Department for Levelling Up, Housing and Communities to balance future year budgets Fortnightly meetings are timetabled with DLUHC officers to review progress	14/03/2025
Workshops on asset sales to be held over the summer with DLUHC officers who are in discussion with Treasury officers	
DLUHC are aware of the timetable of the October 2024 MTFS report and the February/March 2025 Council Tax papers	
....	

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PR0049 Agbakiaka, Karen	SEND Transport - Budget allocation for SEN Transport is insufficient to meet the demand for EHCP	a. Overspend/pressure on budget. b. Statutory duty to provide travel assistance. c. Political and media interest. d. Legal challenge. e. Parent and child complaints due to level of service	Agbakiaka, Karen Last Review: 20/06/2024 Last Amended : 04/07/2024 14:15:44	5	5	25	4	5	20

Existing Controls

- Consideration of demand and review of travel assistance offer -
 - Regular communication and alignment with SEN department - CMT level discussions on how to manage demand and associated costs .
- Budget allocation discussions.
- Review of Education Resource Panel (ERP) in relation to travel assistance -
 - SCRER representative to be involved in all assessment panels for EHCPs and School placements -

Future Controls

- Continue to work with schools ensuring SEN transport is considered in any decisions
- Independent Travel training review Review the existing provision with a view increasing uptake of independent travel
- Review of transfer of budget to CYPE and Client commissioning relation budget to sit where demand driver are
- Transformation phase 2 review Review of recommendations in phase 2 transformation review. to determine potential saving/ efficiencies

Implementation Date:

- 01/10/2024
- 19/07/2024
- 13/09/2024
- 13/09/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
ASC0034 Robson, Simon	Occupational Therapy waiting lists growing beyond service capability . This is a national issue.	- Clients waiting an unacceptable length of time for statutory occupational therapy assessments/equipment. - Clients at risk as a result of the above e.g. slips, trips and falls as well as lower day to day quality of life re mobilising and activities of daily living, i.e. cooking, personal care. - Increased domiciliary spend (as a result of clients not having equipment). - Increased enquiries from residents regarding waiting times for OT assessments.	Robson, Simon Last Review: 25/06/2024 Last Amended : 08/07/2024 09:45:34	4	5	20	4	2	8

Existing Controls

- Additional capacity being recruited - Short term project with OT and Adult Support Team to look at managing demand at Front Door MAU post was recruited to.

- Backlog management -Business Case for engagement of Delivery Partner approved and procurement underway. Protocols & procedures have been reviewed within ACOT to ensure maximum efficiency . Screening and Triaging to minimise the numbers of assessments on the waiting lists .

- OT pathway has been mapped, improvements identified; the managing demand portal has now gone live -There is still ongoing work under the Frontrunner Programme to identify referral pathways into community therapies and ACOT.
Funding secured for a delivery partner.

Delivery partner has been invited to look at the operating model.

Future Controls

- Additional Measure details below:-
- Ongoing recruitment and looking at the trusted assessor model is planned for across 2024.
- Recruitment of OT staff is a national issue.

Implementation Date:

30/06/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
ASC0043 Robson, Simon	<p>Croydon Council are currently in a Section 75 partnership with SLaM to deliver an Integrated Adults Mental Health Service. Current risk identified- Potential breach of local authority Care Act Statutory responsibilities .</p> <p>This is due to lack of evidence currently available from SLaM of adult social care interventions. (Please note linked to risk ASC0033 regarding AMP service).</p> <p>This is placing increased pressure on alternative social work teams and there is a risk that interventions may not be taking place in a timely manner. Alternative routes to support individuals could also be more costly placing pressure on existing budgets.</p>	<p>Non compliance with Care Act statutory requirements Reputational risk Vulnerable residents not receiving interventions or assessment they are entitled to Increased costs and resources</p>	<p>Robson, Simon</p> <p>Last Review: 25/06/2024 Last Amended : 08/07/2024 09:47:30</p>	4	5	20	4	2	8

Existing Controls

- Adult Mental Health Social Care Partnership Review by social care and health collaborative. -- Provide an overall as is position of current Croydon MH offer .
- Recommendations on the most effective delivery model of MH social care to promote effective partnership working and outcomes for people .
- Development of a MH social care transformation plan to promote statutory compliance and early intervention.
- Adult Mental Health Social Care Placement and Reviews Plan in place - To improve Adult Social Care statutory functions in terms of assessments , reviews, placements and packages of care.
- Croydon Adult Mental Health Social Care Quality Assurance Plan/Mental Health Monthly Performance Framework: -Developed to implement, monitor and evaluate Adult Social Care interventions in Adult Integrated Mental Health Service – in progress.

Fortnightly meetings in place, action tracker drafted. (Document available if required).

- Mental Health Social Care Partnership Review with Delivery Partner -Delivery Partner secured to undertake deep dive diagnostic and develop programme to redesign in partnership with other strategic agencies, in the local health and social care system, the mental health operating model.
- Partnership Governance -Partnership governance arrangements in place to oversee diagnostic and operating model redesign.

Future Controls **Implementation Date:**

-

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
ASCI0022 Byrne, Bianca	The quality of data, performance recording and insight impacts on operational and strategic oversight and service delivery. Failure to produce robust data for assurance purposes and for the inspection.	Poor outcome from CQC assurance leading to directorate and council-wide reputational damage. Inability to direct resources effectively to meet business need. Inability to effectively forecast demand management and align allocation of resources to meet business need. Inability to effectively manage staffing caseloads. Inability to deliver accurate national data sets. Inability to deliver accurate data to strategic partners.	Byrne, Bianca Last Review: 25/06/2024 Last Amended : 25/06/2024 08:48:00	4	5	20	4	4	16

Existing Controls

- Annual performance update to Scrutiny Health and Social Care Sub-Committee -Following publication of the 2023 Use of Resources report (Nov 2023) and the ASCOF report (Dec 2023) aligned with the performance targets set out in the Exit Strategy and Mayor's Business Plan, the Directorate will showcase to Scrutiny it's current performance position and relevant action plans where improvement is required.

This was completed in January 24.

Next update will be Jan 25.

- Change Control Panel in place -Panel ToR have been reviewed and updated to make more robust.

Chairing of Board now the responsibility of the Directorate

Meetings held 4 weekly.

Planning meetings held in preparation for Panel meetings Chair and lead from DST.

Review of all change requests must be managed by quorate group within the Panel

Panel responsibilities to be included in the data management data quality frame work.

- Children and Adult Systems Board -A revised Board established and Director led.

Focus will be on strategic approaches to systems development and support with membership from CDS, CYPE, ASCH and (to be confirmed) Performance.

Meeting dates set first one 23rd July.

- CQC Data Management data quality working group -Receives delegated actions tasks from Performance Board.

Is responsible for delivering the new approach to reporting through Power BI and move away from Business Objects reporting

Membership covers Systems, Performance, Finance, Operations and informs the L&D requirements for the Directorate.

- Data cleansing project underway -Funding for dedicated Data Cleansing Officers has been secured and recruitment is currently underway .

LAS Refresh training underway from Feb 24 will provide greater understanding and knowledge of the system with a primary aim of improving data being input increasing quality moving forward.

Data cleansers interviewed, posts offered. Staff now in post.

- Data preparation for Inspection -• Availability of established suite of performance reports

- Data workstream established – to use reports to monitor data quality and performance

- Report aligning to assurance framework themes is being produced – Performance presents at Assurance Board as standing agenda item

- Plans to understand and use LG Inform data set

- Data review through monthly Performance Board -A revised Board forward plan is focused on preparation for statutory returns , monthly reporting of the Mayor's KPIs, the quarterly submission of the new client level data return. The Board also monitors related data and improvement performance plans.

- Development of reporting BI Dashboards with Performance team to support all levels of staff -Data management and data quality working group established. Performance Board has signed off priority list of dashboards for the group to deliver.

Performance Board have signed off 3 dashboards (Care Act Assessments, Occupational Therapy, Reviews)

Next phase of dashboards being developed - Safeguarding and Deprivation of Liberties. Sept 24

- Escalation of continued data management & data quality risk to CMT -As part of the Peer Challenge update paper key highlights from the reports picked out improvements required in both data management (CDS) and data quality (Corporate Performance), skills knowledge on both including maturity of skills and knowledge. There will be 2 workshops between the directorate and CDS and Corp Performance to resolve the issues highlighted.

- Escalation of continued data management & data quality risk to CMT -As part of the Peer Challenge update paper key highlights from the reports picked out improvements required in both data management (CDS) and data quality (Corporate Performance), skills knowledge on both including maturity of skills and knowledge. There will be 2 workshops between the directorate and CDS and Corp Performance to resolve the issues highlighted.

- Escalation of continued data management & data quality risk to CMT -As part of the Peer Challenge update paper key highlights from the reports picked out improvements required in both data management (CDS) and data quality (Corporate Performance), skills knowledge on both including maturity of skills and knowledge. There will be 2 workshops between the directorate and CDS and Corp Performance to resolve the issues highlighted.

- Escalation of continued data management & data quality risk to CMT -As part of the Peer Challenge update paper key highlights from the reports picked out improvements required in both data management (CDS) and data quality (Corporate Performance), skills knowledge on both including maturity of skills and knowledge. There will be 2 workshops between the directorate and CDS and Corp Performance to resolve the issues highlighted.

- Escalation of continued data management & data quality risk to CMT -As part of the Peer Challenge update paper key highlights from the reports picked out improvements required in both data management (CDS) and data quality (Corporate Performance), skills knowledge on both including maturity of skills and knowledge. There will be 2 workshops between the directorate and CDS and Corp Performance to resolve the issues highlighted.

- Escalation of continued data management & data quality risk to CMT -As part of the Peer Challenge update paper key highlights from the reports picked out improvements required in both data management (CDS) and data quality (Corporate Performance), skills knowledge on both including maturity of skills and knowledge. There will be 2 workshops between the directorate and CDS and Corp Performance to resolve the issues highlighted.

- Principal Social Worker and Head of Service Action Plan -To improve quality of recording consistency of data capture , monitored through supervision.

Series of meetings with HoS in the diary to review issues and areas around data cleansing.

Identification of issues and associated mitigations and target dates for completion.

Tracking of data cleansing performance.

- To finalise a systems and performance framework and governance structure for the directorate . -Framework requires the finalisation of the CDS systems support paper due to digital ICB April 24. It also requires an understanding from the Corporate BI project on the performance offer to Directorates . ASCH has a draft paper setting out its requirements from both CDS and Corp BI.

- Weekly task tray review in place -Data Cleansers have been in post from May and now take lead on monitoring and supporting managers to highlight outstanding tasks.

Data Cleansers now in post and working through the overdue tasks.

Future Controls

- Adult Strategic Systems Service Manager to be appointed April 24 - DMT agreed with CDS Head of Service to pursue recruiting a Systems Development Manager who will focus solely on Adult Social Care.

Implementation Date:

30/09/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CEHR0071 Shoesmith, Dean	Organisational behaviours, culture and practices lead to the Council being unable to operate effectively and therefore not serve the residents of the borough and internally within the council in accordance with their expectations.	<ul style="list-style-type: none"> Increasing and uncontrollable financial loss. Legislative action due to non-compliance with statutory obligations. Workforce behaviours critically damage the organisation. Political scrutiny and interest at local and national level. Media interest at local and national level. Staff morale. Continuing and increasing reputational damage. Government intervention. Employment tribunals and potential for litigation HR process Recruitment and retention of staff 	Shoesmith, Dean Last Review: 22/05/2024 Last Amended : 27/06/2024 13:35:03	5	4	20	5	3	15

Existing Controls

- People and Cultural Transformation Strategy -We have developed a co-creation approach to the design and implementation of the People and Cultural Transformation Strategy ensuring the voice of employees and their lived experience has helped shaped the development of the strategy and associated actions. It also aims to reflect the experience of residents in the council's delivery of services .
- Workforce culture and compliance -Work has been completed with Investors in People (IIP) for a staff survey aiming to improve culture , engagement and leadership across the council.

Work has been commissioned with Mazars to complete a culture audit on compliance within the council , using focus groups and a compliance audit model that will support the council with wider culture change and transformation.

Future Controls

- Cultural Compliance Audit and review and staff survey The outcomes from the Mazars culture review on compliance will also be inter -dependent with the IIP staff survey results and action plans ensuring congruence with the two and resulting actions.
- Staff engagement Focus groups are being arranged to review employee engagement from the staff survey results and further co -creation work will undertaken to ensure a clear action plan for development is developed and implemented.

Boston Consulting Group will be undertaking a further pulse survey on the work staff do and where improvements can be made as part of the development of the Target Operating Model to ensure workforce culture is factored into the development of the target operating model.

Implementation Date:

31/07/2024

01/10/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
EHSCSC0017 Madden, Roisin	Risk of high caseloads to the quality of provision for children & families and the recruitment & retention in Family Assessment & Social Work with Families services.	Caseloads above acceptable levels reducing the quality and timeliness of social work assessments and interventions; increased demand on statutory services through either repeat assessments or the need to intervene through a child in need or child protection plan. Rising costs as more complex interventions are required for children and increased demand on services. Impact on retention of social workers as staff reference workload as reasons for leaving Croydon. Ofsted evaluation of practice impacting on the reputation of the council, impacting on retention and recruitment.	Madden, Roisin Last Review: 04/07/2024 Last Amended : 04/07/2024 17:38:38	4	5	20	4	4	16

Existing Controls

- Establishment increased by 1 SW Team in FAS and 1 in SWWF -Permanent increase in the staffing establishment of the Family Assessment Service and the Social Work with Families Service in response to increased demand for statutory services from Croydon Children's Social Care
- Implement new duty system to change the flow of incoming work -Changing the pattern of allocating work from eight weekly to 4 weekly to allow more even spread of new work providing a graduated caseload of potential maximum end dates for assessments. This aids the effectiveness of assessment and intervention during the assessment period .
- Practice Improvement Consultant capacity for Family Assessment Service -A dedicated Practice Improvement Consultant has been recruited for the service to address the issues with the quality of social work practice arising from and contributing to rising caseloads in the service. This capacity will strengthen the confidence of practice ensuring that thresholds are applied appropriately ensuring that the right services are provided to the right children at the right time. Caseloads will gradually reduce to an acceptable level over the next six months.
- Procurement of an 'Outside London Pledge' team of agency workers -The procurement of a team of social workers, outside the Memorandum of Understanding as a last resort in light of the lack of agency staff available through the MOU London Pledge and standard Adecco framework . This has been enacted as of 1st August to provide additional capacity in Social Work with Families
- Recruitment of additional locum staff to cover absences due to vacancies and the increase in demand -Spend Control panel agreement has been given on a case by case basis for additional staff both qualified social workers, family support workers and additional SW Managers to be brought in via the agency framework to address gaps caused by sickness absence.
- Team Manager Practice Development workshops -Provide focused practice development workshops led by the Improvement Consultant to improve the quality of management oversight of children's needs in the service

Future Controls

- Development of MASH Dashboard in Power BI Enabling real time analysis of workflow in the Multi Agency Safeguarding Hub will support more effective application of resource to respond to requests for help from Children's Social Care, directing help from the partnership and thereby managing the demand on case- holding practitioners in the Family Assessment Service.
- Implement closer working between Family Assessment Teams and the Family Solutions Service The Family Solutions Service works with targeted early help interventions and these services can be provided to families within the assessment period, a change in the model of work is required for this to occur. The model of co-working needs to be developed and implemented during June & July 2024.

Implementation Date:

01/08/2024

31/07/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
FIR0063 Bannin, Allister	General increasing demand for council services driven by several factors, including declining health in the borough, neighbouring boroughs placing vulnerable families in the borough, legislation changes and cost of living pressures, increasing the financial demand on the council for services.	Service, financial, reputational, legal and people dimensions to the risk.	Bannin, Allister Last Review: 16/04/2024 Last Amended : 04/07/2024 17:48:54	4	5	20	4	5	20

Existing Controls

- Current control measures support to the community: -
 - Council tax support scheme supports low-income households, freedom pass provision and free school meals.
 - Council tax hardship fund was set up to support residents with the extra 10% Council Tax rise in 2023/24
 - Discretionary Housing Payments to contribute to shortfalls in rent.
 - Croydon Healthy Home service gives energy advice and supports fuel poor and vulnerable households to obtain funding for energy efficiency improvements .
 - Commissioning of advice services to provide welfare rights advice.
 - Downloadable directory for local support around welfare rights or debt advice
 - Croydon Works jobs brokerage service for residents and local employers .
 - Croydon Adult Learning and Training, and work through Skills and Employment Forum with college and universities, private sector provider and users to support the employability of residents.
 - Signposting residents to support with emergency provisions around food and utility top-ups.

Future Controls

- Lobbying of other Councils and Government Departments about impact of their actions
- Preventative and transformative improvements to service delivery and efficiency .
- Increased focus on prevention to reduce demand for longer term and more expensive services.
- Delivery of Future Croydon Transformation Plan to become the most efficient and effective Council in London .

