

Strategic Risk Register @ August 2024



| Ris Risk Title and Description | Previous | Movement | Current | Target | Progress to Date | Key Sources of Assurance |
|---|---------------|------------------|---------------|--|--|--|
| k Ref | score | in risk score | risk score | risk score and date | (incl. current risk mitigating controls and further actions to be taken to manage risk and action date) | (3 lines of defence) |
| | (Dec 2023) | | (Aug 2024) | | | |
| 1 Children's Social Care | 8 | | 8 | 4 | Current and Ongoing Controls | 1 st line |
| Children's Social Care If the council does not put in place robust arrangements and receive appropriate assurances to ensure that the Sandwell Children's Trust (SCT) addresses the areas of poor or inconsistent performance, as outlined by Ofsted (and as required by the Statutory Direction served on the council on 6 October 2016), with rigour and pace, then the council will fail in its responsibilities to: Safeguard vulnerable children Promote and improve the outcomes of children in its care Manage any adverse financial consequences arising from the failure to create favourable outcomes for children within the resources available to it Continue on its progress to date and direction of travel to further improve the council's reputation for children's social care as currently demonstrated by the ILACS inspection. Risk Area – Children's Services Risk Owner – Sally Giles, Director of Children and Education Cabinet Member: Councillor Jalal Uddin | 8 (amber) | | 8 (amber) | 4 (green) Good Outcome of ILACS inspectio n by May 2025 | Current and Ongoing Controls Performance and contract management against KPIs and the improvement plan. New KPIs have been agreed and implemented as part of the contract review process and have taken into account the Otsted findings, as well as any findings from the national Care Review commissioned by the DIE around early help, children's social care and partner collaboration ahead of the issue of new statutory guidance contained in Working Together 2023. The Otsted inspection of adoption services commissioned through the RAA and delivered by the Trus trate all areas as 'Good'. The most recent Ofsted inspection of the Fostering service rated all areas as 'Good'. Ongoing measures to improve staffing levels and recruitment via the development of a workforce strategy and market supplements. Ongoing measures to improve staffing levels and recruitment via the development of a workforce strategy and market supplements. The inspection of Lecosing Services (LLACS) took place in May 2022 and reported a judgement of 'Requires Improvement to be Good' and continues to inform the risk score. Contract review was undertaken and presented to Cabinet in September 2022 resulting in a recommendation being made to the Secretary of State not to invoke the break clause within the Service Delivery Contract. Further Actions Development of a Family Help strategy to replace the previous Early Help Strategy, reflecting the government's response (Stable Homes Built on Love) to the Independent Review of Children's Social Care Implementation of a shared practice model across services. | 1st line Key Performance Indicators (including social worker vacancy rates and placements) Operational Partnership and Strategic Partnership Boards 2nd line Sandwell Local Safeguarding Children's Board Annual Report Reports to Scrutiny Rolling programme of audits of case files as part of the quality assurance framework Performance Management framework and Service Delivery Contract SCT business plan Corporate Parenting Board 3rd line Ofsted monitoring and focussed visits DfE improvement Board (independently chaired by a DfE consultant Grant Thornton – Value for Money Governance Review 2021 ILACS Ofsted inspection July 2022 Independent Reviewing Officer function SCT external audit report LG Futures benchmarking exercise Grant Thornton Value for Money Governance Review - Follow Up- December 2022 and September 2023 |
| 2 Business Continuity Management If the council does not develop, review, monitor and test plans and capabilities that seek to maintain the continuity of key functions in the event of an unplanned disruptive incident, then it will be unable to perform critical business functions which will impact the provision of council services and result in potential financial loss and loss of public confidence in the council. Risk Area – All council services Risk owner – Alan Lunt, Executive Director – Place Cabinet Member: Councillor Peter Hughes Objectives impacted: All | 8 (amber) | | 8 (amber) | 8 (amber) Achieved | Current and Ongoing Controls Business continuity plans are in place to mitigate the denial of staff (e.g. illness, industrial action), ICT (e.g. software failure, cyber-attack), facilities (e.g. building closure), stakeholders (e.g. suppliers, partners). These plans identify the criticality of each council service and the arrangements in place to restore services in the event of an unplanned incident. An SBS outage in May 2024 was well managed by the Council demonstrating learning from the event in May 2022. New Oracle Fusion business system will be online from October 2024 significantly reducing the risk to this system. Services to arrange workshops with a focus on ICT to improve business continuity planning, with support from Resilience Team and ICT. Two have taken place and two are scheduled. Further Actions Following the implementation of the new Oracle Fusion business system in October 2024 services will need to review plans and corporate planning undertaken to document response to any outage. Services to arrange business continuity workshops and take up offer from Resilience team to support. | 1 st line Emergency Committee Post incident reports Test exercises including cyber exercise 2 nd line Resilience team reports to Leadership Team 3 rd Line Audit and Risk Assurance Committee |
| 3 Compliance with the Data Protection Act 2018 (DPA 2018), the General Data Protection Regulations (GDPR) and Freedom of Information Act 2000 (FOIA) If the council does not ensure it has a robust framework in place to comply with the DPA 2018 (which includes GDPR) or FOIA then there is a risk that personal data is misused or misplaced. This could negatively impact 'data subjects' (normally our residents) and | 12 (red) | | 12 (red) | 8 (amber) March 2025 | Current and Ongoing Controls The Information Governance Board which is chaired by the Senior Information Risk Owner (SIRO) or Data Protection Officer (DPO) meets monthly to monitor progress of the information governance (IG) workplan. IG framework sets out the council's policies, requirements, standards and best practice that apply to the handling of information. The policies were reviewed in 2023/24. Information Asset Registers capture the information held by the council service areas and are reviewed annually. Information champions disseminate, feedback, facilitate and co-ordinate IG activity. Monthly review of ICO updates, guidance and sector practice. Annual completion of and compliance with the NHS self- assessment toolkit -NHS Digital which demonstrates the council processes in place to meet the requirements of the NHS's data protection standards and sharing arrangements. The submission for 2024 was completed in June with 'standards met'. Annual mandatory data protection and cyber security training is entrained for all staff. Compliance with the Council's data retention policy, which is reviewed regularly. | 1st line Information Champions Data Protection Officer Information asset registers Information incident log 2nd line Information Governance Board |

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| Rer | | (Dec 2023) | 30010 | (Aug 2024) | | | |