Implementation Date:

01/10/2024
31/03/2025

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
FIR0067 Bannin, Allister	Delays in the external audits of the 2020-21, 2021-22 and now 2022-23 accounts could be masking errors in the accounts and therefore the current financial position of the Council is not certain.	<p>Work has been completed in relation to the accounting treatment of Croydon Affordable Homes and Croydon Affordable Tenures, corrections to HRA recharges from the General Fund and a necessary increase in the Provision for Bad Debt in relation to the 2019-20 accounts. The updated 2019-20 accounts are on the Council's website and have been shared with the Audit and Governance Committee. The 2019-20 accounts balance with a zero General Fund Reserve. The external auditors, Grant Thornton, have recently issued their Audit Findings Report for 2019-20 in which they reported a Disclaimed Opinion to the Audit and Governance Committee on 14 March 2024 due to the Kroll report still being reviewed by the police. The negative Direct Schools Grant reserve should be eliminated by additional grant from the Department for Education and Skills through the Safety Valve process. The grant will be phased in as the Special Educational Needs agreed Safety Valve plan is delivered. A related risk is that the government's response to national delays in external audit work curtails the opportunity to fully complete the external audit work required by imposing a backstop date beyond which no further audit work can be executed. The government recently consulted on a potential backstop date of 30 September 2024 which would mean that as a minimum the 2021-22 and 2022-23 accounts would not be audited.</p> <ul style="list-style-type: none"> • Potentially qualified accounts provided in respect of 2020-21, 2021-22 and 2022-23 • Loss of control of financial position • Political scrutiny applied at local and national level. • Media interest and scrutiny at local and national level. • Continuing financial losses. • Reputational damage and loss of trust from Croydon residents • Potential investigation of historic financial practices. • Impact on reserves • Continuation of Disclaimed Opinions to the accounts 	Bannin, Allister Last Review: 31/03/2024 Last Amended : 04/07/2024 17:50:02	4	5	20	3	4	12

Existing Controls

- Regular meetings with Grant Thornton and corporate finance team to monitor progress of audit -response to backstop consultation was to request an exemption from the backstop arrangements.

Future Controls

- Monitor the government's response to the national delays in external audit and lobby to allow completion of Croydon's audit

Implementation Date:

31/03/2025

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HAS0007 Cingtho-Taylor, Beatrice	Lack of supply of affordable accommodation to meet homelessness demand .	<ul style="list-style-type: none"> • Additional cost to General Fund due to increased spending on commercial hotels and temporary accommodation. • Households potentially living in unsuitable accommodation with consequent negative impacts on their health and wellbeing. • Breach of statutory obligations regarding use of shared Bed and Breakfast accommodation by families for more than six weeks. • Legal action against Council not meeting accommodation needs of homeless people. • Financial compensation imposed by the Housing & Local Government Ombudsman for not meeting accommodation needs. • Increased use of nightly paid temporary accommodation which is more expensive. • Negative publicity. 	Cingtho-Taylor, Beatrice Last Review: 25/06/2024 Last Amended : 08/07/2024 13:55:35	5	4	20	5	4	20

Existing Controls	Implementation Date:
<ul style="list-style-type: none"> - Additional Funding - Use of Homelessness Prevention Grant -Grant allocation of £7,382,746 for 2023/24 and £7,449,781 for 2024/25 have been confirmed and supported by a statutorily required Homelessness Strategy Monthly meetings with DLUHC Advisers is held to review demand pressures and our response which can inform future grant allocations . - Close monthly monitoring of In Year spend to achieve a balanced budget -This includes reviewing the impact of demand and supply to ensure corrective action is taken to reduce spend. - Collaboration at Sub-regional and Pan London levels -Sign up to nightly paid temporary accommodation agreements through London Councils to reduce impact of rent rises by other boroughs placing within Croydon. Monitor placements by other London boroughs into Croydon and exert pressure through Pan London network and/or direct communication to reduce or stop the placements. - Continual review of financial incentives to private landlords. - A review of financial incentives to respond to property market conditions to ensure access to supply of private rented sector accommodation . - Council sourcing right accommodation at the right price, right size and right quality from within the local Croydon Market - A Scheme Risk Appraisal Panel has been set up to oversee the Housing supply programme and the Council is currently engaging with various investors and developers to secure affordable housing supply . - Development & publication of Homelessness and Rough Sleeping Strategy. -Following a comprehensive review of homelessness in the borough, the strategy will set out the strategic direction for service delivery in 2024-27. The strategy seeks to set out a collaborative approach to tackling homelessness in Croydon. An early help approach has been shown to prevent homelessness and will be the foundation of the strategy. This has been approved by Cabinet in April 24, pending final Full Council approval in July 24. - Lack of supply -Purchase of BBB properties, Lion Green Rd and Red Clover Gardens - Make best use of available accommodation through creating churn -Reduce void turnaround for council properties and maximise access to properties from Registered Providers through nomination rights - regular meetings with RSL's reinstated - Securing longer use of Council hostel accommodation -Leases have been re-gearred to ensure longevity of Council use at a more economically viable rate incorporating more favourable terms and conditions. 	
Future Controls <ul style="list-style-type: none"> - Continue to engage with various investors and developers to secure affordable housing supply . 	01/08/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HAS0022 Cingtho-Taylor, Beatrice	Published Homelessness & Rough Sleeper Strategy	Breach of statutory requirements to have a published strategy Financial risk to the homelessness prevention grant from Government (circa £7m per year) if no published strategy Reputational risk to both council and key statutory partners Lack of transparency to residents in how homelessness services are delivered	Cingtho-Taylor, Beatrice Last Review: Last Amended : 08/07/2024 13:39:33	4	5	20	4	4	16

Existing Controls

- Draft Homelessness & Rough Sleeping 2024-2029 strategy approved by Cabinet. -

Future Controls

- Homelessness Strategy 2024-2029 to be considered and approved by full Council. Briefings with scrutiny.

Implementation Date:
01/10/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
TRA0007 Sharon Godman	Financial resources may not be sufficient to deliver transformation ambitions	Delay to or compromise in the delivery/timing/quality of the Mayor's Business Plan objectives; IAP Exit Strategy and/or MTFS savings	Godman, Sharon Last Review: Last Amended : 26/06/2024 08:29:09	4	5	20	4	4	16

Existing Controls

- MTFS has £5m annual budget for transformation -

Future Controls

- Additional one -off resources to be identified following 2023/24 accounts closure

- Review of 2023/24 project and programme spend to identify potential claw back Improvement portfolio lead has been commissioned to carry out the review, liaise with directorate portfolio leads and report back early July 24

Implementation Date:
31/07/2024
31/07/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
VRN0057 Aspinall, Kristian	The Council fails to plan for / provide a Designated Disaster Mortuary on behalf of the Senior Coroner, in the event of a mass casualty event in south-west London.	Failure to meet statutory duties Failure to manage emergency incident Reputational impact Emotional distress to communities and families	Aspinall, Kristian Last Review: 04/07/2024 Last Amended : 04/07/2024 17:00:25	5	4	20	5	1	5

Existing Controls

- Interim cover through borough funeral directors & hospitals -Review and confirm interim arrangements with borough hospitals and local funeral directors in the event of a DDM requirement before project group finished.
- Recommendation report to CMT in June 2024 -Project outline agreed at ICB Resilience, with lead and support outlined.
- Regular engagement with Senior Coroner -
- scoping DDM arrangements with other boroughs who have established DDMs to identify good practice and adopt in Croydon -

Future Controls

- Identify and agree funding for commissioned cover Identify budget to cover costs of DDM provision identified through project group,
- Identify contractor through project group Following review of options in the project group, commission contracted provider to provide cover.
- Implementation of DDM arrangements Implementation of contracted provider
- Task and finish group to be established Following agreement on project governance , task and finish group to be established to deliver on project, including budget outline to be presented to CMT. To be completed by September 2024.

Implementation Date:

30/10/2024
30/08/2024
28/11/2024
01/07/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
ASC0016 Robson, Simon	Social Care Funding and pathway for eligible 'Continuing Health Care' and 'Joint Funding' demand led pressures increases significantly the financial commitment that the Council must provide without additional contributions from our health partners. **negotiation and involvement with partner organisations to facilitate appropriate division of funding pathways accountability**.	<ul style="list-style-type: none"> The Council retains the cost of care that should be either fully or joint funded by NHS / CCG. Service and budget pressures due to national and regional agreed protocols and frameworks not being adhered to by our partners. Significant financial implications for the Council. Clients left without appropriately funded care and expert health input. Clients having to make contributions towards cost of care when they are entitled to NHS funded care. 	Robson, Simon Last Review: 25/06/2024 Last Amended : 29/06/2024 10:38:37	4	4	16	4	3	12

Existing Controls

- Consultant social worker completed review of CHC policy linked to practice. - Training being rolled out across teams. Escalation process implemented where initial DST rejected but considered by the service eligible . Target date 1/4/23
- Dedicated staff time to track CHC payments and provide consistent Council presence at CHC . -commenced with the involvement of the council staff including Key Officers in the NHS from the health sector . This involves both adults and children sectors and the Chief Executive Officer from the acute trust .
- Implementation and review of protocols and agreements for Children and young Adults . -
- Multi agency group refreshing and updating local system S117 protocol. -
- Overarching protocol and agreement in operation with Council attendance at CHC panels. -All partners must adhere to agreed protocols, timeframes and dispute resolutions.
- Transformation bid for dedicated project support -Transformation bid presented to the S151 officer for more effective coordination of the directorate's capacity and capability to improve CHC performance.
- Working with South West London Partnership (5 borough's) CCG in order to develop standardised protocols and policies. -

Future Controls **Implementation Date:**

- SW London ICB system wide review and transformation of CHC eligibility decisions and approvals and Director of Operations LA representative on the steering group . 21/08/2023

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
ASC0040 Robson, Simon	<p>Careium service: There has been a category of risks with Careium not following procedures and failing to alert Careline as per procedure.</p> <p>Call handling quality has been an ongoing issue, presenting a risk to residents not getting the appropriate first response. To add context, 4 complaints were received in January 2023, 1 complaint in February 2023 and 2 recorded in the month of March 2023, 1 complaint in April 2023 and 4 complaints in May 2023. The trend in complaints previously average 2-3 per month around delayed response or call handling quality. There were no complaints June 2023, July 2023 and to date. Due to the nature of the service, revised impact is considered medium. There are plans in place to direct award the Telecare monitoring contract to gain consistency for future service delivery.</p> <p>Mobilisation meetings with new provider to prepare for provider switchover ongoing - weekly - no finalised date for switchover 26th March 24 SW review.</p>	Residents are impacted, not receiving the appropriate response. There is reputational damage and risk of legal action for the service provider and council.	Robson, Simon Last Review: 25/06/2024 Last Amended : 25/06/2024 19:40:40	4	4	16	4	2	8

Existing Controls

- All meetings monitoring performance and contribute to overall improvement plan. -
- Monthly Joint commissioning meetings -
- Monthly operational meetings -
- Weekly exceptions report. -

Future Controls

- Switch to new provider planned. Options for alternative providers explored. Given further incidents of poor performance direct award option preferred. Preferred new provider Appello service, TSA accredited. Mobilisation plans in development for exit strategy from Careium contract.

Implementation Date:
01/08/2024

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
ASC0041 Robson, Simon	Council is not able to meet the statutory requirement on DoLs assessments due to the volume of referrals and staffing ratio .	<p>In the period following the Supreme Court's judgement in 2014 that led to a ten-fold increase in the demand for DoLs authorisations there were a number of local authorities that were penalised with significant financial penalties by the courts for delays in their DoLs work. Others have received adverse findings from the Local Government Ombudsman. However, more recently the Courts and the Ombudsman have been more pragmatic, particularly where local authorities have been able to demonstrate they have been taking all reasonable efforts to mitigate the problem .</p> <p>Delays in our DoLs work can create risks to some of the most vulnerable people we work with. Many DoLs authorisations relate to situations that are straightforward, but some will relate to situations where there are contentious arrangements for care and treatment, or the person is facing significant risks and possibly some draconian measures are in place to manage those risks. In those situations, the DoLS regime plays a significant part in promoting the wellbeing and protecting the human rights of those people.</p>	Robson, Simon Last Review: 25/06/2024 Last Amended : 08/07/2024 08:15:48	4	4	16	2	3	6

Existing Controls

- A recovery plan regarding the waiting lists is in progress . -Detailed recovery plan to support monitoring progress and the reduction of the risk from amber to green status.
 - Ability to secure sufficient Sec 12 Drs -Corp Director approved engaging Sec 12 Drs via purchase order.
 - Linking with Advocacy for All -as we have streamlined the administrative process for referring DoLs applications for Independence.
- Measures we have taken to significantly reduce the waiting list for DoLs assessments and the subsequent authorisation decision.

Measures we have taken to achieve this include

- Screening all incoming requests for DoLs authorisation, using the ADASS screening tool, to ensure high risk situations are prioritised
- Reviewing our decision making about whether s12 Mental Health Act doctors fall within the scope of IR35. We have determined that they do not, which makes it more attractive for them to supply their services to us
- We have moved more of the DoLs process from manual systems to being done within LAS , which improves efficiency and makes for easier and more reliable production of management data - We have widened the pool of our staff who act as signatories for DoLs authorisations
- Resources have been increased for the assessment, planning and administration roles in our DoLs work
- Measures we have taken have significantly reduced the waiting list for DoLS assessments and the subsequent authorisation -Measures we have taken to achieve this include
- Screening all incoming requests for DoLs authorisation, using the ADASS screening tool, to ensure high risk situations are prioritised
- Reviewing our decision making about whether s12 Mental Health Act doctors fall within the scope of IR35. We have determined that they do not, which makes it more attractive for them to supply their services to us
- We have moved more of the DoLs process from manual systems to being done within LAS , which improves efficiency and makes for easier and more reliable production of management data
- We have widened the pool of our staff who act as signatories for DoLs authorisations
- Resources have been increased for the assessment, planning and administration roles in our DoLs work
- Offer of individual professional supervision to BIAs (by full time BIAs and DoLS team manager) -
- Peer supervision for BIAs -
- Quarterly Provider forums to keep the Managing authority Up to Date with the developments. -
- We have established an effective working relationship with our legal department . -

- We have strengthened the links with the Managing Authorities , we have registered as a stakeholder and have contributed to the -

Future Controls

Implementation Date:

- Improve the DoLS business process in LAS for more efficient way of recording the assessments to reduce report writing time for the Best Interest Assessors and also for accuracy of data management. (ongoing)
- We are focusing on increasing our capacity for completion of assessments by Best Interest Assessors . We are doing this by
- Continued development of the LAS system for DoLS including consideration of a portal for external assessment submissions and referrals
- To review the expectations around the proportionality of assessment .
- Reviewing whether external DoLS BIAs should fall within IR35
- Recruit a wider pool of external DoLS BIAs assessors
- Review the barriers to the social workers across the Directorate who have completed DoLS BIA training from completing DoLS assessments
- Complete the review of processes for BIA rota and allocation .

31/07/2024

30/09/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CDS0029 Golland, Paul	Delay in migration to the Synergy Education Management IT system .	<ul style="list-style-type: none"> Have to retain legacy Capita One system for longer, costing more and breaching tender regulations Cost of programme increases to support project resources for a longer period of time Takes longer to onboard the required resources to deliver the project due to extended internal checks and balances on spending confirmed budget Insufficient time to bring in suitable specialists/backfill officers to meet supplier dates Reduction in staff morale due to change fatigue and financial pressures We do not have the experienced in-house support staff resource to support business-as-usual across multiple systems and the migration so are reliant on appointing temporary project staff Education white paper recommendations not able to be implemented 	Golland, Paul Last Review: 27/06/2024 Last Amended : 28/06/2024 12:14:04	4	4	16	2	2	4

Existing Controls

- Project Governance model and senior stakeholder engagement in place. -

Future Controls	Implementation Date:
- Capita ONE system data retention review needed before system can be decommissioned	31/07/2024
- Clear direction on grant funding position to cover support costs confirmed	30/06/2024
- Document and agree support requirements for Orchestra module Linked to corporate initiative on systems governance (a sub-group reporting into Digital Control Board) & CDS capability review to define support target operating model	30/06/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CDS0047 Golland, Paul	The inability to compete with the market pay rates limits our ability to recruit and retain permanent digital staff.	Over reliance on agency/interim staff. Unstable workforce .	Golland, Paul Last Review: Last Amended : 28/06/2024 12:21:34	4	4	16	2	4	8

Existing Controls

- HR undertaking a review of the Council's market supplement policy. -

Future Controls

- CDS restructure to consider apprenticeships and career pathways.

Implementation Date:
31/08/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CEHR0076 Shoesmith, Dean	Potential deterioration in organisational resilience, high turnover and workforce sickness due to prolonged period of uncertainty and change	<ul style="list-style-type: none"> • Unable to provide appropriate resource to respond to statutory requirements. • Demoralised workforce leading to increased levels of absenteeism, resignations • Reputational damage through perception of poor employer status / inability to deliver key services etc. • Reduction in staff morale (longer working hours / continuous pressurised environment / lack of 121's / • Serious injury / death as staff make operational mistakes / judgements through mental and physical exhaustion. • Officers required to /or choosing to leave the organisation leading to significant gaps in divisional resilience /staff knowledge and expertise. • Financial loss. • Press / media interest and scrutiny. • Political scrutiny. • Industrial action. • Recruitment & retention generally across council 	Shoesmith, Dean Last Review: 02/04/2024 Last Amended : 04/07/2024 17:15:49	4	4	16	4	3	12

Existing Controls

- Additional resource -In Housing a specialist temporary team is being recruited to address the current trend of increasing sickness absence and tasked to reduce the number of cases and overall sickness rates and costs.
- Market supplements -Market supplements have been reviewed and increased in areas of key skills scarcity to ensure risk reduction of workforce instability, seeking to improve recruitment and retention.
- Metrics reporting -Regular workforce metrics dashboards are produced for each DMT monthly , as well as quarterly for Workforce and Equality Board . This helps to identify areas of risk and enable mitigating actions to be put in place.
- Sickness panels -Sickness panels are in place for each directorate to review sickness trends as well as individual cases of concern, where actions under the council's managing sickness absence policy is taken .
- Vacancy and turnover analysis -A vacancy and staff turnover analysis and action has been produced for Workforce and Equalities Board as well as the IAP . This seeks to identify key risks of high turnover and vacancy rates and mitigating actions to be taken.

Future Controls

- Business partnering development programme The HR&OD division is to undergo a CIPD business partnering development programme to ensure that all HR&OD colleagues are able to provide timely and accurate data, which is used intelligently and purposefully to address key workforce risks associated with sickness, vacancies and turnover. **Implementation Date:**
01/10/2024
- Reporting dashboards Sickness, vacancy and turnover rates will form new dashboards developed in Oracle to ensure all managers have real time data relating to their service area and can take timely actions (supported by HR) to address the issues. 31/12/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
ED0003 Davies, Shelley	Risk of an increasing number of Council maintained schools, including maintained nursery schools, moving into a financial deficit, which could affect provision and should the school close or academise the debt would fall to the Council. .	• Financial loss to LBC as the Council holds liability to settle deficit should schools transfer to academy status under a forced academy order or should a school close through consultation due to falling roll and as a result of surplus places review.	Davies, Shelley Last Review: 10/05/2024 Last Amended : 08/07/2024 16:19:12	4	4	16	3	4	12

Existing Controls

- 'Schools of concern' are under monthly review. -
- Deficit schools report financial outturn monthly to LBC. -
- Focus on schools with significantly reducing pupil numbers and therefore funding -School Place Planning working group
- Implementation of new strategies following -Independent Financial Review of 'Schools in Deficit' this includes visits to 'Schools in Deficit'
- Oversight of any significant deficit reporting as a result of C19 in place. -
- Proposed cabinet report July 2024 - outcome of the review of the MNS -
- Regular update meetings with the Governing Body's / SLT's of schools with the highest levels of debt. -
- Risk rating system is in place for each of the schools that are either in deficit or 'causing concern'. -
- Schools are met with by senior finance and education officers -to discuss their deficit and their action plan for setting a balanced budget in the future. This is key for any schools deciding to convert to academy status.
- Schools are requested to set a licence deficit plan – -this includes a 3 year budget plan as to how the school will return to a balanced position...
- We have input into the school's 3 year business plan to shape repayment terms and included a formal letter of agreement. - Termly finance meetings for all maintained schools sharing best practice etc .
- Where appropriate the Council is using its statutory powers to investigate installing an Interim Executive Board (IEB). - Powers are limited in terms of financial benefit to the LA but could steer the school towards a form of collaboration with another education body.

Future Controls

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

Implementation Date:

02/09/2024

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
EDCIP0003 Crichlow, Kerry	<p>Displaced People (Governance and Strategy).The cross-cutting nature of the potential impact and additional burden to the council in relation to asylum seekers and displaced people from Ukraine requires a whole council response and robust governance oversight.</p> <p>The acceleration of asylum claims to grant refugee status and remove housing support for asylum seekers and the ending of hosting arrangements under the Homes for Ukraine Scheme will place additional pressure on the Council's capacity to provide housing to vulnerable residents .</p>	<ul style="list-style-type: none"> - Increased demand on adults' and children's social care services, schools and local health provision - Increased demand for housing and an increase in homelessness - Increase in people with NRPF and destitute if asylum applications refused - Increase in social tensions, impact on community cohesion 	<p>Crichlow, Kerry</p> <p>Last Review: 25/06/2024 Last Amended : 26/06/2024 21:01:41</p>	4	4	16	4	3	12

Existing Controls

- Develop a cross borough approach to strengthen Croydon's ability to influence government policy with regard to Asylum Seekers . -- engage and lobby through London Councils meetings e.g. CELC, ALDCS and the Strategic Migration Partnership to set out Croydon's case.
- Establish a Multi-Agency Forum (MAF) around the Queens Road hotel -- Escalations from the monthly joint Safeguarding Assurance meeting and other partnership forums reported to the MAF for action by the Home Office and providers
- Establish a strategic programme board to strengthen cross-council and partner oversight of risks and mitigations -- Monthly Programme Board chaired by the Corporate Director CYPE and attended by all Corporate Directors, Director Public Health and senior leads from Croydon Place ICB
- Understanding of the additional financial burden to the Council and its partners -- establish common understanding of the data with regard to the additional financial burden and service delivery pressures
- monitor and report to the Strategic Programme Board
- Work across directorates to develop and implement priorities for HfU and Asylum Seekers Grant to prevent homelessness -- work closely with the homelessness prevention service to align prevention work for Ukrainian, Afghan and newly recognised refugees
- secure specialist capacity to provide housing options advice to newly-recognised refugees
- develop robust forecasting to ensure additional activity does not create a burden on the Council's general fund

Future Controls

- Develop an exit strategy to prepare for the closure of the 2 contingency hotels - test central government plans for Croydon's contingency hotels at every formal and informal opportunity
- work through London networks to learn from other boroughs' experience to inform local plans
- work closely with health partners and schools on transfer planning
- work closely with the Home Office and ClearSprings Ready Homes on transfer planning

Implementation Date:

31/07/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
EHCS0010 Madden, Roisin	Exploitation of young people in the Borough both criminal and sexual harms children and young people.	<ul style="list-style-type: none"> Children feeling and being unsafe; becoming victims and/or perpetrators of crime as a result of exploitation by adults. Significant risk of harm to young people in the Borough through exploitation (sexual and criminal), being missing, trafficked, caught up in criminal acts 	Madden, Roisin Last Review: 04/07/2024 Last Amended : 04/07/2024 17:42:47	4	4	16	4	4	16

Existing Controls

- Adolescent Support Team who work on statutory basis with adolescents at risk of exploitation -Where there is a risk outside of the home Young Croydon includes a specific team - the Adolescent Support Team as part of Children's Social Care to provide intensive intervention for children and their families to reduce risk and meet needs.
- Child Protection Investigations regarding Extra Familial Harm -The Council and partners apply the Pan London Child Protection procedures specifically recognising Extra Familial Harm, within the Child Protection Team a specific role leading on Extra Familial Harm has been created to advise children's services staff and multi agency teams where Extra Familial harm features in a child's life
- Focused work with our schools where there are concerns about exploitation - Within the Access to Education Service there are three teams of staff who work in and with Croydon schools to enable access to education , inclusion in education, preventing exclusion and suspension of children from school; address concerns about safeguarding within schools including using the ' Team around the School' approach, enable children & young people to move from NEET to EET; assess arrangements for children who are Electively Home Educated and respond to concerns about Children Missing Education. The Fair Access Panel and Missing Monday meetings are key multi agency panels focused on children who are at higher risk of exploitation. Snr staff from these teams attend the Complex Adolescent Panel.
- Introduction of Borough Wide Youth Safety Plan -The Youth Safety Delivery Plan will increase preventative, disruptive and responsive activities to reduce the prevalence of unsafe situations for young people in Croydon.
- Partnership working with the police and other agencies. -Working within 'Working Together' statutory guidance referrals for children where there are concerns about exploitation and / or being missing from home or care, are responded through within Croydon MASH leading to universal, targeted or statutory provision to reduce the risk and meet identified needs.
- Robust and reliable data as well as children's feedback to be analysed on a regular basis -(to include: increase in Return Home Interviews, less repeat missing children, realistic National Referral Mechanism (NRM) referral rate, realistic number of children tracked at risk of criminal and sexual exploitation and risks reducing).
- Robust and reliable data regarding children being missing & identified as at risk of exploitation is available - Data collection and analysis is a key role of Young Croydon, ensuring that practitioners know how to accurately record information, ensuring children who go missing are offered an Independent Return Home Interview and the information gained is analysed, cross referencing with information from Education, Police & Health Service information to identify areas of need and organise targeted disruption activities to reduce the risks to children and young people in Croydon.
- Serious Youth Violence statistics are produced monthly by the Violence Reduction Network. -These reports provide an overview of any increases / decreases in specific categories of youth violence activities to assist in the strategic approach taken by the Council.
- The Complex Adolescents Panel (CAP) is a weekly multi-agency panel following the MACE Protocol -This multi agency panel includes representatives from the police, health, Clinical Systemic Service, Housing, YOS, gangs, education, CVS partners.
- It is chaired by the Service Manager for Young Croydon. The panel oversees children who are being exposed to extra-familial harm such as going missing, being exploited.
- Social workers and team managers present cases and the panel share information and intelligence.
- Resources can be allocated and actions are agreed to manage the risk presented, this includes those of perpetrators.
- Croydon's MACE is incorporated into CAP and children who are being exploited are reviewed, dependent on level of risk ie high = monthly.
- This enables senior managers of all partner agencies to understand who are the most vulnerable children in the borough and the risks that they face. It enables management of those risks with multi-agency planning and reviewing.
- The Public Health Approach is applied within Council Services to reduce risk and harm - The Public Health Approach provides the framework to deliver the council's commitment to reducing violence, including serious youth violence and knife crime in the borough.

Future Controls

- Maintain above processes See above

Implementation Date:

11/07/2025

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
EHSC0019 Madden, Roisin	Housing options for care experienced young people are insufficient in quality and availability to meet the expected standards as set out in the statutory guidance for corporate parenting and as assessed through the Ofsted ILACS framework.	Care experienced young people are unable to live independently when they are ready to do so. Their independence is delayed through lack of availability of suitable housing pathways. Increased costs to the council through maintaining LA care placements beyond the time with the young adult needs them. Poor outcome in a regulatory inspection.	Madden, Roisin Last Review: 30/03/2024 Last Amended : 21/06/2024 12:33:48	4	4	16	4	4	16

Existing Controls

- Corporate Parenting Transformation Programme Housing workstream -The Housing workstream of the corporate parenting transformation program contains specific projects to improve the range and quality of housing pathways for care experienced young people, include the quality of response to housing needs, reduce the likelihood of care experienced young people facing homelessness.
- Create and implement joint housing/csc panel -Developing a panel of staff from Housing and Children Social Care to consider the housing needs of young people who are care experienced to ensure the right pathway to their achievement of stable safe homes is identified and delivered in line with the needs of the young person.
- Establish a Local House project in Croydon -A partnership with the House Project will be launched to support young people moving successfully into their stable long term home .

Future Controls	Implementation Date:
- Co-located Housing, Benefits and Support Team recruited, inducted. A co-located team of staff with expertise in Housing, Benefit entitlements and support to achieve and maintain safe independent living will be created to meet the needs of Croydon's Care Experienced young people.	31/07/2024
- Create and embed new housing pathways for CEYP Pathways to stable appropriate accommodation for Care Experienced young people need to be clear, accessible and fully understood by all concerned	31/12/2024
- Develop a joint DWP/Croydon Protocol Creating a clear protocol of work between Croydon Council and the Department of Work & Pensions is agreed and implemented to ensure care experienced young people have access to welfare benefits to support their independence, safety and wellbeing.	31/07/2024
- Develop and implement pre tenancy training and post tenancy agreement support and services To enable care experienced young people to manage a tenancy there needs to be accessible training provided before tenancies are provided, and post tenancy support services and plans.	31/07/2024
- Manage legacy temporary accommodation move on Joint work with Housing to identify the needs of care experienced young people who are living in short term accommodation provided by the council that is identified as temporary accommodation in housing legislation.	31/07/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HP0010 Hallett, Matthew	Impact of higher interest rates	The Council might have to borrow at higher rates. The Council might borrow without having the need to.	Hallett, Matthew Last Review: 16/05/2024 Last Amended : 29/06/2024 08:24:55	4	4	16	4	4	16

Existing Controls

- Asset sale programme -The Council is selling assets in order to reduce its debt.
- Capital Strategy and Programme -The Council has produced its future capital strategy and capital programme for 24/25 which will enable the Council to make more informed decisions about its need to borrow.
- Treasury Management Strategy published annually and reported on during year -

Future Controls

- Controls reviewed as part of the Council's financial management of the Capital programme and proposals for future asset sales.

Implementation Date:

30/09/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HSI0041 Hanlon, Sue	Serious maladministration findings linked to service failure for repairs, compliance and/or damp and mould cases could lead to 'deep dive' investigation by the Housing Ombudsman service.	Due to the higher profile of the Housing Ombudsman service over the last 3 years, more tenants are escalating complaints to there service for investigation. The Housing Ombudsman are finding more cases of serious maladministration and awarding higher sums of compensation, which leads to reputational damage and financial detriment for the organisation receiving the Order. If Croydon continue to receive maladministration findings, this could lead to the Housing Ombudsman using special measure and undertaking a deep dive into a service that they believe has systemic failures. A 'deep dive' will lead to Regulatory intervention, decrease the level of trust with our residents in respect of our Transformation Plan and reputational damage.	Hanlon, Sue Last Review: 09/05/2024 Last Amended : 02/07/2024 10:29:31	4	4	16	4	3	12

Existing Controls

- Regular analysis of disrepair cases -Analysis of the disrepair cases in the last year has led to change in our process and the introduction of KPIs, to reduce the number of cases of legal disrepair and undertake repairs via a voluntary undertaking which leads to a reduction in legal costs.
- Regular review of the management of damp and mould/disrepair cases -Monthly meeting in place Chaired by Director to review delivery of service, KPI's, complaints, risk management and budgets linked to this area.

Future Controls

- Use AI technology/devices to support us to identify properties at risk of damp and mould Pilot the use of devices across our stock to support us with the collection of data and targeted interventions/works to reduce damp and mould in homes **Implementation Date:** 01/09/2024
- Use existing data to identify blocks/properties more at risk of damp and mould Review data quarterly to identify trends/hot spots and arrange for inspectors to proactively visit properties in these areas. Compliment these visits with tenancy audits. 01/10/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PH0007 Fallon, Andrea	Cost of living pressures continue to widen health inequalities in both physical and mental ill health , making more people vulnerable, and increasing demand on all Council services.	<ul style="list-style-type: none"> • Increased mortality and morbidity in more vulnerable groups. • Adult Social Care pressure. - Children social care pressure • Housing demand. • Political and media interest. 	Fallon, Andrea Last Review: 24/06/2024 Last Amended : 27/06/2024 12:50:57	4	4	16	4	4	16

Existing Controls

- Health inequalities monitoring -There are a range of control measure for this risk not all within public health remit, or indeed, within Croydon council's remit. a key part of the role of public health in control measures is to identify where the inequalities are increasing, both in terms of age profile, geographic location, specific communities. There is also a role of identifying where some groups are disproportionately impacted by inequalities or their inequalities are increasing. Much of the data can be found in the JSMA/Croydon observatory.

The mitigation/control measures are around education, housing quality, employment opportunities, access to services, including health services.

There is also a regional and national dynamic to the control measures linked to policy ,funding- of the whole local system, both Local Authority and NHS and grant opportunity

Work within public health and partnership working to ensure vulnerable residents needs are met through commissioned services

Information shared in Health check messaging.

Future Controls

- No further/future controls identified at this time but to be reviewed

Implementation Date:
30/09/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PR0039 Agbakiaka, Karen	Deterioration of the highway network due to the deferral of the planned revenue budget of £1m as part of the MTFS, for 23/24 and 24/25.	Potential Increase in third party claims and due to the reduction in physical repair works to the council's highway assets. this includes but not limited to emergency response to deal with road traffic incidents, cyclical drainage maintenance, road repairs and winter maintenance activities.	Agbakiaka, Karen Last Review: 26/03/2024 Last Amended : 26/06/2024 11:55:20	4	4	16	3	3	9

Existing Controls

- Highways Asset Management Plan - safety inspections -The Council has an asset management plan in place which adopts a risk-based approach to undertaking safety inspections across the network.
- Safety inspections grade the highway and whether a reactive repair is necessary as well as a priority rating system.
- quality management systems -Review task orders being raise each month to ensure priority works are being undertaken in date order.
- Continuously review the inspection policy and adjust the frequency of inspections of identified high risk locations to ensure the deterioration is reviewed and escalated where necessary.

Future Controls

- Deterioration of the highway network A steady level of investment in our highways will allow better planning for the future . An annual review of the 'State of Croydon Highways' to check how well the council is progressing with reducing the rate of deterioration of its highway assets.

Implementation Date:
06/06/2025

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PR0043 Agbakiaka, Karen	Future waste collection & street cleansing contract costs increase above forecasted amount as a result of changes in market appetite to risk resulting in increase price for new service(2025 to 2033).	Financial - insufficient budget to cover the cost of service including both Capital and revenue. Reputational - Reduced service offer does not deliver required quality standards.	Agbakiaka, Karen Last Review: 26/03/2024 Last Amended : 24/06/2024 11:58:57	4	4	16	3	2	6

Existing Controls

- Competitive dialogue to continue fully supported by central finance in the analysis of all financial tenders. -
- re-procurement and evaluation methodology -- High weighting on financial assessment at 60%.
- two stage competitive dialogue process in progress, current indicative pricing received within affordability .

Future Controls

- Financial modelling Final service specification approved and all areas of service enhancements individual fully cost in order to asses financial impact of new service. Growth bid approved as part of the 2025 MTFS. Financial analysis being undertaken to access cost benefit of the cost of Capital provision for new operational vehicle. Full financial cost model will be presented as part of final tender broken down by service area.