| Page 103 | | | | | | Improved performance and monitoring arrangements for compliance with FOI and SAR responses. Improved performance and monitoring arrangements for compliance with FOI and SAR responses. The Governance team report on performance to the IG Board and to Leadership Team on a quarterly basis. The Itatest statistics show that compliance continues to improve. The measures put in place in by the Council's Information Governance Team are working and need to continue and be built upon. Review of existing internal and public facing policy suite and IG framework. Report submitted to LT IN December 2023 and approved at Cabinet in January 2024. Updates to Council website and guidance on routes to access information and personal data. Privacy notice reviewed and updated. Transparency code compliance reviewed and new page on the intranet created with the relevant links. Implemented the email retention policy, and automatic retention is now in place. Further Actions A further programme of work to ensure compliance by elected members commenced during Autumn/Winter 2023, with GDPR training scheduled for September and October 2024. The procurement and embedment of a new case management system for FOIs and SARs. Proposals assessed and agreed in principle by the Capital and Asset Management Board in May 2023. However, a review as to whether a joint procurement of both a new corporate Customer Relationship Management System in support of the customer journey and new FOI/SAR case management system is nove to be considered. Strategic Finance to then assess the business case and funding options. New Council Monitoring Officer appointed who has initiated a review of all practices, procedures and policies to ensure best practice is embedded to underpin assurance of compliance frameworks for IG. Further improvement reguired in corporate compliance with disclosure requests and SARs. Refresh of existing training and | Performance data on compliance with FOI and SAR responses to Leadership Team and directors FOIA disclosure log 3rd line Information Commissioner's Office Internal Audit reviews First Tier Tribunal decisions |
| 4 | Cyber Security The public sector continues to be the | 12 (red) | | 12 (red) | 8 (amber) | Current and Ongoing Controls | 1 st line Self- assessment against cyber principles |
| | The public sector continues to be the target of significant, sophisticated and increasingly frequent cyber-attack with these intent on causing service disruption or disclosure of sensitive data. If the council does not invest additional and sufficient financial resources into a cyber security resilience programme, then it will remain at significant exposure of receiving a successful cyber-attack. The consequences will be: The inability of the council and SCT to deliver some or all services, particularly critical services for a significant period of time, ranging from days to months The loss of corporate and sensitive personal data (including bank details) Enforcement action Significant financial loss Employee stress; and Reputational damage Additionally, the council will be: Unable to meet sector defined standards and compliance for cyber resilience e.g. PSN Unable to share and collaborate with partner organisations in a joined-up manner as the council will not be viewed as a trusted partner | | | | Sept 2025 | Participation in national cyber resilience programmes run by organisations such as MHCLS, LGA and the NSSC Close collaboration between the ICT Service and the council's information governance Team to develop a holistic approach to information protection. Appropriate technical controls to protect the council's network perimeter and information assets. Updates and progress reports as requested to the Leadership Team and Corporate Scrutiny Board. Training for all staff through the implementation of the annual online training. Regular communications continue to be sent to employees pertaining to protecting themselves and the council from emerging and new cyber security threats. Attendance at national CTAG forum, MHCLG cyber clinics and Vest Midlands Warning of emerging threats, vulnerabilities and trends. Use of the Active Cyber Defence and Early Warning tools provided by the National Cyber Security Contre. An ongoing programme addressing the retirement and upgrade of obsolete and unsupported technology platforms. Annual ICT Health Check and Network Penetration Test Implementation of a 3^o party managed Security Operations Centre to detect potential threats within the council's ICT environment providing timely alerts 24 hours a day. Establishment of a Cyber Resilience Governance Board as part of revised ICT governance arrangements Uplift of Microsoft Enterprise Agreement Licensing to Enterprise 5 (E5) at anniversary date which includes a full suite of security and compliance tools. Redefined governance structure to provide oversight of ongoing improvement programme following allocation of additional cyber funding. CDDO Approve scanning and maintoring. | 2 nd line Cyber Board 3 rd line LGA Cyber Assessment NHS Digital PSN certification Audit and Risk Assurance Committee risk review Internal Audit review |

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| Risk Area – Finance and Transformation Risk Owner – Alex Thompson, Executive Director of Finance and Transformation Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council Objectives impacted: All Regeneration Fund Programmes If the council does not manage the programmes to ensure that all projects are delivered to scope, time and budget, then this could result in financial implications, the inability to regenerate our town centres, create sustainable economic growth and create long term economic prosperity and also reputational harm to the council. Risk area- Place Risk owner – Alan Lunt, Executive Director – Place Cabinet Member: Councillor Peter Hughes Objectives impacted – 2, 3, 4, 5 and 6 | 6 (green) | | 6 (green) | 4 (green) Programme completion of all projects and delivery of intended outcomes | This risk sets out the next phase of the Regeneration Fund Programmes. Towns Fund (approval received by the council for all 16 business cases that were submitted as part of the approved TIPs). Current and Ongoing Controls Robust governance in place to oversee the programme throughout the delivery phase including three Town Deal Boards (one per Town Deal Area), that have inherited Superboard roles and responsibilities. Revised governance arrangements for Delivery Phase were reviewed and approved by Cabinet in May 2022. The council is the Accountable Body for the Town Deal Inding. The Assistant Director - Spatial Planning and Growth chairs a Towns Fund Programme Board (which is also attended by the Director of Financa/ representative and officers from procurement and legal as well as all project leads) to review risks and provide a form for resource, programme transquements in place including appointment of a permanent programme management arrangements in place including appointment of a permanent programme manager, programme support officer, dedicated monitoring officer resource, programme risk register and project risk registers for agreed business cases, which are updated quarterly. Further Actions Orgoing implementation of delivery phase of projects and programme plan. Orgoing implementation of delivery phase of projects and programme via the Wednesbury LUP Board. Governance arrangements agreed by Cabinet in September 2023. The council is the Accountable Body for the LUP funding. The Assistant Director - Spatial Planning and Growth chairs a LUP Programme Board (which is also attended by representatives from Finance, and legal as well as all project leads) to review risks and provide a forum for resolution of issues, as well as seeking assurances in place to oversee the LUP programme via the Wednesbury LUP Board. Governance arrangements agreed by Cabinet in September 2023. The council is the Accountable Body for the LUP funding. The Assistant Director - Spatial Planning and Growth chairs a LUP Programme Boar | 1st line Town Deal Boards 2rd line Scrutiny Reviews Monitoring and reporting of outcome indicators, with processes in place to manage changes and risks during delivery stage. 3rd line Ministry of Housing, Communities and Local Government (MHCLG) |