Implementation Date:
13/09/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PST0009 Cheesbrough, Heather	The macro economic climate prevents the Council from delivering: <ul style="list-style-type: none"> the necessary support infrastructure; access to the appropriate employment skills base developed through the local workforce; the economic growth of businesses within the borough; and the continued development of the metropolitan centre. 	<ul style="list-style-type: none"> Significant loss of local employers if businesses collapse due to imminent recession and costs crisis. Severe increase in local unemployment Reduced employment opportunities for those furthest away from the workplace Not sufficiently nurturing small and medium businesses skills and upskilling and developing the breadth of skills of the local workforce. Severe damage to the local economy, difficulty in attracting new inward investment. Damage to the local economy, difficulty in attracting new inward investment. Loss of potential income to the Council from business rates. 	Cheesbrough, Heather Last Review: 26/06/2024 Last Amended : 04/07/2024 19:29:59	4	4	16	4	4	16

Existing Controls

- Assistance for local business through the development of business forums and BIDs. -
- Commission a Sectorial Analysis to better understand Croydon's economic base line offer , gaps and offer -Sectorial analysis will inform the Regeneration Strategy Commission and Inward Investment Plan
- Continue to develop the Croydon Works initiative to identify apprenticeships and employment opportunities for local residents . -
- Continued development of the discretionary fund to shape and support Croydon business recovery. -
- Coordinate with a Town Centre Vision and Croydon Town Centre Regeneration Strategy -The Economic Analysis and Investment Action Plan is a workstream that sits alongside the wider Regeneration Strategy but is central to its contextual understanding and implementation. This comprehensive approach to regeneration will be communicated through both the process of preparing the suite of documents that make up the overarching Regeneration Strategy and the eventual outputs. This will be communicated through Cabinet Reports, a Town Centre Communication Strategy and through the use of the interactive engagement space provided by the Urban Room
- Croydon Business Network as marketing and promotions vehicle for the Croydon Business Offer to -to highlight the business support available across the sectors
- Croydon Employment and Skills Forum -
- Croydon Works to further develop links with planning processes to enable jobs brokerage opportunities through the development -management and local plan processes.
- Croydon Works to reach out through the Urban Room space in the Whitgift -Croydon Works holds regular drop in sessions in the Urban Room to connect with Croydon residents and position their work within the context of the Town Centre and wider borough regeneration .
- Increased engagement with key businesses -to improve the Croydon Offer
- Linking with planning processes to enable jobs brokerage opportunities -through the development management and local plan processes.
- Offering tailored support to occupiers where known lease breaks are coming up . -
- Ongoing dialogue with major employers -
- Ongoing work with The Mayor to strengthen the business start-up and support programme -
- To work with partners and stakeholders to implement a Croydon recovery plan -that supports the economy and drives investment into the borough. - provide information to support businesses through the new relationship that has been established with the EU.
- Use of the London & Partners, Develop Croydon, Opportunity London & DBT -to help attract and retain major employers
- Use Sectorial Analysis to prepare an inward investment strategy -
- Working with Education providers -to ensure the provision of training for those employees who wish to be re-skilled for new job opportunities.

Future Controls	Implementation Date:
- Closer links with Top 20 employers through account management approach.	31/12/2025
- Implementing GLA funded business support package This includes business rate subsidies and office market stimulation measures	31/12/2025

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PST0011 Cheesbrough, Heather	Decrease in funding into the Growth Zone due to changes to local economy, decline in new commercial development and Legislation (Planning and Business Rates) therefore inability to secure expected level of business rate growth within the zone.	- Inability to undertake modelled level of investment and project delivery within the Growth Zone. - Delay to Growth Zone programme planning, approvals and delivery may be incurred due to limited resourcing to oversee the GZ financial model review and / or undertake GZ project programme delivery	Cheesbrough, Heather Last Review: 05/07/2024 Last Amended : 05/07/2024 12:03:29	4	4	16	3	1	3

Existing Controls

- Continual review of financial model and development and business rate growth within the Growth Zone. -
- Monitoring of delivery and business rate income via growth zone governance -(incl. Growth Zone, Business Rates and Finance teams representatives)
- Regeneration of the Croydon town centre to attract and retain businesses. - The town centre contains significant below prime office stock , that requires refurbishment and redevelopment as commercial stock. The Regeneration Strategy and Economic Analysis work and Inward Investment Plan will help inform and promote regeneration and planning activities .
- Regular monitoring of delivery and business rate income via GZ Steering Group and annual Growth Zone Cabinet Report -setting the budget and programme for the forthcoming financial year

Future Controls **Implementation Date:**

-

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
TRA0004 Sharon Godman	When unexpected issues or emergencies arise in business a usual then resource capacity may be drawn away from delivering Future Croydon transformation plan.	Delays or compromise in terms of time, cost, quality and benefit realisation and other objectives Financial benefits may not be achieved in the timeframe assumed in the Medium Term Financial Plan creating additional financial pressures on the Council Interdependencies with other programmes and projects within the transformation plan and wider corporate improvement may be negatively impacted	Godman, Sharon Last Review: 05/04/2024 Last Amended : 26/06/2024 08:24:55	4	4	16	4	3	12

Existing Controls

- -

Future Controls

- Additional resources are being agreed by CMT and recruited as necessary within allocated budget
- Delivery of the Blueprint Target Operating Model by

Implementation Date:

31/07/2024
01/10/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
VRN0060 Aspinall, Kristian	The Council is unable to adequately respond to civil emergencies / incidents as per their duties within the Civil Contingencies Act 2004	<ul style="list-style-type: none"> Residents without support for their needs and left in dangerous situations. Further damage or trauma to people, economy or environment, including death. Reputational damage. Breach of statutory duty. Financial loss; liability claims. Litigation/ public inquiry. Media and Political interest and scrutiny. 	Aspinall, Kristian Last Review: 04/07/2024 Last Amended : 04/07/2024 15:51:19	4	4	16	5	2	10

Existing Controls

- Growth bid for increased capacity in the EP team and increased security of out of hours arrangements -Growth agreed, recruitment proceeding.
- Lessons learned processes undertaken after major incidents -Reviews to take place across directors and partners following major incidents. Ongoing as required.
- London Resilience Networks -Engagement with London Resilience Network to ensure shared learning and mutual aid in the event of a large scale incident.
- On-call staffing: -- Council Gold
- Council Silver
- Resilience Advisor
- LA Liaison Officer
- Emergency Centre Manager

Reviewed on a 6 month basis.

- Ongoing delivery of staff training programme -Quarterly training sessions with Council Gold / Silver / Bronze, LALO and Emergency Rest Centre staff to ensure knowledge and best practice is shared . Ongoing.
- Physical & virtual Borough Emergency Control Centre (BECC) capability. - Tested every month by the Resilience team to ensure workable .
- Supportive & effective Croydon Resilience Forum/ Local Strategic Partnership relationships. -Monthly meetings to co-ordinate and plan across the local partnerships, including Police / Fire / Ambulance / Health.

Future Controls	Implementation Date:
- Annual review of Corporate Emergency Response Plan Annual review of Corporate Emergency Response plan to ensure up to date with correct named individuals , contact points, response plans & inline with national guidance and any legislation changes.	29/11/2024
- Annual review of London Mutual Aid protocol, incl. British Red Cross support. Protocol reviewed annually inline with council plans.	29/11/2024
- Annual review of rmergency response plan suite Reviewed on an annual basis to ensure our set of tools, equipment and facilities are appropriate for a variety of disaster situations, including flooding, pandemic, animal disease,	29/11/2024
- Pandemic response plan to be reviewed and updated Commissioning of an external specialist consultant to rapidly review and write the new Pandemic Response plan. To include significant learning exercises from Covid, and a shift from purely Pandemic flu planning to wider contagious disease outbreak plans.	30/09/2024
Work will include development of a new plan to be agreed corporately .	
Work will include new protocols for command and response organisation wide .	
- Team business continuity plans reviewed in Summer/Autumn 2024 Annual review of all service BCPs to ensure in place, appropriate and deliverable.	31/10/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CDS0018 Golland, Paul	IT systems are compromised due to cyber-attack, misconfiguration, malware, ransomware outbreak, other malicious system breach; or human error / non-compliance with GDPR.	<ul style="list-style-type: none"> • LBC ICT systems become unavailable or unresponsive, resulting in critical business functions being adversely impacted for significant period of time. • LBC would incur costs in containment and recovery. • Breach of confidentiality, integrity and availability of sensitive data (including personal data, sensitive personal data and business critical data). 	Golland, Paul Last Review: 24/06/2024 Last Amended : 28/06/2024 12:24:48	5	3	15	4	3	12

Existing Controls

- Implemented regular vulnerability scanning, technical compliance checks and remediation. -
- Improve security collaboration & knowledge sharing (including 3rd party suppliers and partners). -Capita provision of critical infrastructure information to review and share security vulnerabilities.
- Better defined security roles & responsibilities, in particular between 3rd party suppliers and internal teams. -Negotiated cyber support & tooling contracts and defining support roles with vendors regarding O365/Azure management. (
- Business continuity plans in place for loss of essential services helps minimise disruption. -
- Cloud migration into MS/Azure environment -
- Continue to improve & test back-up & recovery processes. -
- Cyber security expert introduced via Paul Golland -
- Enhance system and environment Lifecycle & decommissioning processes. -Data centre exit completed, process and decommissioning defined/finalised.
- Enhanced system and environment lifecycle & decommissioning processes -
- Expanded vendor risk assessment and management process. -
- Identity and access management improvements implemented. -
- Improve identity and access management (AD clean up) -
- Migration of key infrastructure from legacy datacentre to cloud. -
- New cybersecurity initiative & team operating. -
- On-going review & assessment of toolsets & configuration of current software... -....
- Security-by-design approach. -
- User awareness training and communication. -

Future Controls

- Business case to fix the plumbing that would allow projects to address these risks and reduce impact and probability Business case to seek investment into the following areas:
- Data Centre Hosting
- CITRIX Review
- My Resources Confirm to Oracle Interface
- My Resources Interface Upgrades
- LAN Refresh
- Mobile phone upgrade
- AI / Automation Pilot
- Intranet Improvement
- Managed Print Service Procurement
- Application Rationalisation Review
- CDS Restructure
- Azure Optimisation
- SharePoint & Teams Configuration Review
- Security Upgrade

Implementation Date:

02/09/2024

- Create dashboard to provide RAG based breakdown of 'failure concerns' by system Create dashboard to provide RAG based breakdown of 'failure concerns' by system (part of systems governance measures agreed by DICB) - 23
Shared by Sarah/Jon

31/08/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CDS0041 Golland, Paul	Customer complaints at all stages, as well as LGO investigations and recommendations, are not responded to within service level agreements.	Reputational damage Increase in Reports in the Public Interest Increase in complaint handling orders Increase in compensation Increase in customer dissatisfaction Impact to delivery of exit plan and to Mayors Business Plan	Golland, Paul Last Review: 27/06/2024 Last Amended : 27/06/2024 11:49:40	3	5	15	3	1	3

Existing Controls

- Attendance at DMT and CMT -
- Cabinet reports -
- Complaint reporting -
- Complaints team drive and chase responses and follow up on ombudsman recommendations -
- Improvement plans in place for directorates as per the exit strategy -
- Scrutiny committee -
- Service improvements to drive down complaints -

Future Controls

- That teams are structured to respond to complaints more quickly Ensure that teams have the right resources and processes in place to ensure timely responses.

Implementation Date:

31/08/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CEHR0065 Shoesmith, Dean	Payroll is not completed accurately and in a timely manner due to late notifications to payroll	<ul style="list-style-type: none"> • Staff not paid on time • Significant number of staff not paid correctly. • Statutory deadlines are not met. • Inaccurate reporting to HMRC. • Staff dissatisfaction and withdrawal of labour. • Reputational damage. • Financial penalties. • Legal action. 	Shoesmith, Dean Last Review: 02/04/2024 Last Amended : 04/07/2024 17:16:43	5	3	15	5	2	10

Existing Controls

- Payroll audits -Regular payroll audits are undertaken by Mazars to review payroll processes and accuracy, with recommended actions for improvement.
- Robust testing of quarterly releases. -
- Technical Payroll Specialist in post since 2021 to make systems improvements to reduce errors
- Temporary funding to support specialist post in the team
- Reconciliation checks -Regular payroll reconciliation checks are undertaken to ensure the accuracy of the payroll.
- Staff comms -Comms have been issued to managers and staff to remind them of the importance of completing timely payroll notifications as the most common reason for errors occurring .

Future Controls

- Oracle HR improvement programme The Oracle HR improvement programme (Cabinet 24 June 2024) provides a range on actions for payroll that seeks to make efficiency improvements and reduce payroll errors. Key to this will be improvements to Oracle Time and Labour with workflow systems for timesheets and pay adjustments that will reduce user error considerably and enable faster, more timely action. Similarly, and inter-dependent are changes being made to core HR functionality, with an emphasis on employee and manager self service through efficient workflows, enabling easier transactions reducing user time delays and errors.
- Prompt notification and improved management controls
- Prototype HR Dashboard being shared with DMT/CMT
- The dashboard is being further developed with a view to producing payroll data, to include late action for this so it can be shared at DMT level .

Implementation Date:

31/12/2024

31/12/2022
31/12/2022
31/03/2025

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
FIR0062 Bannin, Allister	Funding levels provided through Government Grants for future financial years are uncertain and may be lower than anticipated post the general election resulting in savings being required to balance the Council's Medium Term Financial Strategy.	<ul style="list-style-type: none"> • Service disruptions or services ceased. • Key Mayor's Business Plan and corporate priorities not achieved. • Resident dissatisfaction. • Media and political scrutiny. • Legal challenge and associated consequences. • Staff reductions / redundancies. • Unable to deliver a balanced budget. • Section 114 notices continue to be served. 	Bannin, Allister Last Review: 16/04/2024 Last Amended : 04/07/2024 17:54:00	5	3	15	5	3	15

Existing Controls

- Continued lobbying with DLUHC for fair funding -
- Continued maintenance of general fund reserve at £27.5m -Minimum level of reserves to be 5% of the net revenue budget to cover any major unforeseen expenditure.
- Detailed MTFS planning throughout the year -
- Fair Funding Review, Business Rates Reset, Adult Social Care Reform and other changes to LA finance system currently delayed -

Future Controls

- Strategic approach applied to identify efficiencies and savings and project managed approach to delivery through changes to the way the Council works e .g. One Council approach with cross-Directorate working, the Transformation Programme, exploiting new technology, consolidation of buildings and processes.

Implementation Date:

28/02/2025

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
FRI0003 Davies, Malcolm	Ineffective management of identified risk leads to organisational failure .	<ul style="list-style-type: none"> • Inaccurate risk reporting leads to risk materialisation and consequences associated with them. • Service disruption, death or serious injury. • Political and media interest and scrutiny. • Leadership Team (senior officer / Cabinet Member) resignations / potential legislative action taken against individuals. • Continuing and increasing financial loss. • Public unrest / disorder. • Legal action against Council instigated. • s.114 Notice submitted. • Political scrutiny (national level). • Media interest and scrutiny. • Regulator criticism. 	Davies, Malcolm Last Review: 11/04/2024 Last Amended : 04/07/2024 18:02:16	5	3	15	5	2	10

Existing Controls

- 'Take a step back' risk workshops for each Corporate Director and their management team -Refreshed RM training for each RM champion and additional session for elected Members provided.
- Continuous horizon scan review of national and global events / trends. -
- Effective risk recording / reporting mechanism in place allowing for 'high level Risk Register reporting to leadership. - CMT are accountable for successful delivery of the Council's Risk Management Framework.
- Establishment of the Finance and Assurance Internal Control Board -Board meets monthly with cross-Directorate representation. Oversees the corporate risk management process.
- Frequency of management oversight of risk register has increased at a senior level in line with demand. -
- Rapidity of escalation to CMT amended to achieve desired outcome. -
- Risk is standing item on regular CMT risk reviews. -
- Robust corporate Risk Management Framework in place. -
- Upgrade to JCAD Risk system has made it easier for risk owners to keep control measures under review -Upgrade has included refreshed RM training for all risk owners and their ESOs and EOs via training video and risk champion support

Future Controls	Implementation Date:
- Forward Plan for 2024 25 A forward plan of risk review meetings attended by the Head of Fraud , Risk and Insurance (or deputy) being delivered during 24/5. This includes quarterly Corporate Director DLTs, Risk Management Steering Group, Finance Risk & Assurance ICB and in addition monthly CMT for red risks .	31/03/2025
- Planned introduction of new risk reports to Audit & Governance Committee including risk rating reports assessing changes to risks and their risk rating and publication of the full risk register on the Council's website.	01/08/2024
- Quarterly risk review and deep dive for Audit & Governance Committee Quarterly risk reviews and deep dives for Audit & Governance Committee are scheduled to be delivered through 2024/25 to enhance the assurance process	31/03/2025

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HOTS0005 Larbie, Mary	Breach of Regulatory Standards not addressed. Standard was breached in 2021 (Regulatory Standard for Tenant Involvement and Empowerment Standard) now superseded by Transparency , Influence and Accountability Standard .	Increased regulatory scrutiny Lack of confidence by residents and wider sector Increased recruitment challenges	Larbie, Mary Last Review: 24/06/2024 Last Amended : 29/06/2024 11:13:39	3	5	15	3	5	15

Existing Controls

- Increased resident engagement.... -The approval of the Resident Engagement Strategy by Cabinet and full Council, followed by it's implementation. Ongoing meetings with the Regulator and the continual embedding of the Residents Charter. Monitoring of the Tenant Satisfaction Measures , ongoing review and action taken to analysis results and reach out to residents to address issues raised.

Customer Information is being reviewed - this involves the evaluate of information captured for customers, profiling customer information, ensuring characteristics are used to inform communication channels and service deliver-Phase 1 - Review of all tenancy information on the website is now completed – design of new information channels in progress.

Customer Care Training Programme- The programme seeks to Transform customer interactions through a programme of training focused on behaviour and creating a positive customer experience .--As of January 2024 -Customer Care programme is progressing into the discovery stage – meetings with customers, managers and staff to gather examples to feed into the training . This has been completed and we are entering design stage.

Review of Customer Care programme is progressing into the discovery stage – meetings with customers, managers and staff to gather examples to feed into the training . This has been completed and we are entering design stage- The purpose of which is to improve and standardise responses, minimise backlogs and learn from complaints – ensure the process for managing complaints is easy to navigate for customers- As of January 2024 -Action plans in place with Housing Repairs and Housing Needs & supply to clear the backlog of cases. Updated complaints policy to ensure it is in line with HO requirements. Will publish the new policy and our current self assessment in Jan 2024. We are also recruiting additional staff members to work on the backlog and improve response times . Complaint Backlog on target to be cleared by 31st January

Review of Policies and procedures- The purpose of which is to aligned with a new operating model, new contractors, new service standards and utilising our customer data – a review of our procedures and policies to deliver better outcome for our customer base . The position in January 2024-4 policies have been developed and are under review.

19 residents have volunteered to help review new policies. Process in place for managing this. A questionnaire has been drafted so residents can provide additional feedback on the experience .

Resident Involvement Framework had been co designed by the Design Group, which is made up of residents and staff supported by TPAS- concept and way forward had been presented to TLP and DMT- Members briefings agreed- first briefing 12 April , second 30 April

Customer Care Training first session 1 May - All directors and heads of service to attend Resident Engagement Strategy co designed with residents- Strategy to be presented to cabinet for approval on 15 July

Future Controls

-

Implementation Date:

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HSI0052 Hanlon, Sue	Outcome of structural appraisal for LPS Portfolio confirms significant work required or decant of blocks (16 blocks).	If the assessment highlights significant issues with the blocks, this may lead to Regulatory implications; potential reputational damage, potential increase in financial obligations due to cost of remedial works, and resident dissatisfaction, if decants/significant works required	Hanlon, Sue Last Review: 08/07/2024 Last Amended : 08/07/2024 08:53:14	5	3	15	4	3	12

Existing Controls

- Structural appraisal of LPS blocks -A plan has been approved to undertake a phased approach to structural investigation /appraisals for Type A and Type B LPS blocks. Our plan commences with the first investigation at our decanted block at Regina Road (1-89). This investigation will include intrusive surveys by sector leading experts and reports are expected over summer 2024. Learning from this structural investigation will support us with our approach to the future investigations. Our LPS portfolio have sprinkler systems and no mains gas, and the Building Safety Regulator will consider this when assessing the overall safety of these buildings.

Future Controls

- following first investigation at Regina Rd 1-89, the findings will inform the next stage of work

Implementation Date:

08/07/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HSI0055 Hanlon, Sue	Additional costs as a result of lengthy investigation into the safe occupation of Sycamore House following the fire in 2022.	Delays to safe re-occupation of Sycamore House and reduction in availability of temporary accommodation in borough. Potential that LB Croydon may be liable for costs of fire safety remedial works under the terms of the lease/management agreement.	Hanlon, Sue Last Review: 08/07/2024 Last Amended : 08/07/2024 08:50:23	3	5	15	4	4	16

Existing Controls

- Appoint Fire Expert -Fire expert appointed March 2024. Surveys underway.
- Legal advice received in January 2024 details action to be taken to bring matter to resolution -Following legal advice, we have instructed fire expert to undertake intrusive surveys to determine if the property is safe to occupy. Fire Safety and technical reports expected August 2024. During this period, we have continued to engage with representatives from Cheyne Capital and they have been present at site meetings.
- Obtain External Legal Advice -Counsel appointed in December 23 and advice received in January. Advice includes appoint expert

Future Controls

- Following completion of the intrusive surveys next steps can be planned

Implementation Date:
01/07/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HSI0056 Hanlon, Sue	Increase in void costs as a result of the poor state of properties returned following tenancy termination	HRA budget overspend due to increase costs of works; Void turnaround time negatively impacted due to the increased level of works required to meet our lettable standard resulting in additional rent loss.	Hanlon, Sue Last Review: Last Amended : 19/06/2024 13:39:25	3	5	15	3	4	12

Existing Controls

- Pre-termination inspections to assess works required and remind tenants of obligations under tenancy agreement -Ensure pre-termination inspections are scheduled and take place during 4 weeks notice period. Opportunity to review condition of the home and ensure tenant's aware of works they are responsible for before they hand keys back.
- Tenancy Audit visits -Tenancy audit visits annually to check who is residing in the home and also what the condition of the home is . Visit useful for reminding tenants of their repair responsibilities and ensure repairs that are the landlord responsibility have been reported.
- Weekly Voids Meeting -Weekly voids meeting to monitor void works and achieving void turnaround target - meeting chaired by Director of Tenancy

Future Controls

- Consider introducing recharge policy Recharge policy could be useful for missed appointments, repairs undertaken whether tenant abuse/tenant responsibility and where tenancy terminated and property returned in poor state of repair.
- Use data to identify high cost voids (geographical location and customer segmentation) Quarterly reports to identify high cost voids - data will identify whether trend in geographical location and consider whether intensive housing management required for specific customer groups or blocks.

Implementation Date:

01/10/2024

02/09/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HSI0058 Hanlon, Sue	Risk of new development and acquisitions not being compliant in terms of fire and building safety and other legislative requirements. This risk applies both for new properties in the portfolio and temporary accommodation.	Failure to meet legislative requirements in the first instance will incur unforeseen costs for remediation but more fundamentally could impact on safety.	Hanlon, Sue Last Review: Last Amended : 28/06/2024 09:39:47	5	3	15	5	2	10

Existing Controls

- Scheme Risk Appraisal Panel -Panel established with reps from housing, children's, adults, finance and commercial investment teams to evaluate and appraise every scheme.

Future Controls

- Checklist for further acquisitions Further checklist being developed by Head of Building Safety, informed by previous issues, to enhance these appraisals

Implementation Date:
02/09/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
MO0020 Lawrence-Oru mwense, Stephen	Deterioration in Internal Control and Governance as a result of capacity, budget and resourcing constraints in the organisation.	<ul style="list-style-type: none"> Financial / Reputational and Legal implications arising from bad decision making. Poor data control leading to lack of financial control Inadequate financial governance Failure to comply with probity requirements, legislation, local regulations or council policy. Potential future S114 Notices. Further reports in the Public interest. 	Lawrence-Oru mwense, Stephen Last Review: 24/06/2024 Last Amended : 25/06/2024 17:18:20	5	3	15	4	2	8

Existing Controls

- Higher profile of key policies and procedures and easier access to support and guidance. -
- Culture of Compliance internal audit underway.
- Compliance training to be delivered during 2024.
- Governance intranet pages to be improved.
- Robust Internal Audit Programme in place.
- Spend Control Panels in place.
- Extended Management Teams discusses governance and internal control at every meeting

Future Controls

- An Oracle improvement project has been established that will run for two years.	Implementation Date:
• Targets to increase the efficiency and effectiveness of the Council's existing Oracle Enterprise Resource Planning system	30/06/2025
• Resources allocated from earmarked reserves for the project.	
- Implementation of the Procurement and Contract Management Improvement Plan	31/03/2026
• Procurement and Contract Management Improvement Plan signed off and being delivered .	
- New structure being implemented for the Finance Team including recruitment of new apprentices for Cipfa & AAT	31/03/2025
- Review of training offer by L&OD to ensure provision of 'fit for purpose' support to all employees.	31/12/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PH0002 Fallon, Andrea	Ongoing challenge of low level of immunisation and vaccine hesitancy particularly with MMR, Influenza and Hep B in infants. This risk is increasing with the current significant increase of measles and communicable disease in London and the below target vaccination rates allow communicable disease to spread and residents to become unwell when exposed.	<ul style="list-style-type: none"> • Increase in serious health complications & potential deaths. • Increased cost of interventions. • Failure to safeguard population. Hospitalizations up for unvaccinated	Fallon, Andrea Last Review: 24/06/2024 Last Amended : 26/06/2024 13:43:38	5	3	15	5	3	15

Existing Controls

- Collaborating with ICS/Primary care in Croydon -- review call / re-call systems in GP's surgeries.
 - Primary Care Plan in place: -- MMR recording;
 - Memorandum of Understanding with SWL
 - Partnership working across Croydon agencies.
 - Regular Croydon immunisation Steering Group meetings. -A multiagency group meets to agree actions to increase vaccination increase . the vaccinations occur mainly with Primary Care and are commissioned by NHSE/I.
- Previous communication campaigns alongside NHS to improve vaccination rates
The learning from covid vaccination is supporting the work.
- Targeted MMR campaign Augst 2023 -Working closely with the NHS, who are leading this, there is a targeted campaign developed in August and September 2023 to increase the uptake of MMR
 - Transformation of Child health Records - NHS England. -this will be discussed/reviewed in the Health Protection forum

Future Controls

- Action Plan A refreshed Croydon Immunisation Action Plan to be developed - implementation date 1/9/2024

Implementation Date:

01/09/2024

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
PST0026 Cheesbrough, Heather	<p>Significant increase in Planning Appeals and JRs , in particular public enquiries and hearings, these have considerable costs that are unbudgeted for within the service. In some instances the LPA may have to pay appellants costs and with JRs legal costs are always generated.</p> <p>Planning has become increasingly litigious and recent changes by central government through LURA and significant member and resident interest in planning decisions coupled with a requirement to meet the housing target, and in particular the small sites target, has made decision making much more contentious and adversarial.</p>	<p>Pressure created on budgets Staff have additional detailed , resource intensive and non fee generating work in addition to existing high workloads. Impact on meeting other government performance targets when resources are so under pressure. Reputation</p>	<p>Cheesbrough, Heather</p> <p>Last Review: 05/07/2024 Last Amended : 05/07/2024 12:05:09</p>	3	5	15	3	5	15

<p>Existing Controls</p> <ul style="list-style-type: none"> - Clear advice and reports to Planning Committee to enable defensible decision making - - Close working between Policy , DM, Strategic Transport, Enforcement and Tree teams -Regular meetings of Case Officer Briefing Review and Analysis (COBRA) to ensure consistent decision making and collaborative working across the Directorate - Collaboration with the legal service to review likely contentious decisions and reports - - Continue learning through experience training for officers in relation to appeals and JR cases - - Engage PAS to assist in a further programme of Committee Training - - Management oversight of Officer delegated reports and appeal statements -Clear delegated sign offs and mentoring of case officers - Member Training of Planning Committee -Defensible Decision making Training by PAS of Planning Committee members - Regular Monitoring of appeal data to understand trends and learn lessons - and provide early warning if the LPA begins to significantly increase the number of appeals upheld above the national average . 	<p>Implementation Date: 31/12/2025</p>
<p>Future Controls</p> <ul style="list-style-type: none"> - Increase legal planning support from 3 days per week to 5 days per week, however this is unbudgeted currently and requires further discussion with legal 	

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
VRN0056 Aspinall, Kristian	<p>A complaint is made to DCMS regarding the consultation process for the Croydon Libraries Review which is upheld.</p> <p>This would prevent any changes to the Library service model, which would mean the current service which is not fit for purpose continues to operate. This would have a financial and reputational impact to the council, and prevent the improvements needed to the service.</p>	<p>Costs for legal advice, and if upheld, fines from failure for delivering statutory library services which are "comprehensive & efficient,".</p> <p>Failure to implement a new model would stop the investment planned for the service by shifting resources from buildings to staffing and opening hours.</p> <p>Failure to change would prevent us improving the stability of current service, including the frequent closure of buildings due to staff absence.</p>	<p>Aspinall, Kristian</p> <p>Last Review: 04/07/2024 Last Amended : 04/07/2024 12:31:04</p>	5	3	15	4	3	12

Existing Controls

- Commissioning of "Activist" agency to support Libraries asset programme -and ensure consultation is meaningful and decisions made
- Comprehensive engagement with IAP -Regular meetings with the IAP , including advance copies of report, draft findings, and detailed consultation results and independent analysis findings.

This enables them to support the change, and help us make the case to DCMS on the need for change and the comprehensiveness of the work and consultation.

- Regular meetings with DCMS as the library transformation plans develop -Ongoing monthly meetings
- Resident engagement about Library transformation as part of community hubs programme -Consultation completed.

Future Controls

- Draft report to be shared with DCMS before September Cabinet Report currently being drafted with recommendations following consultation, report to be shared with DCMS in advance of publication for their feedback and views on risk of challenge.

Implementation Date:
30/08/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
ASCI0020 Byrne, Bianca	Ability to effectively prepare for the CQC Local System Assurance and evidence practice and delivery - not all functions (see risk 22) are direct control of the Directorate.	- Reputational damage for Council and partners. - Reputational damage for ASC&H - Evidence of failing services to support residents. - Risk of ineffective partnership working and damage to relationships with partners.	Byrne, Bianca Last Review: 25/06/2024 Last Amended : 25/06/2024 08:48:32	4	3	12	4	2	8

Existing Controls

- Assurance preparation -- Dedicated member of staff
- Assurance Board and 5 working groups
- Programme of preparedness already under way.
- Reporting to Performance Board on a monthly basis.
- Comms and engagement continues with system partners and staff. -Assurance and Improvement newsletter is being published monthly. Comms plan in development
- Working with Directors to review Peer Challenge communications and plan being developed .
- Creating a TEAM page - so staff can be sighted on tools available .
- Independently Chaired - Improvement Board -In place
- Workshop with Performance colleagues to understand capacity to delivery data and analytics -
- Workstream leads have been appointed to provide focus on key areas . -New working group leads have been identified - regular meetings diarised.
- Monthly updates provided to Assurance Board via Highlight Report
- Some meetings have already commenced.

Future Controls

- Additional capacity in Improvement Team with dedicated resource . Staff will be in post
- Recruitment has happened and posts offered and accepted . Full team should be in post by July.

Implementation Date:
31/07/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CEHR0051 Shoesmith, Dean	Under representation across protected characteristics at all levels of the organisation and under reporting due to high levels on non-disclosure.	<ul style="list-style-type: none"> • Employee relations. • Reputational damage. • Discrimination claims. • Restrictive recruitment / retention issues. - Not meeting the equality strategy 	Shoesmith, Dean Last Review: 02/04/2024 Last Amended : 04/07/2024 17:17:35	3	4	12	3	3	9

Existing Controls

- A new workforce EDI Dashboard has been developed and is considered by EDI Board -The dashboard identifies areas of under representation and areas of non-disclosure with recommended actions to address these shortfalls
- A new workforce EDI dashboard is being developed so that it is provided to the Internal Control Board for EDI -on a quarterly basis and to highlight with workforce data the trends and issues of under-representation, so that targeted actions and improvements can be taken. The new monthly HR dashboard for DMT's will also take a complementary approach so that directorates can be supported to take appropriate positive action measures. Ongoing disclosure campaigns have seen workforce disclosures improve over the last 12 months and the campaigns will continue together with support being gained from the various staff networks for protected characteristic groups.
- Current data shows positive progress with a more representative intake of candidates compared with the existing workforce -profile
- Development of a baseline data suite, with regular monitoring, to support priorities in Croydon Renewal Plan. -Dashboard
- Diverse recruitment panel and new standards for recruitment including anonymous shortlisting. -
- Diversity awareness campaign to increase disclosure. -
- Gender, disability and ethnicity pay gap reporting. -
- New Council equality strategy launched and monitored corporately. -
- Positive Action Development Programmes. -
- Quarterly workforce profiling at DLT's. -
- Reporting on missing recruitment screening data is being addressed and regular quarterly reporting is provided to -EDI Board and CMT.
- Use of secondments for development and inclusive adverts wording. -
- Work undertaken via the EDI Board (priority 2 development) to establish clear prioritised workforce EDI metrics, -dashboards and identification of areas for action and improvement. Completed 30 September 22
- Workforce Strategy Action Plan implemented. -

Future Controls

- The Council's Recruitment landing page to be rebranded and made more attractive to ensure diverse images attract diverse candidates from different protected characteristic groups . Aim to launch in 2024/25.
- The recruitment policy and process is being redesigned to improve accessibility to address EDI issues

Implementation Date:

31/03/2025
16/05/2023

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CEHR0059 Shoesmith, Dean	Levels of agency/contract/temporary staff at all levels of the organisation including senior management may lead to service and workforce instability as well as increased cost.	<ul style="list-style-type: none"> • High agency costs. • Reduced alternative employment opportunities for employees displaced and on the redeployment register, such as due to redundancy. • Employee relations issues. • Litigation costs. • Reputational damage. • Leadership and continuity impact 	Shoesmith, Dean Last Review: 02/04/2024 Last Amended : 27/06/2024 13:24:02	3	4	12	4	2	8

Existing Controls

- Workforce strategy -Regular monthly agency analysis including spend and placement numbers is provided to CMT. The recruitment Spend Control Panel, reviews all requests for temporary recruitment, including agency workers and may challenge hiring managers to take alternative options to reduce agency costs. CMT has agreed recruitment and retention packages in key occupational skills scarce roles such as children's and adult social care, to ensure more effective measures to stabilise the workforce .

Future Controls	Implementation Date:
- Agency Cap Agency spend and numbers to be capped for each directorate to ensure that costs are not exceeded above the cap .	01/10/2024
- Agency Worker Review CMT and DMT's to hold challenge sessions to review the use of agency workers and reduce where possible , and/or put in place less costly alternatives.	01/10/2024
- Target Operating Model Review Boston Consulting Group to review as part of the target operating model work aiming to reduce cost and workforce instability for the new target operating model.	01/10/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CEHR0080 Shoesmith, Dean	Managers completion of reasonable adjustments (or lack), when requested by a disabled employee, and/or upon receipt of an occupational health report making a reasonable adjustment recommendation.	Failure to put a reasonable adjustment into place places the council at considerable risk of employment tribunal proceedings and associated costs, both reputation and financial.	Shoesmith, Dean Last Review: 02/04/2024 Last Amended : 25/06/2024 17:25:57	3	4	12	3	3	9

Existing Controls

- Managers' guidance on making reasonable adjustments for disabled employees . The guidance has also been recently reviewed and -updated.
- Regular contact between the CPO and disabled staff network to provide a conduit for issues to be raised , including the lived - experience of disabled staff.