| 6 Customer Experience Failure to provide a consistent, co- ordinated and efficient standard of service to customers in line with our Values and Behaviours. Contacts could result in sub-standard responses creating frustration for customers and repeat requests. The consequences of this could result in customers not engaging with important services or failure demand creating more expensive responses and diverting resources away from first time resolution of service requests. Risk area – All Council Services Risk owner – James McLaughlin, Assistant Chief Executive Cabinet Member: Councillor Paul Moore Objectives impacted - All | 12 (red) | | 9 (amber) | 8 (amber) March 2025 | Current and Ongoing Controls • New operating model for council employees is well embedded across all service areas. • Key priority within the Corporate Transformation Programme. • Regular discussions and focus sessions have taken place at Strategic Leadership Team to address concerns and issues. Also, a priority for Performance Board. • A new telephony system will be implemented in autumn 2024. • The MySandwell offer is continuously being developed. • Collection of Customer Satisfaction data is continuously being looked at and new methods trialled. • The four main Workstreams are: • Development of a Customer Experience Strategy 2024-2027 (to be approved in autumn 2024) • Review of Contact centres • Review of the One Stop Shop and exploration of a Community Hubs offer for face to face services in each Town. • Technology – review of all Customer related technology & identification of any gaps: procure delivery partner to replace the Council's telephony system (achieved). • Pilot local hub concept in two areas of the Borough (March 2024) - in progress in West Bromwich and Blackheath and to be extended for a further twelve months. • Delivery of bespoke Customer Services Training for front facing roles across the Council during autumn and winter 2024/5 • New Customer Service Standards developed and to be rolled out to all staff linked to Values and Behaviours Further Actions • Continued stakeholder engagement, in particular within the One S | 1st line Incorporate recent recommendations from Budget and Corporate Scrutiny into the Customer Journey Action Plan 2nd line Customer satisfaction survey Customer compliments and complaints system Budget and Corporate Scrutiny Board Review Monitoring, reporting & governance through the Customer Journey Programm Board which will report in to the Corporate Transformation Office and to the Cabinet Member Quarterly reports to Strategic Leadership Team on Member Portal performance. Customer Feedback Annual Report |

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| | | | | | Review of approach to Digital Working within the Council leading to a Digital Strategy (covering digital inclusion also) Directorate Leadership Teams to regularly review customer experience. Management Conference in November 2024 will provide feedback on poor customer experience to alert managers to examples of poor customer services and the impact of that on citizens. | Local Government Ombudsman report |
| Equalities If the council fails to meet its legal obligations in respect of the Equality Act 2010 and the Public Sector Equality Duty ensuring fairness is adhered to and is unable to demonstrate and evidence compliance with its obligations, then this will result in potential legal consequences for non compliance, reputational harm to the council as well as potential impact on recruitment and retention. Risk area – All Council Services Risk owner – James McLaughlin, Assistant Chief Executive Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council Objectives impacted - 5 | 8 (amber) | | 8 (amber) | 6 (green) | Current and Ongoing Controls An Equality Diversity and Inclusion Commission has been set up with agreed Terms of Reference ad is chaired by the Leader of the council. Six staff networks (Age Smart, Disability, Ethnic Minority, Frontline Workers, LGBTQ+ and Women) have been established and LT has agreed to protected time for Co-Chairs to develop the networks. A review of the Equality policy has been completed and was launched in December 2022, following Cabinet approval. New equality impact assessment toolkit and guidance has been issued and launched in December 2022 and drop-in clinics taking place to ensure the council's consultations and decision making will withstand scrutiny. An action plan has been developed based on feedback provided by employees across the council along with gaps identified in the workforce diversity data as well as best practice put forward by other public-sector organisations. A robust governance framework to help monitor and review the objectives and actions in the plan is also in place. An Equality Framework has been approved for use by Cabinet will be used to develop the council's first EDI Single Framework Strategy. The LGA Equality Framework has been approved for use by Cabinet will be used to develop the council's first EDI Single Framework Strategy. Refresh of the council's Equality Framework has been undertaken. An EDI action plan has been developed to enable the Council to respond to the findings of the audit. We have prepared a Public Sector Equality Duty (PSED) service user report. EDI E-Learning Module launched in August 2024. Further actions EDI Strategy to be developed by March 2025, based on the LGA Equality Framework Governance for EDI t | 1 st line Employee Engagement Survey 2022 2 nd line Sandwell Equalities Commission 3 rd line LGA Peer Review |
| Climate Change Failure to achieve the council's commitments in relation to Climate Change, including the pledge to make council activities, buildings, housing, fleet, schools and street lighting net-zero carbon by 2030 may result in: reputational damage financial impact increased demand for council resources (in the event of extreme weather) and a loss in public confidence. In addition, managing the effects of climate change will also have significant financial impact which the council will need to address. Risk Area – All Services Risk Owner – Alan Lunt, Executive Director – Place Cabinet Member: Councillor Keith Allcock Objectives impacted: All | 12 (red) | | 12 (red) | 8 (amber) 2025 - Update Action Plan Monitoring Tool and provide GAP analysis 2025 – Review and update Climate Change Action Plan 2030 – Target date for Council to become Net Zero | Current and Ongoing Controls Climate Change strategy 2020-2041 in place which sets out the 2030 target for the council. Member steering group to versee implementation of the climate change action plan. Climate change champions in place (officer level) and a Cabinet Member and member advisor champions in place. An action plan for implementing the strategy was approved by Cabinet in March 2022. Establishment of programme governance arrangements. Including the Cabinet approval to the appointment of cross-party membership to the Climate Change Committee to monitorin to the implementation of the action plan. A Climate Change Programme Board sand taction plan. Draft action plan monitoring tool has now been established following an internal audit report. This document is owned by the Climate Change Team and is currently being populated in conjunction with the relevant owners of each action across the various Council service areas. The monitoring tool has now been established following an internal audit report. This document is owned by the Climate Change Team and is currently being populated in conjunction with the relevant owners of each action across the various Council service areas. The monitoring tool will form the basis of future Climate Change Programme Boards and Member Steering Groups to appropriately track delivery of the Climate Change Strategy Actions and to allow costs (where applicable) to be provided for their implementation. This will also be presented annually to Cabinet for information. Further Actions Gag analysis to be conducted to assess the councils' ability to implement the action plan, followed by a report on available options which will be addressed in 2024/25. To undertake stock condition surveys to enhance our understanding of investment needs and costs to achieve net-zero targets in our social housing stock and to inform future revisions of the HRA business plan and opportunities to draw in external in | 1st line Climate Change Strategy 2020-2042 Climate Change Improvement Plan 2nd line Climate Change Programme Board Member Steering Group 3rd line 2023 Internal Audit Report – Limited Assurance |