Future Controls	Implementation Date:
- ACAS training to be provided to manager on managing challenging reasonable adjustment cases, including mental health.	31/03/2025
- New corporate budget and associated allocation procedure and process being developed for funding reasonable adjustments.	31/03/2025

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
ED0008 Davies, Shelley	Increasing number of families electing to home educate places an additional burden in relation to our safeguarding responsibilities in this area. This will be a focus area during the ILACS Inspection. Head of Access to Education focus on this area.	<ul style="list-style-type: none"> • Death or serious injury to clients. • Service interruption / failure. • Reputational damage. • Financial loss. • Legislative action. 	Davies, Shelley Last Review: 30/06/2024 Last Amended : 03/07/2024 16:21:54	4	3	12	4	2	8

Existing Controls

- Additional capacity within the team -
- Home visits and review of safeguarding activities for those children identified as being 'at risk'. -
- Increase in staff -
- Information is provided to schools through bulletins, forums in relation to support services -e. g Targeted Early Help (Key work and Youth Engagement , Family Justice Centre, Parenting, Children's Centres for support).
- Monitoring and periodic review of Safeguarding and Child Protection arrangements in schools. -
- Multi-Agency review of activities / intelligence sharing to ensure best practice activities operating. -
- Regular review of identified risk by appropriate officers. -

Future Controls **Implementation Date:**

-

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
ED0011 Davies, Shelley	That the Council does not deliver the Safety Valve Programme and are not meeting the KPI's. This would result in the loss of the 2024 - 2027 Safety Valve payments amounting to £13.16m.	The impact of not meeting the KPIs mean that the LA will not receive the safety valve funding to pay down the cumulative deficit which would be a risk to the GF	Davies, Shelley Last Review: 30/06/2024 Last Amended : 03/07/2024 16:35:15	4	3	12	4	3	12

Existing Controls

- Regular monitoring with the DfE Safety Valve team -The Director, Head of Service and finance team meet regularly to review the KPIs and any risks identified to meeting them
- Robust monitoring of Safety Valve plan -Internal monitoring of the Safety Valve financial KPIs

Future Controls

- Increase provision within the borough Work with schools and Trusts to increase provision in the borough through creation of new Enhanced Learning Provisions .

Implementation Date:
02/09/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
EHSCSC0020 Madden, Roisin	Risk as homeless 16 & 17 year old children are not adequately assessed and provided for when presenting to Croydon Council. This risk is jointly held with Housing Directorate.	Children's needs for housing and/or accommodation via Children Act Sec 20 are unmet or delayed leading to risk of harm. Poor inspection outcome therefore reputational risk	Madden, Roisin Last Review: 04/07/2024 Last Amended : 04/07/2024 17:47:51	4	3	12	4	3	12

Existing Controls

- CSC & Housing Joint Housing Protocol -This control measure is jointly owned by Housing & Children's Social Care Directors as it is a joint protocol. The protocol needs to be shared widely in CSC and Housing divisions to ensure all relevant staff understand the content and application .
- Housing Officer capacity available to undertake joint housing assessments -Housing officer capacity available

Future Controls

- Robust contingency plan providing cover in the absence of the MASH Housing Officer Cover for the MASH Housing Officer role needs to be in place to ensure that there are no gaps in the available resource to respond to 16 & 17 year old's who present up to 5pm on any day needing an assessment jointly by Housing and Children's Social Care
- Training for all relevant Housing & Social Care staff All staff who undertake, or who may be asked to undertake joint assessments of need for 16 & 17 year old's presenting as homeless, need to complete the required training to ensure they are equipped to respond in line with legislation, standards and protocols.

Implementation Date:

15/07/2024

31/08/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
FIR0066 Bannin, Allister	The SW London Integrated Commissioning Board may reduce the Better Care Fund by £1M to bring it into line with the provision it makes to the other 6 Local Authorities in the SW London area.	Loss of £1m income (currently held in Adult Social Care & Health) resulting in significant service cuts.	Bannin, Allister Last Review: 17/05/2024 Last Amended : 04/07/2024 18:10:38	4	3	12	4	3	12

Existing Controls									
- Decision on funding is outside the control of LBC. -LBC and ICB Croydon Place continue to have regular dialogue regarding this funding with the Corporate Director sitting on the Executive Board									
Future Controls								Implementation Date:	
-									

Risk Ref	Risk Scenario		Assigned To	Current			Future Risk Rating		
	Risk	Impact		Impact	L'hood	Total	Impact	L'hood	Total
FRI0001 Davies, Malcolm	The Council is subject to a sustained increase in attempted fraudulent activities from employees, suppliers and residents if levels of control are perceived to be low.	<ul style="list-style-type: none"> Financial loss. Reputational damage. Residents and staff placed in potentially harmful situations. Political scrutiny. Media interest. Resident frustration and dissatisfaction with the levels of control applied within the organisation. 	Davies, Malcolm Last Review: 11/04/2024 Last Amended : 25/06/2024 20:05:38	4	3	12	4	2	8

Existing Controls

- Application of separation of duties methodology. -
- CIFAS screening for new employees to target harden council introduced -
- Corporate Policies in place and applied -Including refreshed antifraud strategy approved by Audit & Governance committee
- Counter Fraud Shared Service is in place with Lambeth which has significantly bolstered the service -
- CTAX SPD exercise NEC/Experian for 23/24 -
- Effective comm's applied including new intranet 'landing page' for fraud matters. -
- Fraud hotline operational. -
- Internal Audit Programme to identify fraudulent activities . -
- Refreshed antibribery and corruption policy -
- Refreshed whistleblowing policy -
- Review of corporate antifraud team and potential partnership with another local authority -Currently interim management support and partnership is being provided by London Borough of Lambeth which is providing invaluable input and support to strengthen both investigations and our risk management strategy
- Roll out of NFI Fraud Hub -Starting with BAU mortality screening against fortnightly GRO DDRI report for major council services. Pensions, Blue Badges and Housing top of the list.
- Routine Screening for successions for tenancies introduced -
- Routine Screening of housing RTB introduced -

Future Controls	Implementation Date:
- Comprehensive review of NFI match results Interim resource continuing to work on this with both cashable direct and indirect savings being achieved	01/12/2024
- Future media campaign (targeted comm's) to reinforce the Council's position in terms of zero policy against fraud activities. Internal comms campaign	30/09/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HAS0021 Cingtho-Taylor, Beatrice	Homelessness and Temporary Accommodation Case Level Information Collection (HCLIC) to government.	Financial - reduction of Homelessness Prevention Grant (HPG) of up to 10% for failure to provide accurate data Quality of data - inability to identify demand trends and cost pressures	Cingtho-Taylor, Beatrice Last Review: 25/06/2024 Last Amended : 08/07/2024 13:46:17	4	3	12	2	3	6

Existing Controls

- Communication with Department of Levelling Up, Housing & Communities (DLUHC) -Regular meetings held with DLUHC to keep them informed of actions being taken to submit accurate and reliable data to minimise risk of grant clawback.
- Training to staff -Training on use of NEC to record, update and manage cases has been rolled out to improve the quality of the data being submitted to the government.
- Understanding homelessness grant conditions beyond current 2023-25 settlement - Regular meetings with DLUHC Advisors
- Working with NEC Project Team and Supplier -(a) Working closely with NEC Team to identify system issues, apply fixes and test to ensure it works.
(b) Reviewing system scripts to ensure the data specification is line with the government's data requirement.
(c) System reports are regularly run to identify data errors and being corrected.

Future Controls

- Data quality checks (a) Regular upload of data from NEC into government DELTA system ensures any data quality issues are identified and fixed ahead of the submission deadline

Implementation Date:
31/08/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HOTS0006 Larbie, Mary	Financial Impact of rent increase on tenants not entitled to housing benefit or the universal credit element of housing payments	Tenants experience financial hardship - Tenants not able to sustain tenancies Reduction in income collection	Larbie, Mary Last Review: 24/06/2024 Last Amended : 08/07/2024 16:20:34	3	4	12	3	4	12

Existing Controls

- Financial Impact of rent increase on tenants not entitled to housing benefit or the universal credit element of housing payments - A Tenant's Hardship Fund was set up in April 2023 to support tenants with payments of up to £500, where there was no entitlement to housing benefits or housing related Universal Credit cost- During 2023/ 24, 119 tenants were able to benefit from the fund, which has continued into 24/25, hence ongoing attempts to promote the fund and reach out to tenants, who may be entitled to benefit from it or in a number of cases other benefits.
- Project group put in place to support tenants who are/ were not in receipt of any benefits -Prior to the rent increase, just over 4000 letters were sent to tenants who were not in receipt of any benefits. A Project Group was subsequently put in place to provide support and advice to tenants as well as a Discretionary Hardship Payment Fund- The project is ongoing , with the aim of contacting all tenants directly by the end of May 2023
- Review of approach to joint working with wider stakeholders to combine resources. -

Future Controls

- continue to communicate fund review approach as next increase is due later this year

Implementation Date:

01/10/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HP0003 Hallett, Matthew	Insufficient cash-flow and maintaining adequate liquidity	<ul style="list-style-type: none"> Financial challenge / insolvency. Inability to operate / deliver services. Staff / suppliers not paid. 	Hallett, Matthew Last Review: 16/05/2024 Last Amended : 29/06/2024 09:06:20	4	3	12	4	3	12

Existing Controls

- Drawdown schedule with DLUHC for 24-25 in order to refinance £75m of loan maturing during 24-25 has been agreed. -
- Asset sales should ensure the Council has sufficient cash to meet planned capital and revenue expenditure .
- Expenditure controls to help reduce cash pressures in year. -
- Regular and accurate review of cashflow and financial planning of monies going in and out of the Council. -
- Undertaking a review of anticipated income streams and expenditure on a weekly basis -

Future Controls

-

Implementation Date:

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HSI0039 Hanlon, Sue	The Council's housing repair contractors fail to deliver service in line with contractual obligations, leading to increased complaints, Housing Ombudsman maladministration findings resulting in regulatory intervention and reputational damage	Unable to deliver statutory landlord responsibilities for repair, maintenance and safety checks to our housing stock, placing the Council at risk of breach of statutory responsibility and tenants will be at risk.	Hanlon, Sue Last Review: 08/07/2024 Last Amended : 08/07/2024 08:59:03	4	3	12	2	3	6

Existing Controls

- Robust contract management and oversight of the service -Contract management meetings in place to ensure service meets KPI targets and a culture of continuous improvement is developed
- Regular reporting of performance to DMT/CMT/Portfolio Holder and Cabinet
- Improvement plans will be initiated if performance falls below minimum level of acceptable performance
- Benchmarking with other provides in the sector to ensure service remains in mid/upper quartile performance

Future Controls

- Annual reviews

Implementation Date:
08/07/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HSI0044 Hanlon, Sue	The Council does not deliver its landlord obligations for the delivery of the Capital investment across the HRA estate , these include Decent Homes, HHSRS, Fitness for Habitation, Homes standard. New IT system potentially impacting delivery of works	<ul style="list-style-type: none"> • Unsafe buildings. • Enforcement action against the Council by regulatory bodies. • Political scrutiny and interest at local and national level. • Media interest at local and national level. • Substantial financial loss. • Serious incident / injury. • Government intervention • Carbon Neutral targets not met • resident dissatisfaction and complaints/MP/Mayoral enquiries and possible ombudsman intervention • resident impact - for example fuel poverty. Properties aren't safe and warm and affordable to live in	Hanlon, Sue Last Review: 09/05/2024 Last Amended : 24/06/2024 16:30:09	4	3	12	2	2	4

Existing Controls

- Current ongoing Control Processes include: -Capital Programme Review & Monitoring: Monthly monitoring meetings set with capital programme leads
Highlight reports completed by programme leads capturing progress, risks, challenges and opportunities
Reporting to Assets & Capital Delivery Board meetings set to review progress, governance, risks and change control mechanism
Reporting to Corporate Capital Delivery Board for urgent risks/issue and escalations
Continuously review DH failures on a regular basis, including HHSRS cat 1 failures which cause a DH failure
- Development of an Asset Management Strategy determining investment needs -Complete 20% stock condition surveys per annum to inform investment plans; Investment plan and strategy informs future delivery models (capital delivery suppliers); Future delivery models inform commissioning/procurement strategy.
- Increased number of suppliers other than existing partners promotes healthy competition, contributes to competitive pricing (VFM) and delivery assurance
- HRA Business plan investment plans in place -1, 5, 30 year business plans in place which use stock data and address current needs and future requirements
- Monthly contract management meetings in place -Includes reviewing service delivery, customer complaints, commercial position and risks.
- Review of team structure to ensure adequate resources in place to deliver service in line with regulatory requirements -Review of existing structure and skills capability assessment.

Future Controls

-

Implementation Date:

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HSI0053 Hanlon, Sue	Attract Recruit and Retain Good Quality Permanent Staff in housing function	Unable to deliver on transformation and broader service improvements to stated timescales.	Ashley, Lara Last Review: Last Amended : 08/07/2024 12:06:51	3	4	12	3	4	12

Existing Controls

- Develop team structures and obtain approvals -Develop structures and internal sign off.
- Build new service Culture, training investment - roll out of customer first training
- Housing transformation plan to build improvements
- Internal directorate communication
- Tackling under and poor performance

Future Controls

- Create Recruitment and resourcing plans to address challenges We will create resourcing plans which capture the scale and range of recruitment so we can plan campaigns and utilise specialist comms to attract staff. **Implementation Date:**
30/09/2024
- External communication plan to highlight improvement work particularly engagement work with residents 16/08/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HSI0054 Hanlon, Sue	Ensure there is sufficient resource in all service areas to achieve required service standards	Delays in achieving new target operating structure will lead to delay in delivering service improvements	Hanlon, Sue Last Review: Last Amended : 24/06/2024 16:31:00	3	4	12	3	4	12

Existing Controls

- Identify and recruit to key vacant roles, ideally on a permanent basis. - Target operating model being developed with new Heads of Service ; Permanent recruitment campaign will commence June 2024 to replace large number of interim staff. Monthly update provided to DMT.

Monthly finance/risk and performance assurance meetings to challenge a;; resource allocation.

Future Controls

-

Implementation Date:

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HSI0057 Hanlon, Sue	Large number of procurement projects required in next 12-18 months as a result of contracts coming to an end and gaps in existing supply chain; Insufficient resource in the corporate procurement team to manage volume of work, and insufficient resource/capability in business operational teams to support procurement projects.	Contracts expire and we fail to meet regulatory requirements; contracts expire and suppliers confirm they no longer want to deliver the service and new contract not in place; Additional workload leading to stress for colleagues and higher levels of sickness absence	Hanlon, Sue Last Review: Last Amended : 08/07/2024 09:17:59	3	4	12	2	4	8

Existing Controls

- Consider most effective route to procurement to reduce work required to tender -Consider utilising existing procurement frameworks to achieve supply chain. For example SEC, Fusion 21, Crown Services
- Procurement Pipeline in place until 2026/27 -Procurement pipeline agreed and teams aware of the significant volume of work required in next 18 months
- Review resource required to support procurement projects - Monthly meeting in place between SMT Property Services and SMT Procurement service to review resource required to support procurement projects
- Service plans -

Future Controls **Implementation Date:**

-

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HTL0002 Ashley, Lara	NEC Phase 2 project deliverables delayed due to: - changes to requirements resulting in scope creep - lack of specialist resource to deliver projects - lack of embedded expertise within the service	- Delays to enhancements which deliver improved services - exposure to compliance failures/ lack of ability to manage compliance workstreams - continued reliance on subsidiary systems/manual systems and no single view of the customer - poor data quality through lack of validation and control	Ashley, Lara Last Review: 27/06/2024 Last Amended : 27/06/2024 09:50:19	4	3	12	4	2	8

Existing Controls

- Creating expert roles within the directorate to ensure expertise is embedded -
- Early engagement with NEC to allocate resources -
- Early engagement with resourcing specialists to build a permanent team -
- Enforced change control mechanism for "requirement changes" -
- Engage customers to ensure online resources meet expectations and ease the customer journey -

Future Controls **Implementation Date:**

-

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PP0030 Courcoux, David	The Council fails to adequately deliver the Improvement and Assurance Panel's Exit Strategy within the set timeframes.	Intervention could be extended Intervention level could be increased-commissioners appointed Reputational impact with residents and partners Reputational impact with staff Political and national media scrutiny	Snelling, Marie Last Review: 08/05/2024 Last Amended : 04/07/2024 17:25:07	4	3	12	4	2	8

Existing Controls

- Additional capacity sourced to support day to day relationship with IAP -and oversee all Council activity relating to the Exit Strategy and the process leading up to the Panel letters to the Secretary of State (IAP client lead role)
- Delivery plan produced, individual risks being identified and managed -
- Detailed milestones for all actions have been developed -
- Exit Strategy leads identified in directorates -
- Governance arrangements in place at DMT's/ CMT to oversee and challenge delivery on a monthly basis -
- Regular dialogue with the IAP including at monthly set piece with CMT and the Mayor -
- Update reports to IAP transparently tracking progress -

Future Controls

- Review delivery plan following IAP progress reports to the Secretary of State . .

Implementation Date:

30/09/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PP0032 Courcoux, David	Limited organisational capacity leads to non-compliance under the Public Sector Equality Duty.	Risk of legal challenge against decisions. Reputational risk with communities and staff.	Snelling, Marie Last Review: 19/04/2024 Last Amended : 04/07/2024 17:26:58	4	3	12	3	4	12

Existing Controls

- Additional temporary staffing used where required . -
- Equalities Annual Report taken to Cabinet and Council . -
- Equalities programme delivery monitored by the internal EDI control board -
- Equality Impact Assessments undertaken for all decisions . -
- Mandatory EDI training for all staff and elected members . -
- Updated Equality Strategy in place for 2023-27 -

Future Controls

- Ongoing monitoring

Implementation Date:
01/10/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PR0013 Agbakiaka, Karen	Unable to maintain parking income levels due to a number of factors.. 1. Reduction in income that is generated through charges applied to appropriate parking spaces across the borough. 2. Reduction in PCN income via civil enforcement officers and or ANPR camera enforcement. 3. Camera led enforcement income at risk due to on going compliances and less vehicular journeys on the network.	Financial - insufficient budget to cover the cost of service including both Capital and revenue. Reputational - Reduced service offer does not deliver required quality standards.	Agbakiaka, Karen Last Review: 26/03/2024 Last Amended : 04/07/2024 16:05:35	4	3	12	4	3	12

Existing Controls

- Review existing and identify additional schemes for ANPR (School streets, box junctions etc) -Additional schools streets built into the programme for 24/25 financial year - these are subject to either TfL LIP funding, S106 and or a spend to save bid through capital funding)
- To develop a monthly dashboard for accurate forecasting and reconciliation of income . -- Controls are in place to monitor all income streams on a monthly basis.
- Development a financial management dashboard to provide accurate information for transactions and income to form part of the monthly monitoring process.
- Undertake monthly reconciliation of income coming into the councils financial system and parking back office system .
- Dedicated corporate financial support to work with the service to ensure systematic financial management is in place.
- Working with London Councils & Peers across London to benchmark the parking account.

Future Controls

-

Implementation Date:

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PST0025 Cheesbrough, Heather	Development Management cannot recruit sufficient appropriately trained staff to manage workload and address backlog and fee income generated does not cover staffing needs.	Back log is not reduced in a managed manner Staff go sick with stress Staff retention and recruitment is exacerbated by high workloads Cases are not appropriately managed and checked to sufficient high standard leading to errors and increase in JRs and losing appeals Increase in appeals for non determination Loss of Fees through Planning Guarantee, having to return fees to applicants Increase in complaints Performance drops below Government set targets and becomes a designated LPA Very low determination approval rates leading to repeat applications	Cheesbrough, Heather Last Review: 04/07/2024 Last Amended : 04/07/2024 20:09:22	4	3	12	4	3	12

Existing Controls	
<ul style="list-style-type: none"> - Case officers to prioritise determination of cases and reduce negotiation and amendments to a minimum - - Developed a protocol for applications which may engage the Planning Guarantee and continue to implement agreed procedure - - Development of a Planning Improvement Plan following PAS Review -Range of actions to address recruitment and retention, IT software improvements to improve case officer efficiency , - Ensure that the re procurement of Uniform is fully informed by the procurement of the new corporate GIS - A new GIS is being procured for the Council and this capability has to be fully exploited and incorporated within the new systems that will replace Uniform. Close working is taking place between the relevant teams to ensure that spatial data can be easily collected, stored, updated, interrogated and manipulated to inform planning, regeneration and wider corporate decision making. - Review MFS on Planner salaries -This will have a budget impact but growth bid could be considered - Seek to increase productivity through technology following the recommendation of the PAS review -Through Transformation funding and a successful bid to DLUHC for digital skills finding , improvements to Uniform are being made and this includes some work to prepare a business case for the re-procurement of Uniform, which is an opportunity transform current poor IT, which is poorly set up and old, so giving rise to significant manual imputing. The GIS project once procured and incorporated into corporate processes should also facilitate more streamlined working. 	
Future Controls	Implementation Date:
-	

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
TRA0008 Sharon Godman	The transformation programme is not sufficiently ambitious enough , with insufficient change and savings	The council's aspiration to manage its finances and transform the organisation may not be realised	Godman, Sharon Last Review: Last Amended : 04/07/2024 17:29:24	3	4	12	3	2	6

Existing Controls

- Future Croydon transformation plan published March 24 -
- IAP receive regular updates on programme -
- Projects and programmes to be CMT reviewed every quarter (3 months) -

Future Controls	Implementation Date:
- Annual Review of the transformation plan A report on the YTD progress will be taken to Cabinet A new annual plan will be developed for the next financial year	31/03/2025
- Portfolio management embedded and leads to focus on project and programme delivery at a directorate level	30/09/2024
- Target Operating Model (TOM) blueprint due Sept 24	30/09/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
VRN0058 Aspinall, Kristian	Statutory Coroners service overspend due to increased demand pressures	Reputational damage Emotional impact on families Budget pressures if partners do not support additional resources	Aspinall, Kristian Last Review: 04/07/2024 Last Amended : 04/07/2024 11:59:09	4	3	12	3	3	9

Existing Controls

- Regular meetings held with local authority partners and Met Police - Weekly management meetings between the Council, MPS and Senior Coroner in place since September 22
- Regular meetings with Senior Corner held -
- Ringfenced reserve budget implemented -Ringfenced budget created from underspends in the service to cover any unexpected future costs.
- Second Coroners Court established to manage case backlog -Revised budget to include costs of a permanent second court and increased pathologist fees, both to avoid further additional costs
- Service improvement plan, with regular reporting -

Future Controls

-

Implementation Date:

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
VRN0059 Aspinall, Kristian	Failure to demonstrate effective business continuity and suitable alternate arrangements for service delivery leads to critical and other functions of the Council being unavailable to the public.	<ul style="list-style-type: none"> • Potential major service disruption in the event of a continuity incident. • Unable to meet statutory requirements potentially leading to financial, reputational or legal challenge. • Local and national media interest and scrutiny. • Unable to relocate / operate back office and front line staff following an incident that destroys or renders unusable Council buildings / offices. • Civil unrest / social upheaval either as a response to or a consequence of an event - please remove • Untenable position(s) of senior leadership teams - please remove • Ineffectual leadership and inadequate organisational operation. 	Aspinall, Kristian Last Review: 04/07/2024 Last Amended : 04/07/2024 12:01:12	4	3	12	4	2	8

Existing Controls

- Corporate Risk Register managed, maintained and updated regularly. -- Delivery of Risk Management Framework throughout the organisation via multiple methods and media.
- Further Business Continuity training for Corporate Resilience Team -
- Horizon scan and extensive network established -Use of London Resilience Forum and Croydon Resilience forum and other partner and sector specialist forums to increase knowledge and learning from other areas and incidents. .
- Lessons learned process undertaken after major incident -Ongoing
- Revised Corporate Resilience Internal Control Board to oversee BCP and EM arrangements -Board in place and chaired by CD Children's Services.
- Training and exercising programme to embed a culture of resilience through business continuity planning & other good governance -Ongoing

Future Controls

- Corporate review of BCPs Corporate review of all BCPs and processes built into workplace for EP team for 2024/25, to be completed by Autumn 2024r

Implementation Date:
01/10/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CEHR0073 Shoesmith, Dean	'MyResources' ERP total system failure stops the Council operating effectively, resulting in staff not being paid or managed properly .	<ul style="list-style-type: none"> • Unable to pay staff, pensioners and suppliers. • Unable to collect income efficiently. • Unable to manage the Council's accounts • Unable to manage employees. • Unable to recruit staff. • Reputational damage. • Unable to achieve statutory responsibilities. • Legislative action. • Staff dissatisfaction could impact ability to deliver services to residents. • Damage to local economy (SME's). • Unable to ensure business continuity. 	Shoesmith, Dean Last Review: 02/04/2024 Last Amended : 27/06/2024 14:27:52	5	2	10	5	1	5

Existing Controls

- Cloud-based backups -Cloud-base backups for My Resources
- External support -Third party support contract with Mastek
- Resource levels -Ensure the Support Team are correctly resourced to support the Oracle ERP

Future Controls

- Cloud-based backups Continue to have cloud-based backups to ensure key data is not lost and key systems can continue to function.
- Systems reliability Work and actions coming form the Oracle improvement programme for HRM finance and procurement to ensure greater systems reliability reducing out -of-system workarounds which can easily fail or go down.

Implementation Date:

01/10/2024
31/12/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CEHR0072 Shoesmith, Dean	Non-compliance with HMRC IR35 (Intermediaries) Legislation resulting in significant financial penalties.	- Financial loss through legislative and judicial action. - Compliance actions/penalties/audit from HMRC. - Reputational damage. - Organisational behaviour challenge through no consequence of non-compliance.	Shoesmith, Dean Last Review: 02/04/2024 Last Amended : 27/06/2024 13:45:25	3	3	9	3	2	6

Existing Controls

- IR35 status assessments -Use of the IR35 inbox and IR 35 panels using the HMRC assessment tool to ensure the correct IR35 status assessments are made to avoid HMRC non-compliance risks arising.

Future Controls

- Oracle Recruitment Cloud As part of the development of Oracle Recruitment Cloud , IR35 status for all temporary appointments will be built into the approvals to ensure the IR35 status is addressed upfront to reduce IR35 status risks. At present appointments can be made without addressing IR35 status upfront with the risk of an incorrect IR35 status.

Implementation Date:
31/12/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CIC0008 Rhys-Lewis, Huw	Wholesale gas, electricity and utility costs increasing and risk of continual increases placing unsustainable financial burden on the council,	Financial impact on the council - Market energy rates and costs are volatile.	Rhys-Lewis, Huw Last Review: 12/04/2024 Last Amended : 29/06/2024 09:13:58	3	3	9	2	2	4

Existing Controls

- Ensuring accurate meter reading and cost recovery from Schools and third party tenants -Future Control
The introduction of the new buying Group and panel provides greater flexibility to the Council in purchasing utilities during the 12 month period rather than purchasing 100% at the commencement of the term.

The market evidence that wholesale prices have dropped over the last 12 months with gas and electric prices falling between 20% - 25%
Given the Council is disposing of non- essential assets and we also now have better costs recover in place with schools and other Council owned buildings , the Council is less exposed to price volatility

- Pursuing a number of procurement options -looking at:
Group procurement
Specialist mid term fixed contracts
Forward spot hedging opportunities

Future Controls

- Council has adopted a new energy panel approach - working with other London Boroughs to achieve best value and increased stability on combined utilities tenders

Implementation Date:

31/03/2025

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CIC0010 Rhys-Lewis, Huw	Risk of financial loss due to the poor performance of Brick By Brick	<ul style="list-style-type: none"> • Council is liable for the outstanding debt. • Political and media scrutiny and interest. • Financial loss on sale of BxB assets. • Loss of interest on loan payments 	Rhys-Lewis, Huw Last Review: 12/04/2024 Last Amended : 29/06/2024 09:17:00	3	3	9	2	2	4

Existing Controls

- Additional Management support provided for Brick by Brick during managed wind down of the company. -
- Losses on BBB anticipated and covered in council budget -

Future Controls

- Close Down BBB now have sold their last housing development. LBC in discussions with potential purchaser to sell BBB. Should this fail then Council would seek to wind up BBB in a solvent fashion

Implementation Date:
30/09/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CIC0011 Rhys-Lewis, Huw	Corporate H&S responsibilities towards our staff are not managed leading to non-compliance with statutory requirements.	<ul style="list-style-type: none"> • Serious injury to or death of an employee. • Legislative action • Financial loss • Political interest • Media scrutiny • Custodial sentences for senior officers • Resignation / dismissals (high profile) 	Rhys-Lewis, Huw Last Review: 12/04/2024 Last Amended : 04/07/2024 18:15:49	3	3	9	2	3	6

Existing Controls

- Corporate H&S Group -
- Corporate H&S Policy -
- Corporate H&S team -Advising on the implementation of best practice in H&S. Active programme of risk assessments across the Council's operations.
- Corporate training for all staff and managers on H&S -
- Departmental H&S Groups and Policies -
- Divisional and Departmental H&S reps -
- Generic and specific risk assessments in place across the council -
- H&S Internal Control Board -
- HR Health & Safety Guidance (DSE reviews etc.) continually reviewed to ensure compliance and suitability. - Home working staff are under the HR process and not considered part of FM responsibilities as this is not an office issue.
- Incident recording and monitoring and risk improvement via the 'Info Exchange' system -
- Quarterly CMT presentations conducted. -

Future Controls

- H&S Policy being updated with staff training being rolled out across the Council

Implementation Date:

31/03/2025

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CIC0012 Rhys-Lewis, Huw	Contract Management and Supply Chain risk, including inflationary pressures. Implications for revenue and capital programme.	<ul style="list-style-type: none"> • Poor planning risks procurement challenge, poor supplier relations and overspend. • Non-compliance, budget overspend. • MTFS targets not met, poor supplier relations. • Reputational damage. • Political interest and scrutiny. • Media interest and scrutiny. • some contracts impacted 	Rhys-Lewis, Huw Last Review: 05/04/2024 Last Amended : 29/06/2024 09:24:20	3	3	9	3	3	9

Existing Controls

- Accurate contract register operational. -
- Contract actions monitored to ensure that they are delivered on time, - including contract savings programme and statutory/ discretionary assessment;
- Improvement plan for Procurement and Contract Management resourced and being rolled out -

Future Controls

- Enhanced governance arrangements designed and agreed at CMT Procurement and Contract Management Improvement Plan agreed and to be delivered .

Implementation Date:
31/03/2026

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CIC0025 Rhys-Lewis, Huw	Croydon Council companies: Robust governance, financial accounting treatment & risk management procedures/frameworks are not in place to safeguard the interests of the Council and its taxpayers in respect of all subsidiary organisations where the Council has an interest.	<ul style="list-style-type: none"> • Significant financial accounting adjustment • Reputational damage. • Political interest and scrutiny. • Media interest and scrutiny. • Council placed in unstable financial position leading to potential bankruptcy. • Potential fraudulent activity. • Continuing and increasing levels of non-compliance. 	Rhys-Lewis, Huw Last Review: 05/04/2024 Last Amended : 29/06/2024 09:36:21	3	3	9	3	3	9

Existing Controls

- LBC non-executive directors allocated to serve on all subsidiary Boards with training given -
- Monthly Croydon Companies Supervision & Management Board -is in place to provide Shareholder function chaired by the S151 Officer

Future Controls

-

Implementation Date:

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CIC0027 Rhys-Lewis, Huw	Procurement process is too bureaucratic and impacts on the council to move at pace.	Could impact on the timely delivery of outputs required and as set out in the Mayors Business plan	Rhys-Lewis, Huw Last Review: 05/04/2024 Last Amended : 29/06/2024 09:40:38	3	3	9	2	2	4

Existing Controls	
- Tender and Contracts Regulations have been updated and are in place -	
Future Controls	Implementation Date:
- Improvement Plan for Procurement and Contract Management being rolled out which will further improve control and performance	31/03/2026

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CIC0029 Rhys-Lewis, Huw	Re-procurement of contracts left until very late, close to or passed contract expiry	That extensions and waivers have to be used to extend contracts whilst re-procurement takes place. Likely to delay and hinder Council ability to move at pace to deliver transformation changes and savings as set out in the IAP Exit Strategy . Could impact on the timely delivery of outputs required and as set out in the Mayor's Business plan	Rhys-Lewis, Huw Last Review: 05/04/2024 Last Amended : 04/07/2024 18:18:38	3	3	9	2	2	4

Existing Controls

- Annual Procurement Plan in place and operational -
- Contracts Register is in place to enable operational teams to review when contracts are due -
- Service plan requirement to plan activity during the year -

Future Controls

- Improvement Plan for Procurement and Contract Management being rolled out to improve contract management

Implementation Date:

31/03/2026

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HOTS0010 Larbie, Mary	Failures to act on service requests and enquires generated as a result of meeting with residents	Reputational damage Notices from the Ombudsman	Larbie, Mary Last Review: 24/06/2024 Last Amended : 08/07/2024 09:22:45	3	3	9	2	3	6

Existing Controls

- Ongoing resident engagement both on Regina Road Estate and LPS blocks -
- Regina Road Delivery Options Paper for Cabinet -
- Report going to Cabinet in October 2024 setting out options -

Future Controls

-

Implementation Date:

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HSI0038 Hanlon, Sue	Significant overspend on HRA Repairs and Maintenance budget due to pressures from increased repairs demand including an increase in the number of damp and mold cases. Addressing the Legal Disrepair backlog (545 cases) whilst resolving new cases and undertaking fire and building safety remedial works identified through Fire Risk Assessments.	Uncontainable overspend in HRA budget resulting in additional pressure on the HRA Business Plan	Hanlon, Sue Last Review: 09/05/2024 Last Amended : 25/06/2024 20:11:00	3	3	9	3	3	9

Existing Controls

- Regular budget monitoring meetings -Monthly budget management meetings with finance colleagues to review spend against budget, identify trends/pressure points, take remedial action to contain spend within budget and only reforecast if required.

Future Controls

-

Implementation Date:

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HSI0042 Hanlon, Sue	The Council fail to comply with the requirements of the Building Safety Act within stated timescales.	Failure to comply with the requirements: - puts residents at a higher risk of fire and structural safety hazards and associated risks. - failure to demonstrate that buildings are safe to occupy means license to occupy is not obtained and residents have to be decanted - potential criminal action for non-compliance - regulatory implications - financial implications - reputation damage	Hanlon, Sue Last Review: 09/01/2024 Last Amended : 24/06/2024 16:32:05	3	3	9	2	3	6

Existing Controls

- Fire Strategy in place; procurement underway for suitably qualified contactors -100% FRA completed and 'known' risks being managed
- Fire remedial works identified during FRA visits and plan in place to clear these works over the next 12 months
- Close working with housing management colleagues to ensure communal areas are sterile to reduce risk of fire in high risk buildings
- Fire safety training undertaken with housing management, care & support and repairs/asset management colleagues
- Regular estate inspections undertaken which support reducing risk
- HRB - Safety Case Regime & Building Safety Management Team -The prime purpose of this is to ensure that the building safety management team have full oversight of information relating to the building, its immediate environment, planned works, compliancy, repairs, voids activities in near real-time and the residents that are living their and their individual needs. A building safety management system will utilise PowerBI to draw the relevant static and fluid information from across information sources into an individual block view. We have collated the information we can for the historical record. However external consultancy support required to develop safety cases on the 16 blocks in Tranche 1. Working collaboratively with the procurement team to on-board consultants.
- Prepare Tranche 1 Safety Case Reports -Appoint structural, fire and safety case consultancy support to complete outstanding surveys and prepare safety case reports for each individual HRB. 16 HRBs to be in Tranche 1 15 x LPS and Malcolm Wickes House.
- Procurement of suppliers to support compliance workstream -A gap analysis identified that only some of the required surveys and information gathering exercises have been completed. A schedule of activities required and indicative costs across all blocks have been shared with the procurement team. Procurement pipeline agreed and Head of Service leading procurement activities.