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| Workforce Recruitment and Retention The council is required to recruit and retain a skilled, qualified and experienced workforce in order to provide and deliver services to Sandwell residents. If the council is unable to recruit and retain its workforce and deliver its statutory obligations to meet the needs of the community this could result in loss of reputation, penalties, litigation and in some cases imprisonment. Risk area – All council services Risk owner – James McLaughlin, Assistant Chief Executive Cabinet Member: Councillor Paul Moore Objectives impacted: All | 9 (amber) | | 9 (amber) | 6 (green) March 2025 | The risk concerns issues are largely a reflection of the regional and national position also and not unique to the council, as supported by the LGA workforce survey completed in 2022. The target risk score was initially to be reached by March 2023. However, this has been put back in order to allow the recruitment strategy to be agreed and fully embedded, and until results over the mid-term are known. Current and Ongoing Controls: Adoption of People Strategy and communication of ambition for the workforce, aligned to the Council Plan and Values and Behaviours, accompanied by annual delivery plans for each year. Recruitment branding has been updated and is consistent with corporate branding approach to maximise impact on candidate attraction. Directorates to continue to undertake comprehensive workforce planning at least annually, as part of business planning processes, with a focus on creating and nutruing talent pipelines. Recruitment and selection refresher training for hiring managers in order to share best practice in recruiting qualified and skilled employees. Pre-employment checks are carried out in line with requirements for the job role including any statutory requirements. Regular employment engagement (full) and pulse surveys are undertaken, and plans are developed and implemented to address any areas requiring further action. Pay benchmarking to ensure the council is competitive relative to the relevant job market in sectors where there are specific and critical challenges to recruitment and retention. Future Talent Strategy to be developed as part of the Organisational Development Programme who started in October 2023 and a further 2 graduates strategy and incorporate succession planning and talent development Tramework for all employees. We have recruited 6 graduates via the Natio | 1st line Pulse surveys HR related KPIs and data Appraisal process 2nd line Employee Engagement Survey Benchmarking analysis 3rd line LGA Workforce Survey 2022 |
| Borough Archives Failure to achieve the National Archives Accreditation could lead to withdrawal of 'Place of Deposit Status'. This will cause reputational damage and incur costs as public records will be stored in another location, which accrues a cost to the council and creates difficulties around access to the records. Accreditation cannot be achieved without alternative accommodation that meets the required British Standard. Risk area – All council services Risk owner – Alan Lunt, Executive Director - Place Cabinet Member: Councillor Suzanne Hartwell Objectives impacted: All | 9 (amber) | | 9 (amber) | 8 (amber) | Current and Ongoing Controls Public records are stored at Dudley archives which meets the required standard (BS EN 16893). However, this can only be a temporary measure, as Dudley's own archives increase, and they will require the space currently occupied by Sandwell. A feasibility study has been completed and a replacement archive solution for Sandwell's archives has been identified and was approved by <u>Cabinet</u> in November 2022. A New Qualified Archivist is now appointed and in place. The Business Manager – Museums and Archives is also a qualified archivist. Previous discussions with The National Archives (TNA) around delaying an application for accreditation as it would fail have moved on and we have now been encouraged to apply. We could only expect to achieve partial accreditation though, due to the accommodation. Second stage of feasibility that includes design, specification, and costs now complete. The development of a funding strategy supported by an archives funding specialist will follow which was approved by Cabinet in February 2024. This will enable submissions to be made to external funders with this currently being prepared. Further Actions Funding sources for cost of capital to build the archives needs to be identified and agreed. Some corporate capital will also need to be considered for contribution to the cost of capital, once the funding strategy has been agreed. A Towns Fund bid is currently being progressed to support the relocation of the Archives into Smethwick Council House prior to the construction of a new Archives Centre. | 1st line Feasibility Study 2nd line Cabinet approval of replacement archive solution 3rd line The National Archives Archive Service accreditation |

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| | | 2023) | | 2024) | | | |
| ¹¹ Page 107 | technical and operational issues that are being explored nationally, with there being a concern over the readiness of new systems in line with the projected timeframe. Whilst the application portal will be nationally hosted, the Returning Officer will remain locally responsible for the processing and issuing of postal votes. Should the Returning Officer be unable to implement the Elections Act 2022, this could result in low voter confidence and some voters may be dis-enfranchised leading to a lack of confidence in election results. Risk area – All council services Risk owner – Mike Jones, Assistant Director – Legal and Assurance Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council | 8 (amber) | | 9 (amber) | 4 (green) Sept 2025 | Current and Ongoing Controls Significant experience has been gained through recent local, combined authority mayoral, police and crime commissioner and national general elections held during the period May to July 2024 which are embedded into practice and procedure guidelines and training materials. There will be extra money from the Government for implementation, but this will not be ring fenced and will only cover costs associated with Voter ID not additional election costs. A One Council approach is being taken in order that the wider council can provide necessary support. The Electoral Commission will undertake much of the communication, but the Returning Officer needs to consider the demographics and harder to reach parts of the electorate and the support that they will require. There is a review of polling stations to see which ones are suitable and unsuitable. Robust and updated training programme will be in place for all polling inspectors and presiding officers. Job roles for election staff are being updated to provide clarification on what is required and to assist in arriving at the correct fee. The Electoral Services Manager is part of the Business Change Network facilitated by the Cabinet Office and consequently is very well informed. Privacy ID booths provided to every polling station to reduce the need for a specific place. This will be private but still in the 'voting room'. Awareness Campaign and media campaigns to promote Voter ID to compliment the national campaign by the Electoral Commission (which includes use of the Heraid, website, etc) Regular briefings with members undertaken during recent local, regional and national elections. Regular networking meetings taking place by Director and Manager. Capacity and resourcing Officer and Kanager will continue to review national sector best practice guidance and emerg | 1st line Elections Returning Officer Deputy Returning Officers Monitoring Officer Elections Service Manager 2nd line Polling station inspectors 3rd line Electoral Commission |
| 12 | Objectives impacted: All Sandwell Local Plan Failure to prepare and adopt a Local Plan within the timescales required could result in Government intervention in the operation of the planning service and in the decision-making process for planning applications resulting in a loss of local democratic oversight. Risk area - Regeneration Risk Owner – Alan Lunt, Executive Director – Place Cabinet Member: Councillor Peter Hughes Objectives impacted: All | 6 (green) | | 6 (green) | 4 (green) March 2025 | Having an up-to-date Local Plan is a statutory requirement. Conformity with an up-to-date Local Plan is often a prerequisite for Government regeneration funding. Following the halting of the Black Country Plan, Cabinet approved the preparation of the Sandwell local Plan on 16 November 2022. The process to adoption involves several rounds of public consultation and political approvals as well as an independent Examination in Public. Recently announced planning reforms involve changes to how Local Plans are prepared. Transition arrangements have been put in place for plans already well advanced and Sandwell is able to continue under these arrangements. The final stage of consultation is scheduled to begin in September 2024, and it is anticipated that the Sandwell Local Plan will be submitted to the Sec. of State for Examination in Public by the end of 2024. The timetable envisages the Examination being in the first half of 2025 with adoption in late 2025. We remain on target to achieve this. Current and Ongoing Controls Members regularly briefed on key and up to date issues. Informing of facts and evidence based. Project Manager recruited to lead on the delivery of the Sandwell Plan (fixed term post to Dec 2026). Additional revenue budget secured to deliver the Sandwell Plan (Cabinet Report Dec 2022). Additivita gainst agreed programme and reported to Leadership Team quarterly - consultation on draft Sandwell Local Plan completed in line with programme. Consultation on Publication Plan (the final version) is scheduled for September 2024 in line with the programme. Quarterly update reports to Leadership Team Ensure the Plan conforms with emerging Government planning regulations where relevant. | 1st line Appointment of dedicated project manager 2nd line Regular updates to Leadership Team, Cabinet Member for Regeneration and Cabinet as appropriate. 3rd Line Ongoing review of conformity with emerging Government planning reforms. |
| 13 | Organisational culture If the council does not have an effective organisational culture, then this could result in: Poor officer and member relationships Negative impact on employee engagement Inability to demonstrate effective people management, Weak diversity and inclusion practices Recruitment and retention issues Negative impact on the delivery of the improvement plan and | 8 (amber) | | 8 (amber) | 4 (green) March 2025 | Current and Ongoing Controls Regular meetings in place between senior members and officers to develop positive working relationships and information sharing. LGA training on officer/member relationships delivered in September 2022 and early 2024. Launch of One Team Framework (values and behaviours) including Staff Conference and Managers workshops Employee Engagement Survey 2022 results disseminated and discussed at Directorate Management Teams and team meetings - action plans developed and monitored at Leadership Team. Employee Engagement Survey 2023 results disseminated and discussed at Directorate Management Teams – actions to address themes incorporated into People Strategy and service business plans. Cabinet and Strategic Leadership Team Away Days arranged quarterly. New Council Plan and People Strategy launched in July 2024 Further Actions Embedding One Team Framework Approval of Workforce Strategy. Mechanisms to be identified for ongoing insight and assurance around health of Officer and Member Relationship (December 2023). Management Development Programme Agreed (2023). | 1st line One Team Framework 2nd line Employee Engagement Survey 3rd line External Reviews (Grant Thornton and LGA) providing assurance that organisational culture change has started to occur. |

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| Page 108 | Risk area – All council services | | | | | New Management Conference to be arranged for 400+ managers across the council. We Are Sandwell Awards New Neighbourhoods Model to be implemented in early 2025 which will improve Members' access to officers on the ground to get things done. | |
| 14 | Strategic Workforce Development for Adult Social Care Recruitment, Retention and Sickness Absence A workforce strategy is in place and links directly with workforce planning and training. This offers existing staff training opportunities to ensure that they are qualified and competent to face service needs. If recruitment and retention are not prioritised within the service and amongst service providers, then there will not be the skilled staff to deliver appropriate social care. Risk Area – Social Care Risk Owner – Rashpal Bishop, Director of Adult Social Care Cabinet Member: Councillor Jackie Taylor Objectives impacted: 2 | 12 (red) | | 12 (red) | 8 (amber) October 2024 | Current and Ongoing Controls ASC Workforce Strategy approved by the ASC Transformation Board in January 2024 in place. The Core Workforce Delivery Group has been established. Workforce Workshop held in January 2024. Recruitment Events held. An Occupational Therapist student programme with Worcestershire University is in place and works to secure university placements including access to Practice Educator training for SMEC Occupational Therapist's to retain their skills and expertise. A student programme and the Assessed and Supported Year in Employment for Social Workers is in place. Apprenticeships within the Directorate ullising the Apprenticeship Levity to access accertified qualifications. An apprenticeship programme for social work is in place with Warwickshire University, a similar programme for Occupational Therapy is being developed with Wolvekmanption University. Qualification Sponsorship scheme to support employees to obtain recognised qualifications to enhance their work performance and skills. Work around maintaining recruitment work and therapy to deliver a career development pathway which will support retention, career development and succession planning within social work. Plans are developed and implemented to address any areas requiring further action from the employee engagement survey. ASC branding for our unique selling point in place. Brophoyee Relations Meetings. Managers in regular welfare contact with employees and refer to occupational health where muscular/skeletal and stress, depression and mental health related abserve. Managers in regular welfare contact with employees and refer to occupational health where muscular/skeletal and stress, depression and mental health related abserve. Managers in regular welfare contact with employees and refer to occupational health a | 1 st line HR rela Apprais 2 nd line Employ Nationa Benchm |