Future Controls **Implementation Date:**

-

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HSI0043 Hanlon, Sue	The Council fails to comply with statutory compliance and safety obligations, including undertaking remedial actions across its housing portfolio, leading to legal or regulatory interventions.	<ul style="list-style-type: none"> • Serious injury or death to tenants, members of the public, employees and 'blue light' service personnel. • Legislative action. • Financial loss. • Reputational damage. 	Hanlon, Sue Last Review: 27/06/2024 Last Amended : 27/06/2024 13:13:08	3	3	9	4	2	8

Existing Controls <ul style="list-style-type: none"> - Actions arising from Enforcement Notices and notices of Deficiency are logged and actioned immediately -Notices logged on database on receipt; Regular meetings with London Fire Brigade to build strong working relationship; monthly report to Compliance Board to monitor notices and actions; regular reporting to DMT. - Programme of fire safety investment developed and procuring new contractor to support delivery -Procurement underway to obtain specialist contractor to support delivery of fire remedial works over next 5 years. - The Compliance team works closely with the LFB -Regular meetings scheduled and taking place and good communication if and when notice of deficiencies arise and progress updates. 	
Future Controls -	Implementation Date:

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HTL0001 Ashley, Lara	NEC Phase 1: Income instability due to issues awaiting resolution within the system and delays to the creation of Planned Maintenance interface between NEC and Oracle Finance impacts the implementation of the new integrated Housing IT system (NEC) such that the delivery of some of the intended benefits is delayed. Current status is that the new integrated Housing IT system has been successfully implemented. Some issues remain to be resolved but are being actively managed.	<ul style="list-style-type: none"> • Cost of programme increases to support project resources for a longer period of time • Takes longer to onboard the required resources to deliver the project due to extended internal checks and balances on spending confirmed budget • Housing MTFS savings not able to be met until new system is live and sufficiently adopted • Reduction in staff morale due to change fatigue and financial pressures • Planned maintenance interface delay requires manual intervention that takes up additional officer resource and delays payments to contractors • Complaints arising from residents' inability to request balances and statements online 	Ashley, Lara Last Review: 27/06/2024 Last Amended : 27/06/2024 09:49:53	3	3	9	2	2	4

Existing Controls

- Additional Resources -Allocated to Service Charges balance corrections, with final testing and completion scheduled for June 2024
- Focused engagement for each change in interim officer at Head of Service , Director, and Corporate Director level -
- Institute processes and protocols for managing payments to planned maintenance contractors -
- Maintain active RAID log -/002 – ongoing
- Rent balance information has been corrected for rent and service charge accounts. -Resident portal live presenting residents with online information
- Responsive Repairs plan baselined for all workstreams -

Future Controls	Implementation Date:
- Resume Planned Maintenance Interface work - Planned maintenance interface work currently underway. Business requirements captured, and formal specification to be approved by management w/b 01-Jul-24. Have requested NEC Development time for w/b 08-Jul-24.	31/07/2024
- Service Charge Account Anomalies - Work on correcting Service Charges account anomalies underway . Estimated completion 31-Jul-24 after testing by the business	30/07/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PR0048 Agbakiaka, Karen	Surface Water and Fluvial Flooding - Climate change is resulting in increased extreme weather events and housing intensification is increasing the demand on the water management systems	High intensity heavy rainfall causes fluvial rivers in London (tributaries to the Thames) to exceed channel capacity and groundwater levels to rise, leading to surface water flooding in Croydon high risk areas. Leading potential emergency evacuation of residents in high flood risk areas and loss of critical infrastructure (activation of BECC). Increase in complaints due to localised flooding.	Agbakiaka, Karen Last Review: Last Amended : 26/06/2024 11:56:19	3	3	9	3	2	6

Existing Controls

- Capital Bids -submission of capital bids to deliver flood alleviation measures
- Local Flood Risk Management Strategy -The Flood and Water Management Act duties mean we are responsible for management of Local Flood Risk . The Croydon Local Flood Risk Management Strategy identifies 16 local flood risk zones known as Critical Drainage Areas (CDAs)

Croydon local flood risk management strategy 2023-2028 identifies CDAs and flood zones, and sets out how we will work with RMAs to address flood risk

- Scheduled Maintenance -Programme of scheduled maintenance on water control features (eg. trashscreens) and road gullies

Future Controls

- Surface Water and Fluvial Flooding A strategic data-led approach to flood investigation, improvements and long-term management of our existing and proposed drainage and flood assets.

Implementation Date:
06/06/2025

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PST0012 Cheesbrough, Heather	Under performance in achieving levels of external funding against service budget as a result of inadequate delivery of appropriate adult learning provision.	<ul style="list-style-type: none"> • Clawback of external funding. • Reduction in levels of learners leading to reduced outcomes around employment and skills for residents. • Political scrutiny. • Not achieving set targets in respect of 'residents into learning and jobs'. • Social isolation / community cohesion. • Reputational with funding agencies. • Public interest / scrutiny. 	Cheesbrough, Heather Last Review: 05/07/2024 Last Amended : 05/07/2024 12:05:43	3	3	9	3	2	6

Existing Controls

- Enhancing the 'digital future' offer in terms of enhanced curriculum offer (blended technologies). -
- Ensure fully engaged with GLA and partner engagement so LBC prepared for future funding models . -
- Ensure that provision aligns to sub-regional and regional skills strategies. -
- Marketing and Promotional strategy in place. -- Targeted events at particular communities and localities .
- Monitoring learner numbers for 2024/25 to ensure don't exceed 3%. -
- Moved funding to address Claw back, summer school programme to increase learner participation. - Working in the community to deliver summer courses , shorter flexible online courses being offered .
- Ongoing development of quality improvement plans to ensure 'good' outcomes from future Ofsted inspections. -
- Planning provision against the residents and business needs within the borough. -
- Transformation of Service -A review and plan to ensure CALAT remains relevant and provides appropriate and popular courses that will facilitate reaching those people more in need .

Future Controls

- Growth of the apprenticeship programme.

Implementation Date:

31/12/2025

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CIC0006 Rhys-Lewis, Huw	The Facilities Management Capital Programme is not delivered in a timely and prioritised manner.	<ul style="list-style-type: none"> • Reputational internally and externally. • Business disruption - internally and externally. • Lack of compliance with health and safety regulations, staff and customers could be put at risk. 	Rhys-Lewis, Huw Last Review: 05/04/2024 Last Amended : 29/06/2024 09:51:31	2	3	6	3	2	6

Existing Controls

- Monthly review of FM Capital Programme with Property Maintenance Manager and project delivery team. -
- Governance in place and follow guidance of the Councils Programme and PM framework.

Future Controls

- A rolling condition survey programme to be put in place to inform a 5 to 10 year FMP.

Implementation Date:
31/03/2025

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CIC0028 Rhys-Lewis, Huw	Partner, Supplier or Contractor suffers financial failure	<p>Potential impact on services to residents.</p> <p>In the event that a company suffers financial failure then it is likely to delay and hinder Council ability to move at pace to deliver transformation changes and savings as set out in the IAP Exit Strategy. It also potentially exposes the Council to financial loss</p> <p>Likely to impact on the timely delivery of outputs required and as set out in the Mayors plan</p>	<p>Rhys-Lewis, Huw</p> <p>Last Review: 05/04/2024 Last Amended : 05/07/2024 09:21:38</p>	3	2	6	3	2	6

Existing Controls

- Due diligence -Part of Due diligence is to complete full credit check review of contracting companies
- Financial check on Companies where appropriate -D&B financial health checks

Future Controls

- Regularly financial checks built into the contract management good practice guidance

Implementation Date:

01/10/2024

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
CIC0030 Rhys-Lewis, Huw	Lack of clarity of volumes being commissioned from individual suppliers could lead to supplier failure and breach of procurement controls.	Supplier could become overloaded and performance could fall. This likely to delay and hinder Council ability to move at pace to deliver transformation changes and savings as set out in the exit report to the Improvement Panel. Likely to impact on the timely delivery of outputs required and as set out in the Mayor's Business Plan	Rhys-Lewis, Huw Last Review: 12/04/2024 Last Amended : 04/07/2024 18:27:15	2	3	6	3	2	6

Existing Controls

- Annual Procurement Plan in place for high value contracts due to expire -

Future Controls

- Improvement Plan for Procurement and Contract Management being rolled out
- Transformation Programme

Implementation Date:

31/03/2026
31/03/2027

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
EHSC0001 Madden, Roisin	<p>Future changes to the Mandatory National Transfer Scheme may create substantial pressure on the Council to provide services for unaccompanied and separated children (UASC) given the location of Lunar House within the borough.</p> <p>The national quota for supporting UASC has been raised from 0.07% of child population to 0.1% which is an indicator of the impact of national decisions on local demand.</p> <p>Prior to the mandatory National Transfer scheme the council was legally responsible for all new arrivals presenting in the borough unless other councils agreed to take responsibility through the voluntary NTS.</p> <p>The impact of the mandatory NTS is to significantly reduce new children coming into Croydon's care, our numbers and proportion of UASC are reducing through children turning 18.</p>	<p>Support and care for UASC cannot be absorbed into the existing staffing structure and placement budgets as in other Councils due to the established high numbers.</p> <p>Pressure on placement supply of in-house and independent foster carers, and pressures on school places and CLA health services.</p> <p>Significant impact on the council's ability to discharge its statutory duties to all children and families in Croydon; to provide help and protection to children in need and safe effective services to all children in care and care leavers</p> <p>Legislative action against the council challenges decisions on behalf of children.</p>	<p>Madden, Roisin</p> <p>Last Review: 25/04/2024 Last Amended : 25/06/2024 20:02:46</p>	3	2	6	3	2	6

Existing Controls

- Existing Controls -Working with the Home Office to ensure that Adult Asylum Seekers are not placed in Croydon - Mandatory NTS introduced in November 2021

Future Controls

-

Implementation Date:

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
EHSC0018 Madden, Roisin	Effective action is not taken to address the underlying causes of social care expenditure specifically in terms of both the demand and the resulting financial pressures leading to fluctuating forecasts.	<ul style="list-style-type: none"> Continuing financial uncertainty If spend is not within budget Assurance Panel members may exercise powers directly. Reputational damage. Further savings required impacting on the council's ability to discharge statutory duties to all children and families 	Madden, Roisin Last Review: 25/04/2024 Last Amended : 24/06/2024 14:53:45	3	2	6	3	2	6

Existing Controls

- Scrutiny of financial accuracy through focused work alongside finance colleagues - Individual savings projects reviewed and challenged at DLT against a forward plan
 Increased use of Controcc to track and forecast expenditure
 Embedding monthly budget monitoring meetings and cycles of reporting.
 Effective use of Resource panels to ensure value for money and effective use of public funds for children and families

Future Controls

-

Implementation Date:

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HOTS0004 Larbie, Mary	Staff and/or contractors do not have adequate awareness of statutory safeguarding responsibilities due to inadequate training and awareness activity and plans to deliver this.	<ul style="list-style-type: none"> Breach of statutory responsibilities. Referrals not made when necessary. Potential harm / injury to tenants. Reputational risk for the Council. 	Larbie, Mary Last Review: 24/06/2024 Last Amended : 24/06/2024 16:36:15	2	3	6	2	4	8

Existing Controls

- All new ASB cases have a vulnerability assessments.. -...
- CSCB Safeguarding training programme. -New Children Safeguarding Co-Ordinator in post, responsible for tracking cases, coordinating training and SPOC across Council.
- Engaging in a new process for s11 to ensure compliance. -Promotion of the RVMP to encourage referrals from front line officers.
- Implementation of Section 11 audit recommendations which are being reviewed further recommendations agreed, -review of policies and procedures and increasing referrals....
- Improved MASH referrals and tailored training programme (joint) for Housing and CSC staff. -
- Safeguarding Steering Group set up and will review the s 11 audit action plan. -Safeguarding policies and procedures, referral processes / flowcharts.
- Safeguarding Training Programme completed. -- Safeguarding Co-ordinator in place.
- Building Managers have had Level 3 Safeguarding Training.
- Steering Group doing a single audit of 12 cases. -

Future Controls **Implementation Date:**

-

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
PST0008 Cheesbrough, Heather	Crystal Palace Football Club (CPFC) stadium expansion – failure to work in partnership with CPFC to deliver proposed stadium expansion to an agreed timeframe, capture local regenerative benefits/area plan and secure new controls to the stadium through the Section 106 Agreement from its expansion. Balance the demolition of affordable housing, with the decanting of tenants, re-provision of affordable housing else where in the borough to ensure no net loss of housing and the overall benefits of the scheme.	Tenant (Wooderson Close) dissatisfaction. Local infrastructure impact of failing to capitalise on the CPFC expansion and leverage for local regenerative benefits to Selhurst, South Norwood and Thornton Heath. Lack of delivery of regeneration and environmental Improvements to the local area.	Cheesbrough, Heather Last Review: 05/07/2024 Last Amended : 05/07/2024 12:02:54	3	2	6	3	2	6

Existing Controls

- Completion of the Wooderson Close and Indemnity Agreement -to ensure that LBC and costs incurred by LBC are indemnified, inclusive of addressing the implications of directly impacted Wooderson Close residents .
- Open channels of communication with CPFC -Relationships at operational and senior levels are fostered.
- Planning application decision notice close to issue post resolution to grant by planning committee and engagement with the GLA -
- Regular project briefings to the Exec Mayor/Cabinet Members for Planning and Regeneration and Housing. - Regular Ward Member updates

Future Controls

- The potential use of Compulsory Purchase Orders to assemble land for stadium expansion. The assembly of several land parcels is necessary to allow the stadium development to go ahead. This may require the use of Compulsory Purchase powers if CPFC cannot attain the land through negotiation. The Council would have to be fully indemnified by CPFC if such action was progressed.

Implementation Date:
30/12/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
HP0011 Hallett, Matthew	Risk of Treasury investments defaulting.	Financial loss	Hallett, Matthew Last Review: 16/05/2024 Last Amended : 04/07/2024 18:27:49	5	1	5	5	1	5

Existing Controls

- Selection and limits of who to invest with -The Council has set limits on the amount it invests and to who it invests its cash with, in order to reduce the risk of default and limit the size of any loss if default were to occur.

The Council can invest any amount with the Debt Management Office . This is very low risk as the investment is with the Government.

The Council can invest up to £20m with any one AAA rated money market fund. These are highly rated investments that provide daily liquidity and are therefore very low risk.

The Council can invest up to £10m with any other UK local authority. These are viewed as very low risk as they are effectively backed up by the government . There have been incidences where local authorities have run into financial difficulty but have not defaulted on their loan obligations .

The Council can invest up to £10m with other financial institutions in accordance with the suggested credit list advised and updated by the Council's treasury advisers.

Future Controls

- Review existing measures and reporting to Cabinet as part of the financial performance reporting
- Will report to Cabinet on treasury matters as part of the Monthly Financial Performance Report from 2024/25

Implementation Date:

31/03/2025

Risk Scenario			Current			Future Risk Rating			
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
MO0013 Lawrence-Oru mwense, Stephen	Significant staffing vacancies, reliance on agency cover and lack of a stable resource arrangement in legal services. Poor market supply of suitable candidate in areas such as children safeguarding, planning, housing, contracts and business support.	The inability to support and assist the Council to deliver its various statutory services. As a consequence, adverse publicity, reputational and financial impact arising.	Lawrence-Oru mwense, Stephen Last Review: 17/06/2024 Last Amended : 29/06/2024 10:06:20	1	1	1	1	1	1

Existing Controls

- New recruitment campaign to be launched by September 2024. To continue to -explore the market for locums with key experience and expertise to ensure delivery of vital services in the interim. To outsource work to external solicitors where required and within the LBLA framework. To ensure a stable interim team so as to maintain an effective service provision arrangement .

Future Controls

- Explore golden hello payment and market supplement payment for hard to recruit posts In the event of an unsuccessful recruitment campaign in July/August 2024 to liaise with HR and finance with a view to taking forward golden hello payments and market supplement for these hard to recruit posts.

Implementation Date:
01/11/2024

Risk Scenario				Current			Future Risk Rating		
Risk Ref	Risk	Impact	Assigned To	Impact	L'hood	Total	Impact	L'hood	Total
MO0014 Lawrence-Oru mwense, Stephen	A significant demand for legal services to respond to housing legal disrepair cases could lead to failures to protect the council and litigation loss.	The inability to support and assist the Council to deliver its various statutory services. The adverse publicity, reputational and financial impact arising. The financial impact of settling the housing disrepair claims. Adverse Court Decisions	Lawrence-Oru mwense, Stephen Last Review: 17/06/2024 Last Amended : 04/07/2024 18:30:10	1	1	1	1	1	1

Existing Controls

- Workload Monitoring. Additional Staffing funded by HRA . Working with Housing to better manage demand. -

Future Controls

- Work with Housing to Reduce Repairs Backlog. Improve Case Management Systems. Ongoing review of workload and capacity. If required request for additional resource to meet demand.
To work with the Housing Directorate to implement a litigation avoidance strategy so as to reduce demand and costs .

Implementation Date:
01/11/2024