| 15 | Medium Term Financial Strategy (MTFS), Central Government Funding and Resource Allocation Government may not provide timely resolution on the future plans for health and social care reforms, the Public Health grant, the Better Care Fund, the package of one-off social care grants, business rates reset and retention, and future years funding., One year funding | * | * | * | * | * There are a number of factors that underpin the wider risk score for this risk, and the score will continue to remain fluid throughout each 12-month cycle as the council develops its MTFS, generally in-line with the below pattern. However, overall the council is confident that it has processes in place in order to be able to adequately mitigate these risks, and that it will remain able to effectively discharge its statutory responsibilities, including the setting of a balanced budget for future years. 2024/25 2025/26 2026/27 Onwards | 1 st line Busine Propos 2 nd line <u>Budget</u> Star Ch |

| | Key Sources of Assurance |
|--|---|
| on date) | (3 lines of defence) |
| round to get things done. | |
| | |
| | |
| | 1 st line HR related KPIs and data Appraisal process |
| sity placements including access to | 2 nd line Employee Engagement Survey National Minimum Data Set for social care |
| pational Therapy is being developed with | Benchmarking analysis |
| rformance and skills. plement completed. can raise any concerns. ch will support retention, career | |
| survey. | |
| | |
| ress, depression and mental health related | |
| Operational Heads Meeting ih May 2024 | |
| ive is to conduct a comprehensive review data on absences, the group aims to | |
| | |
| ith the Adult Social Care Transformation | |
| will include recommendations for | |
| hout each 12-month cycle as the council ace in order to be able to adequately alanced budget for future years. | 1st line Business case templates – Savings Proposals |
| | 2 nd line Budget and Corporate Scrutiny Board Star Chambers |

| Ris Risk Title and Description | Previous | Movement | Current | Target | Progress to Date | Key Sources of Assurance |
|--|---------------|------------------|---------------|------------------------|---|---|
| k Ref | score | in risk score | risk score | risk score and date | (incl. current risk mitigating controls and further actions to be taken to manage risk and action date) | (3 lines of defence) |
| | (Dec 2023) | | (Aug 2024) | | | |
| Settlements inhibit local authorities' from effectively managing medium term/ five-year financial plans. If the council is unable to plan effectively then this will impact on the council's financial resilience and its ability to effectively discharge its statutory responsibilities. Short term decisions may not achieve best value. This will impact on the council's ability to deliver sustainable services to the people of Sandwell. Risk Area – All Council Services Risk owner – Alex Thompson, Executive Director of Finance and Transformation Cabinet Member: Councillor Paul Moore Objectives impacted: All | | | | | Current and Ongoing Controls The review by CIPFA on the council's financial management and governance arrangements, noted that the council was initially a progressive two-star (out of five) authority. The follow up review subsequently undertaken by CIPFA progressed this to a three-star. The review also looked at financial resilence and undersgend. An undersgend was devired in 2022/24 and in 2023/24. A fundamental review of the MTFS incluse the ambitions of the corporate plan and regeneration plans for Sandvell. A balanced budget for 2024/25 was approved by Council on 20⁶ February 2024 and included savings totalling £1m. Monthy monitoring of savings is carried out by Finance Business Partners in year. Savings are RAG rated and reported to Directors monthly through DMT meetings and to LT budget meetings. Budget surgery meetings were used mit-year in 2023/24 and included savings is carted red, with a view to understanding any resumptions the organisation. Monitoring of savings is cartified for the review assings rated red, with a view to understanding any resume startes frow and savings are related by the Director of Finance, appropriate Directors and a range of officers from across the organisation. Monitoring of savings includes any savings cartied forward from previous years that were not delivered in those years. Star Chamber meetings continue to be used to support budget setting. During August and September 2023, a. Star Chamber meeting was held in relation to each Chamber meetings include the Chief Executive and Portfolio Holders as well as the appropriate Director and Finance Business Partners. This process is being repeated fulfing Summer 2024. Star Chamber meetings are used as the initiation process to generate further savings proposal for the following financial year and to test those proposals with detectorate budget pressures and goverth more costs fowards, budindin in assumed increases in marker tates. | 3 rd line External Audit CIPFA financial management review LGA Corporate Peer Review Grant Thornton Value for Money Governance Review - <u>Follow Up- December 2022</u> LG Futures benchmarking data |
| Budget Monitoring and Management 2024/25 If the council does not put in place effective arrangements to monitor and manage the current year's budget then it will result in overspends and impact the resilience of the council's finances. Without timely and accurate monitoring the revenue and capital expenditure could exceed the agreed budget. This applies to the General Fund and the Housing Revenue Account (HRA). Risk Area – All Council Services Risk owner- Alex Thompson, Executive Director of Finance and Transformation Cabinet Member: Councillor Paul Moore Objectives impacted: All | * | * | * | * | The score will continue to remain fluid throughout each 12-month monitoring cycle, however, overall the council is confident that it has processes in place to be able to forecast the outturn position within a reasonable degree of certainty, and confident that it has the resources in place to be able to mitigate a forecast overspend position in the current year, up to a degree of tolerance of approximately 0.5% of the gross budget. 2024/25 Monitoring Period Apr May Jun Jul Aug Sep Oct Nov Dec Jan Feb Mar Revenue Budget Monitoring Position Current and Ongoing Controls A budget monitoring timetable is created annually and circulated to all in Finance, so that monthly monitoring deadlines are clearly understood and adhered to. Elements of the monitoring timetable relevant to budget holder involvement are circulated to budget holders. Directors and ADs are asked to sign budget accountability letters at the start of the financial year, which set out the budgets available to each senior officer and provide assurance that the budgets are understood and will be adhered to as far as possible. As part of the budget monitoring process, year to date expenditure figures are compared with profiled budgets, and variances to date are used to calculate forecast outrum information, in conjunction with information from budget managers, historic data, trend data and any other relevant information Salaries monitoring is carried out at individual post level, using year to date cost information and information from budget managers on any changes in staffing that will take place in year. | 1st line Assigned budget holders 2nd line Leadership Team Budget and Corporate Scrutiny Board 3rd line External Audit Annual Internal Audit review- budgetary control |
| | | | | | All budget holders are sent their budget monitoring report monthly, and regular meetings are held between budget holders and Finance Business Partners. Budget holders are asked to provide forecast outturn information monthly. Heads of Finance Business Partnering collate information for all directorates, challenging and checking assumptions with Finance Business Partners. Directors take ownership of their directorate's monitoring position, signing off the position for their directorate each month as a true reflection of the position. Finance Business Partners attend DMT meetings monthly to present each directorate's monitoring position, to ensure that the position is understood by all ADs and that mitigating actions are proposed to deal with overspends as necessary. The monitoring position is presented monthly to Leadership Team, quarterly to Cabinet and quarterly to Budget Management and Corporate Scrutiny Board. Budget Management and Corporate Scrutiny Board has the opportunity to make recommendations to Cabinet in relation to the budget monitoring position reported. | |

| Ris k Ref | Risk Title and Description | Previous score (Dec 2023) | Movement in risk score | Current risk score (Aug 2024) | Target risk score and date | Progress to Date (incl. current risk mitigating controls and further actions to be taken to manage risk and action date) | Key Sources of Assurance (3 lines of defence) |
|-----------------|---|------------------------------------|------------------------------|--|----------------------------------|---|---|
| Page 110 | | | | | | Monitoring of current year savings (as per the MTFS) is carried out monthly by Finance Business Partners and presented to DMT meetings monthly and Leadership Team meetings monthly, so that the impact of any non-delivery or slippage of savings on the Council's outturn position is understood. Savings monitoring is also now included within quarterly budget monitoring reports to Cabinet. A significant projected overspend at period 7 of 2023/24 led to immediate and proactive action by Leadership Team to introduce expenditure control measures in order to reduce the forecast overspend. Value for Money Panels and Vacancy Management Panels were introduced, reviewing and challenging all new expenditure requests over £1,000 and all new recruitment requests (respectively), and these measures are still in place in 2024/25. These measures will help to mitigate any deterioration in the monitoring position and will also ensure that the required in-year vacancy management savings (as per the MTFS) are delivered. Further Actions Introduction of Oracle Fusion during 2024, which will provide each budget manager with 'real time' access to their area's budget and spend data. Involving budget managers in the budget setting process will ensure that they understand their budget figures and how they have been developed. Introduction of Oracle Fusion will lead to budget managers taking ownership of the budget monitoring process for their areas, actively reviewing data and ensuring that outturn projections are completed. Finance Business Partners will be able to ensure that monthly challenge meetings are taking place with ADs and that mitigating actions are proposed and put in place to address overspends. | |
| 17 | Statement of Accounts The Council may be unable to produce its outstanding Statements of Accounts for 2022/23 and 2023/24 and/or failure to produce a Statement of Accounts for 2024/25 within the required statutory deadline. This could lead to reputational damage from potential qualification of the statements. Risk Area – Finance and Resources Risk owner – Alex Thompson, Executive Director of Finance and Transformation Cabinet Member: Councillor Paul Moore Objectives impacted: All | 8 (amber) | • | 6 (green) | 4 (green) April 2025 | Current and Ongoing Controls A team of interim specialist contractors has been put in place to produce the outstanding Statements of Accounts and to address resulting audit queries. A draft Statement of Accounts for 2022/23 is due to be provided to Grant Thornton by September 2024, and the resulting partial audit is due to be completed by 13th December 2024, in accordance with the central government 'backstop' deadline which is likely to be imposed. A resource plan will be put in place by the Interim Head of Technical Accounting to deal with audit queries during the three/four month audit period, to ensure that officers are available to respond to queries and that there are no delays to the audit timetable. In parallel, the Finance team is aiming to produce the draft Statement of Accounts for 2023/34 by end of November 2024 in order that a further partial audit can be carried out by the likely backstop deadline of 28th February 2025. A closedown timetable for outstanding 2023/34 tasks is in place to help to manage this work. A closedown timetable for 2024/25 will be produced by the Interim Head of Technical Accounting by the end of February 2025, and officer training will be delivered as required in advance of the closure period. A plan will be put in place for knowledge and skill transfer between the interim specialist contractors and the council's permanent Technical Finance team to ensure that permanent staff are able to produce Statements of Accounts in the future in-house. | 1st line Interim Head of Technical Accounting 2nd line National guidance/regular updates across the sector 3rd line External Audit Audit and Risk Assurance Committee |
| 18 | Oracle Fusion Implementation The risk is that implementation is not completed and that SMBC: Cannot demonstrate a return on investment of time and money utilised on the programme. Cannot access the business benefits of the modern system that include ease of use, resilience and efficiencies for the Council and our customers. Must restart a replacement programme incurring further expense and an extension of the existing arrangements with SBS. Risk Area – Finance and Resources Risk Owners – Alex Thompson, Executive Director of Finance and Transformation Cabinet Member: Councillor Paul Moore Objectives impacted: All | 9 (amber) | | 9 (amber) | 4 (green) October 2024 | The project remains at an overall Amber status. Project structures and resources remain in place and the programme has exited User Acceptance Testing in accordance with revised timelines set by the board in June. The Programme is working to an October Go-Live for all modules. Overall the project is on track to meet the next key decision point. The Programme Board will assess whether the Project is ready to start the process to Go-Live on 04/09/24. Key areas of risk, to enable progress and allow access to the intended project benefits, relate to scheduled actions requiring further board approval. These are primarily: Closure of outstanding incidents to ensure minimum work arounds in place after the system is live. Review and approval of any work arounds identified for after the system is live. Closure of the bank reconciliation testing Further progress in the delivery of outstanding reports required for Go-Live Final approval of security and roles to be in Oracle Fusion Testing of the process to issue roles for Go-Live Mitigations: Detailed governance, daily meetings to monitor and support progress, resolve issues and prioritise activity. Daily status monitoring of incidents and process in place to control the raising of any new incidents. Meetings with Project Sponsors throughout each week to gain direction and provide visibility of progress. Testing of the spore for O-live form 19 August 2024 Plan for approval of Security approval at next Programme Board 29 August 2024 Detail project plan and action log ensuring all items are progressed with target dates for resolution. | 1st line SOCITM – Programme Management 2nd line SRO (ED Finance and Transformation) Chairs Project Board Programme Board that includes SMBC officers, SOCITM, Infosys, Oracle. SRO updates Leadership Team and Cabinet 3rd line Grant Thornton <u>– Value for Money</u> Governance Review 2021 Grant Thornton Value for Money Governance Review - Follow Up- December 2022 Grant Thornton review of Oracle Implementation |
| 19 | Housing Transformation. If the council does not put in place robust arrangements and receive appropriate assurances to ensure that the Housing function meets the requirements under the new Regulatory regime from both the Regulator of Social Housing and the Building Safety Regulator, with rigour and pace, then the council will fail in its responsibilities | New | NA | 9 (amber) | 6 (green) March 2025 | Current and Ongoing Controls Self-assessment underway for consumer standards. Briefing arranged for SLT and Cabinet on the regulatory regime. Third party audit to ensure compliance with documentation. Housing Transformation Project in flight to delivery service efficiency, compliance and improvement. | Penningtons Audit (3rd level) - self assessment - critial friend Proactive Engagement with the Social Housing Regulator for transparency on compliance risks and improvement plans (3rd level) |

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|-----------------|---|------------------------------------|------------------------------|--|----------------------------------|--|---|
| Page 11 | to provide good quality affordable housing. Risk Area – Housing Risk Owner – Alan Lunt, Executive Director - Place Cabinet Member: Councillor Vicki Smith Objectives impacted: 4 | | | | | | |
| 20 | Homelessness and Temporary Accommodation. Increasing demand from homeless presentation is resulting in more and longer placements in temporary accommodation, mitigation is required to prevent budget pressures from cost of the TA and subsidy loss through Housing Benefits and to avoid unlawful placements of households with children in B&B accommodation for longer than 6 weeks. Risk Area – Housing Risk Owner – Alan Lunt, Executive Director - Place Cabinet Member: Councillor Vicki Smith Objectives impacted: 4 | New | NA | 12 (red) | 9 (amber) March 2025 | Current and Ongoing Controls Homelessness and Rough Sleeper Strategy revised in 2022, Service Operating model focuses on early intervention and prevention. Range of interventions in place to prevent homelessness from the private rented sector, Procurement of new contract for Temporary Accommodation delivered in 2023 in addition to increasing the size of own stock provision. Canvassing for uplift on Local Housing Allowance to be increased annually in line with inflation. Needs Assessment and Procurement of new Supported Housing Contracts completed in 2024. Further Actions Mobilisation of plans to convert a second former Extra Care Scheme from single person TA to family TA. Canvassing for changes to Homeless Prevention Grant formula which we see a 50% reduction in service provision in 25/26 if not amended. Additional procurement in progress for interim accommodation to reflect longer TA placements. | Ministry of Housing, Communities and Local Government Advisory meetings held quarterly (3rd level). |
| 21 | Continuous Improvement The Council is no longer under government intervention and has concluded its Improvement Plan associated with that period of intervention. Failure to focus on continuous improvement across the organisation, as well as with our strategic partners and contractors like Serco, Sandwell Children's Trust and Sandwell Leisure Trust, and ensure that momentum is maintained as part of our journey towards becoming an excellent Council is a risk. Risk Area – All Council Services Risk Owner – James McLaughlin, Assistant Chief Executive Cabinet Member: Councillor Kerrie Carmichael, Leader of the Council Objectives impacted: All | New | NA | 9 (amber) | 4 (green) June 2025 | Current and Ongoing Controls A performance management framework was approved by the council in April 2022 to help monitor performance and track progress on the delivery of the strategic outcomes in the Corporate Plan. Review of Governance and Decision Making built into Corporate Transformation Programme. The appointment of a permanent Strategic Leadership Team has been concluded, pending recruitment to Executive Director of People Performance Board meets quarterly to review KPIs in the new Council Plan and People Strategy, external contractual arrangements and Member Casework. Activity from the former Improvement Plan embedded within the Council's Council Plan and AD Business Plans Grant Thornton VfM Governance Review follow up review in December 2023 highlighted the continued progress of the council on its improvement journey and lifted the three statutory recommendations from their 2021 review. Arrangements for scrutiny consideration of the council's key contracts is in progress. Establishment of consistent contract management for both significant capital and service contracts across the Council. The contract management resources online (Council Intranet site) provide templates for a consistent approach to contract management. In addition, the introduction of the contract management module on Oracle Fusion will contribute towards effective contract and performance management (it can capture information around KPIs and risks etc) Further Actions Ongoing implementation and monitoring of the progress made against the plans. Demonstrating evidence of sustainable and continuous improvement Review to address key and improvement recommendations from Grant Thornton's 2023 follow up review. LGA Corporate P | 1st line Council Plan 2nd Line Reports to Performance Board, Cabinet and Budget & Corporate Scrutiny Management Board on quarterly basis Audit and Risk Committee 3rd line Grant Thornton Value for Money Governance Review - Follow Up- December 2023 |
| 22 | SEND – Placements and Transport If the council does not consider options on how to manage the increasing upwards trajectory of costs and demand in respect of SEND Travel Assistance and SEND placements then this will significantly impact the Council's budget and the High Needs Block Risk Area – Children's Services Risk Owner – Sally Giles, Director of Children and Education Cabinet Member: Jalal Uddin Objectives impacted: 1 | New | NA | 16 (red) | 6 (amber) August 2025 | This risk relates to the national rise in children and young people with SEND and who require Education, Health and Care Plans (EHCPs) which in turn results in increasing demand for additional support services including specialist placements. The increased demand arises from a combination of factors including population growth, better and earlier diagnosis of conditions such as autism and extension of the service for children with SEND up to the age of 25 (the latter took effect in the context of the 2014 reforms, which were not funded). Covid lockdowns / inconsistent educational support have also had an impact and have contributed to a rise in Social Emotional and Mental Health referrals for multi-agency assessment / EHC plans from Early Years to Post 16. There has been a significant increase in requests for specialist placements (Special schools / mainstream schools with Specialist Resource bases/ SEN Units). The increase in the number of children and young people with EHC plans has also driven up transport costs. Current and Ongoing Controls Robust operational monitoring remains in place to ensure safeguarding and quality of provision. Development of a needs assessment to support the delivery of a specialist place planning strategy to address capacity issues and ensure that children and young people can attend local school, rather than independent specialist provision out of borough. The establishment of a Flexible Purchasing System provides the opportunity to work with the transport market in a different way increasing opportunities for new providers, leading to a more competitive market, and reducing costs. Newton Europe have now completed a diagnostic, looking at the end to end SEND Travel Assistance process and how it can be improved, and costs reduced. | 1st line Key Performance Indicators Budget Monitoring 2nd line Regular updates to leadership team Corporate Transformation Board 3rd line Ofsted monitoring visits Newton Europe Diagnostic Areas SEND Inspection July 2023 |

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|-----------------|----------------------------|------------------------------------|------------------------------|--|----------------------------------|---|--|
| Page | | | | | | Further Actions Following SEND diagnostic work undertaken by Newton Europe a partner will be appointed to help deliver the transformation programme, with a focus on reducing demand for travel assistance. Continue to work with market to deliver a VFM high quality service. An improvement plan is being developed to ensure that systems, processes, and structures in Inclusive Learning Services are robust, streamlined and effective. | |
| 112 | | | | | | | |